



The Sizewell C Project

9.44 Written Summaries of Oral Submissions made at ISH4: Socio-economic and Community Issues (9 July 2021)

Revision: 1
Applicable Regulation: Regulation 5(2)(q)
PINS Reference Number: EN010012

July 2021

Planning Act 2008
Infrastructure Planning (Applications: Prescribed
Forms and Procedure) Regulations 2009



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1 ISSUE SPECIFIC HEARING 4: SOCIO-ECONOMIC AND COMMUNITY ISSUES

1.1 Introduction

1.1.1 This document contains the Applicant's written summaries of the oral submissions made at Issue Specific Hearing 4 (ISH4) on socio-economics and community issues held on 9 July 2021.

1.1.2 In attendance at ISH4 on behalf of the Applicant was:

- Hereward Phillpot QC of Francis Taylor Building (Counsel);
- John Rhodes of Quod (Planning Manager (Strategic));
- Andrew Hunt of Quod (Socio-economics Lead);
- Mike Humphrey of Quod (Socio-economics Lead);
- Laura Robinson-Brown of SZC Co. (Sizewell C Security Manager).

1.1.3 Where further information was requested by the Examining Authority (ExA), this is contained separately in the Applicant's **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).

1.2 Agenda Item 2: Socio-economics

Implementation Plan

1.2.1 The ExA noted that in **Volume 2, Chapter 9** of the **Environmental Statement (ES)** [APP-195] paragraph 9.6.4 assumes that the primary mitigation measures are in place to mitigate otherwise potentially significant effects, and queried - in light of the revision to the **Implementation Plan** submitted at Deadline 2 [REP2-044] - what effects those revisions may have, and whether the Applicant would need to revise any of the information within the socio-economic assessment as a consequence of those changes.

1.2.2 Mr Hunt (Quod, appearing for the Applicant SZC Co.) responded that there are two changes, but that the changes to the **Implementation Plan** [REP2-044] do not increase the overall output of work (i.e. person-months) required, but could move the workforce around (temporally) slightly to change the workforce profile. The changes are likely to mean:

- a) By introducing a 'Year 0' to the profile, some of the activity that would otherwise have taken place in Year 1 and Year 2 will now be stretched over Years 0, 1 and 2, effectively reducing the average on-site workforce in that period.
- b) A further effect of the change to the main earthworks phase is to move some of the work that would have taken place in Year 2, and push that back into Year 3 and Year 4. This is likely to result in an increase of a few hundred workers during Year 3¹.

1.2.3 Mr Hunt confirmed that it is likely that neither of these changes would affect the timing of requirements related to socio-economic mitigation – the principal mitigation would be the accommodation campus.

1.2.4 **Volume 2, Chapter 9** of the **Environmental Statement (ES)** [APP-195] and the **Accommodation Strategy** [APP-614] – at **Figure 5.1**, assume for the assessment that the Accommodation Campus is delivered at the end of Year 3. The revised Implementation Plan now assumes delivery of the campus in Q3 of Year 3. The change in workforce numbers towards the end of Year 3 does not change that assessment. And the timing of the delivery of the campus is still adequate for the forecast number of the non-home based (NHB) workforce.

1.2.5 Mr Hunt confirmed that – in terms of the representation of the campus delivery and workforce profile set out in **Figure 5.1** of the **Accommodation Strategy** [APP-614] – the programme in that plate does not include a 'Year 0' (in-line with the original **Implementation Plan** submitted with the application (**Planning Statement Appendix 8.4I**) [APP-599] and that the x-axis is not labelled, but confirms that the Accommodation Campus is assumed to be delivered (for assessment purposes) at the end of Year 3 (the third year of construction following commencement of DCO activities).

1.2.6 **The ExA asked that the Applicant submit the detail of these changes to the construction programme at Deadline 5** to help the Panel understand in more detail the work programme and the implications for the effects of NHB workers in terms of accommodation, health provision and gym/amenity provision that the campus brings, and that this will need to include an updated version of **Figure 5.1** of the **Accommodation Strategy** [APP-614]. [SZC Co. has submitted this in detail as part of its **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]

¹ Post-hearing note – following review of the detail underpinning the revised Implementation Plan, it is now clear that the change identified in this paragraph is not likely to occur – as set out in **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51), the change to the Implementation Plan regarding Phase 1 and Phase 2 is definitional, and does not result in a change to the workforce.

- 1.2.7 Mr Hunt noted that the effect of the change would be accounted for through the approach to mitigation, which is largely based on the workforce (which will be monitored) with payments made annually for healthcare, policing and public services for example. The Occupational Health service would be in place from the start of construction.

The local economy, including local businesses and the local supply chain and Employment impacts during construction, and operation, including employment churn

- 1.2.8 The ExA noted that the Applicant had provided detailed responses to questions on the matter at Deadline 2, for example in response to question G.1.24, and that the Councils are largely supportive of the position for home-based (HB) recruitment subject to appropriate governance arrangements being in place.
- 1.2.9 The ExA noted that the differences will come down to how mitigation would be secured, and delivered with appropriate governance, and asked Mr Hunt to update the Panel on the current position on that and discussions between the parties.
- 1.2.10 Mr Hunt set out that there is now not much difference in the position between the parties – the principles are largely agreed, and discussions are ongoing about the extent to which support is provided by the Sizewell C Project in partnership with the public authorities, and what the proper role of the Applicant is in this regard within the planning system.
- 1.2.11 The Applicant's response to the main points raised by Interested Parties is summarised as follows:

With regard to Kelsale-cum-Carlton's Deadline 2 Written Representation [\[REP2-351\]](#)

- 1.2.12 At Deadline 3, the Applicant did not undertake to respond to every submission, and instead responded to issues raised in Local Impact Reports and Written Representations where they were unique.
- 1.2.13 **The Applicant advised that prior to Deadline 5 it would review the Representation referred to and consider whether to submit further written submissions in response to it. *[The Applicant has subsequently reviewed and provided a response to Kelsale-cum-Carlton Written Representations as part of its **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]***

With regard to the economic costs of congestion

- 1.2.14 *[The Applicant has submitted a written response to Suffolk County Council's submission through its **Written Submissions Responding to Actions Arising from ISH2** (Doc Ref. 9.49).]*

With regard to the definition of HB and NHB workers

- 1.2.15 HPQC referred to the definition of HB and NHB workers set out in **Schedule 3** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)).

- 1.2.16 Members of the construction workforce for the Project would be asked to provide information to SZC Co. in a workforce survey. Home-based workers would be characterised as those who indicated the following: (1) they lived within Norfolk, Suffolk, Essex, South Cambridgeshire or East Cambridgeshire immediately prior to obtaining work on the Sizewell C Project; and (2) continue to live within Norfolk, Suffolk, Essex, South Cambridgeshire or East Cambridgeshire on starting work on the Sizewell C Project. Therefore, those who moved within the defined area would continue to be characterised as home-based workers.

- 1.2.17 The Applicant then responded to other points raised by Interested Parties as follows:

With regard to the perceived absence of the business community

- 1.2.18 HPQC noted that one of the features of the planning system is that it is not unusual for those who are likely to receive most direct benefit from the development not to present themselves and have their voices heard at a public forum. Similar circumstances arise, for example, in inquiries concerning the provision of affordable housing.

- 1.2.19 This is not a point that assists the objectors, quite the converse, those local businesses, some of whom may not exist yet, who are likely to profit and benefit from the opportunities provided, are unlikely to be taking the time to present themselves here, which is why they have representative voices such as the Local Enterprise Partnership and the Chamber of Commerce.

With regard to the level of detail in the Supply Chain Strategy

- 1.2.20 The Applicant has at Deadline 3 set out additional detail and commitments within **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) regarding the production of 6-monthly 'Supply Chain Work Plans'.

- 1.2.21 The value of those Supply Chain Work Plans comes from the input that the Applicant will receive from immediate contractors and particularly Tier 1 Contractors. A more detailed level of information will be set out once we have more engagement – and contracts – secured with those contractors,

and as such there is an understandable constraint in the extent to which we can provide detailed action plans for the whole construction phase at this stage.

- 1.2.22 Nonetheless, the Applicant is committed to continued discussions with the Councils to develop a full understanding of the detail that the Councils wish to see to support their activities.

With regard to local and regional benefits

- 1.2.23 There are three sources of local benefits: the jobs that will go to existing residents of Suffolk; the contracts that will go to existing local businesses; and the spending by the workforce.
- 1.2.24 This is expected to be reasonably well-distributed across the area, as demonstrated by the indicative distribution of the workforce set out at **Appendix 9C** to the **ES** [\[APP-196\]](#) which is based on the supply of labour and travel time to site.
- 1.2.25 **Appendix 9C** to the **ES** [\[APP-196\]](#) sets out that around 60% of that HB workforce is expected to be existing residents across Suffolk – so there will be local people who gain employment and the Project will spend with local companies in terms of contracts. Workers – both HB and NHB – will spend money with local retail, community facilities and services.
- 1.2.26 The **Economic Statement** [\[APP-610\]](#) does not compare the Hinkley Point C regional reporting area for supply chain effects with Norfolk and Suffolk – the comparable area is the former Government Office Region of the East of England, which is broadly the same scale as the Hinkley Point C reporting area in terms of the number of jobs and economic output.

With regard to replication from Hinkley Point C (referred to by some Interested Parties as 'lift and shift')

- 1.2.27 The Sizewell C Project is learning from Hinkley Point C and the expertise there – but that doesn't mean that every opportunity will go to a company or a worker that has previously worked on Hinkley Point C.
- 1.2.28 It is wrong to say that Sizewell C will simply shift the supply chain from Hinkley Point C. It is as much about the expertise and the ways of working that we are learning to bring those productivity benefits that an efficiency gains that we need to achieve.
- 1.2.29 There are lots of aspects of this Project which are inherently local and will be done by local firms and local people.

- 1.2.30 The Applicant is in broad agreement here with the Councils – we have committed to a programme of activity to ensure that local businesses are aware of the opportunities available and are able to access support to ensure that they are prepared, and that they understand what the requirements are of our supply chain. A substantial amount of work has happened in this regard already and this will be secured through the **Deed of Obligation (Schedule 7)** (Doc Ref. 8.17(E)), and that will continue to be delivered as main contractors are appointed.

With regard to tourist sector businesses

- 1.2.31 The Applicant takes the risk to tourism very seriously and has worked very hard to get close to an agreement with the authorities on a range of mitigation measures – we are agreed on the principle that there is a need for mitigation and a means of delivering it.
- 1.2.32 The Applicant's position is that the aim of that mitigation is to avoid any loss of visitor numbers by undertaking activities which will ensure that the general public and potential visitors to Suffolk are aware that the area is still *'open to business'*, and that through marketing and other promotional activities, we are able to ensure that the number of visitors is sustained.
- 1.2.33 The Applicant notes that this has been the experience from Hinkley Point C where regular reports to the Socio-economic Advisory Group (SEAG) report that the tourism industry is doing very well, partly as a result of some of that mitigation that has been put in place.

With regard to supply chain 'displacement'

- 1.2.34 The Applicant is mindful that **Paragraph 5.12.7** of the **National Policy Statement EN-1²** sets a threshold for evidence of adverse impacts rather than assertions of risk. Some businesses may give up contracts to gain new contracts on the Sizewell C Project, but the Applicant does not regard it as likely, and even if those businesses did give up contracts, other businesses would pick them up, and the economic activity would continue in the area. This does not result in displacement.

With regard to multiplier effects

- 1.2.35 The Applicant's assessment does not factor in multiplier effects and therefore underestimates the scale of benefits – the assessment is reasonable and conservative in that regard.

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/47854/1938-overarching-nps-for-energy-en1.pdf

With regard to employment churn and 'displacement'

- 1.2.36 The Applicant considers that if an employer loses an employee to the Sizewell C Project, the employer is not likely to consider that that job does not need doing anymore – the business will complete the economic activity by recruiting new, or reallocating/expanding existing resource.
- 1.2.37 Because of the skills interventions set out in **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)), including the Sizewell C Jobs Service that will be made open to those employers who do lose staff, the Project will be assisting in job matching of individuals into those relevant roles.
- 1.2.38 The Applicant considers that it is important to differentiate between risks and likely significant effects. The size of the unemployed or economically inactive labour force is consistently in the tens of thousands across the region as set out at **Plate 5.2** of the **Economic Statement** [APP-610]. The measures set out in **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) are intended to expand the workforce and bring it in to economic activity.
- 1.2.39 In normal times across the country, in every month, about 650,000 people leave a job and about 650,000 people start a job³. This does not require intervention – it is what businesses/people do for the benefit of those businesses/people. This does not mean there is displacement, and a hard-to-fill vacancy does not mean that there is necessarily economic displacement.
- 1.2.40 However, the Applicant recognises that it could create difficulties for businesses, which is why measures set out in **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) include improving support for skills and for job-matching.
- 1.2.41 The Applicant recognises the concerns of Councils and other Interested Parties that there will be increased demand for labour. We do not consider that this is huge at the regional level or indeed at the county level proportionately, but there will be an increasing demand. We are taking steps to ensure that businesses have greater support to backfilling to back filling those vacancies.
- 1.2.42 As such, the effect of 'displacement' is not considered significant.

Estimates of HB recruitment / targets

³ HMRC PAYE Real Time Information (Figure 4) - <https://www.employment-studies.co.uk/system/files/resources/files/IES%20briefing%20-%20Labour%20Market%20Statistics%20June%202021.pdf>

- 1.2.43 The Applicant's response to the Local Impact Report sets out the very conservative nature of what we are doing in terms of building an assessment case for the recruitment of HB workers and the subsequent effects relating to NHB workers, and the mitigation linked to that.
- 1.2.44 As set out in Issue Specific Hearing 2, the Sizewell C Project needs the flexibility to be able to recruit the people it needs in order to deliver the Project.
- 1.2.45 The Applicant is confident that it can reach the estimated HB recruitment number, and in fact, exceed it - but believes it would be inappropriate to fix that as a minimum that must be achieved.

With regard to legacy effects and 'boom and bust'

- 1.2.46 The Applicant is mindful of legacy, and what happens beyond the construction phase. The Sizewell C Project will place temporary contracts during the construction phase, and eventually those contracts will come to an end, at which point it is not proportionate to compensate businesses for when those contracts come to an end. Businesses will enter into contracts in the knowledge that they are not permanent.
- 1.2.47 Nonetheless, the Applicant has committed to deliver positive long term legacy benefits – the Sizewell C Project will leave behind a much more skilled and more productive workforce who have been trained and accredited to nuclear standards. The Sizewell C Project will also leave behind a supply chain which has been accredited to nuclear standards, and will be more productive and able to win other business opportunities in the nuclear supply chain and elsewhere.
- 1.2.48 The Sizewell C Project will deliver accommodation (quantity and quality) improvements through the Housing Fund and will leave more adaptable businesses in an environment that will have seen considerable investment from various funds in terms of physical infrastructure, such as transport and cycling improvements.

With regard to the extent to which the supply chain is local, national and/or international

- 1.2.49 There will be an element of international investment in the area – this is a positive thing and something that the Councils are supportive of in terms of collaborating to facilitate inward investment. Having overseas companies come in bring expertise and employ local people is a key way that we will ensure that there is a more productive local economy and that those benefits are maximised.

- 1.2.50 It should be noted that the vast majority of the project spend is expected to be domestic and significant elements will be local and regional. The Project has made assessments / estimates of the likely regional and local effects but this is not a 'maximum' of what can be achieved.
- 1.2.51 We have estimated about £1.5bn of spending across the East of England in the **Economic Statement** [APP-610] but it is possible that this could be exceeded (and the Sizewell Consortium thinks that it will be) because of the measures that will be taken and the ability of the supply chain to react. We expect very significant economic benefits to flow through to the supply chain because of the scale of the opportunity and the ability of those firms to access it and the high quality of support being delivered by the Suffolk Chamber of Commerce to those firms.
- 1.2.52 The location of a business does not necessarily mean that the benefits will accrue to that area – for example Kier is based in Essex, but will employ people from Suffolk. At a regional level, it is anticipated that a proportion of the benefits would accrue within Suffolk.

With regard to 'lift and shift'

- 1.2.53 The use of skilled labour and contractors with the benefit of experience at Hinkley Point C does not change the assumptions about the HB workforce. Some of the NHB workforce (estimated at 5,900 workers at peak) would transfer from Hinkley Point C.
- 1.2.54 The number of home based workers is based on our understanding of the supply of labour in relevant skills and occupations, the likely demands of the Sizewell C Project and the ability of the Sizewell C Project to meet those different skills needs.
- 1.2.55 Some of those HB jobs are inherently more likely to be filled by local people – for example site services roles, where a subsistence allowance is not paid.

With regard to economic effects on rural communities

- 1.2.56 The ExA asked the Applicant to comment specifically in response to local communities that have raised specific concerns about the impact to rural communities, and how the Project is addressing those concerns.
- 1.2.57 Mr Hunt set out that, in terms of the economic impacts on rural communities:
- a) A Tourism Fund will be put in place to cover a wide area, but to also be spatially targeted.

- b) Specific Resilience Funds will be in place to support specific locations and organisations that are sensitive in the rural economy – including RSPB Minsmere and National Trust Dunwich Heath.
- c) A Community Fund will be available to fund local community projects.
- d) Pure economic activity benefits will accrue and will be focused through the Suffolk Chamber of Commerce in terms of the supply chain, and a wide variety of partners in terms of skills, to enable people from all parts of the region - including those rural areas - to benefit.
- e) Measures will be in place to provide support for people facing barriers to employment and training, which we understand is significant in areas of deprivation including some rural areas in Suffolk.

Tourist Accommodation & Conservatism of Assessment

- 1.2.58 The Applicant set out that provision is made in the **Draft Deed of Obligation** (Schedule 3) (Doc Ref. 8.17(E)) in terms of accommodation and housing.
- 1.2.59 This includes specific provision for boosting the availability of the local tourist accommodation sector to provide capacity in response to the Sizewell C project. There is provision for a Tourist Accommodation Plan, that is to be produced by East Suffolk Council to set out measures that provide additional capacity and support to the tourist accommodation sector.
- 1.2.60 This is part of a carefully thought-out specific suite of measures which are designed to increase capacity. That is not something which is untried and untested, but reflects successful delivery of housing initiatives at Hinkley Point C, and lessons learnt from the remit of the Housing Fund for Hinkley Point C.
- 1.2.61 The evidence from the Housing Fund at Hinkley Point C, is that bedspaces are being delivered at a higher rate and at a lower cost than anticipated.
- 1.2.62 Mr Hunt provided a summary of the assessment of effects on tourist accommodation, noting that:
 - f) The approach to identifying the baseline is conservative – it assumes a fixed level of stock, and reduces the amount of accommodation considered to be available and affordable to workers based on subsistence allowance rates and licencing restrictions.

- g) There are significant parts of the tourist sector that would be completely unaffected by workers in receipt of standard subsistence allowances.
- h) In terms of the overall scale of tourism accommodation markets and the assessment of the worker's use of it, at the peak (of the workforce profile and tourist accommodation occupancy) NHB workers are anticipated to use only 4% of stock in East Suffolk.
- i) These levels of use are short-term and for much of the year will be a benefit to accommodation providers.
- j) Providers would still be getting income, and the workers will still be spending money on many of the same things that tourists do.

1.2.63 The ExA noted that local rates of use of tourist accommodation – in Leiston – could be much higher than the average (4%) – up to 85%. Mr Hunt confirmed that this is the rate of available and affordable accommodation estimated to be used by workers – not the overall stock of accommodation.

1.2.64 The Applicant referred to its **Comments on the Council's Local Impact Report [REP3-044]** – **Chapter 31** which sets out a step-by-step explanation of the conservatism that is built into the assessment in relation to impact on accommodation. This includes an explanation of what has been achieved at Hinkley Point C in these in these various respects.

1.2.65 The ExA raised a concern that the implications of the HB workforce levels estimated by the Applicant not being reached would have further knock on effects, and requested that the Applicant assist with this in a response in writing for the ExA and the councils to understand the degree of confidence from both the assessment and mitigation.

Required skills and education initiatives, skills enhancement packages, prior to and during construction, operation, and post construction

1.2.66 Mr Humphrey (for the Applicant) responded to issues raised under this heading on behalf of the Councils, explaining that:

- a) The Applicant has been working very closely with Mr. Warmington and his team to understand how to appropriately forward plan for our workforce delivery needs, and how best to link those to the wider workforce delivery needs of the region.
- b) This applies not just to the Sizewell C Project, but also for the wider skills infrastructure required for the raft of other infrastructure projects coming forward in the area.

NOT PROTECTIVELY MARKED

- c) The approach to governance and implementation of Workforce Delivery Strategies (WDS) very much has that in mind. They are designed in order to be for planning purposes, but also to be responsive, which is why when we implement them, we commit to review them every three years.
- d) The Applicant is working on the scope of the early Workforce Delivery Plans now, for them to be implementable when the Project commences.
- e) This is limited in part, in that contractors' input will be needed to ensure the workforce intelligence in the strategies is accurate and led by the contractors that will actually deliver the work. Contractors are not yet appointed, but work will commence with the Civil Works Alliance in order to develop scopes.
- f) However, we have the benefit of learning from Hinkley Point C, for example where local contracts are a good guide to the need for workforce linked to project support, logistics, earthworks and early civils construction works.
- g) The Draft **Deed of Obligation** (Doc Ref. 8.17(E)) commits the Applicant to agreeing a timetable for the production of subsequent WDSs with the Councils and other members of the Employment, Skills and Education Working Group from commencement. This relates to the Mechanical, Electrical and Heating and Operational WDSs, for which the workforce will be needed some 5-6 years into the construction phase.
- h) The Applicant recognises the importance of monitoring, and has sought to deliver this through the Workforce Survey (which will identify the HB/NHB split and skill/role of workers) combined with the monitoring of specific, flexible and longitudinal monitoring outputs and Key Performance Indicators (KPIs) that relate to each phase and/or each measure within **Schedule 7** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)), that will be agreed and implemented through the Annual Workforce Delivery Implementation Plans and led by the Regional Skills Co-ordination Function. This enables a nimble approach to identifying bespoke KPIs – for example on apprenticeships, or job starts – and enable the Employment, Skills and Education Working Group to test how effective measures are each year and re-direct them if necessary.

1.2.67 The ExA queried whether the initial WDSs being ready on commencement would be late, and sought to understand how the initial challenges of workforce delivery at the start of the Project would be dealt with.

1.2.68 Mr Humphrey set out that the initial WDSs – for the Site Operations/Site Services/Enabling Works Phases – are secured ‘on or before Commencement’ at **paragraph 2.1.1 of Schedule 7 of the Draft Deed of Obligation** (Doc Ref. 8.17(E)). The Project is already scoping these strategies to be able to implement them on Commencement, but that appointed Contractors will be needed to input to them to ensure the level of detail in them is appropriate to then deliver the roles required in the WDS.

1.2.69 The ExA then referred to **paragraph 9.6.23 of Volume 2, Chapter 9 of the ES [APP-195]**, which sets out ‘strategic priorities’ for the Project, one of which is “*setting realistic DCO commitments and leveraging significant additional value*” and asked for clarification of whether this means there is specific commitment within the drafting of the Development Consent Order.

1.2.70 **The Applicant undertook to review this point in context and respond in writing.** *[This response is provided as part of the Applicant’s Written Submissions Responding to Actions Arising from ISH4 (Doc Ref. 9.51).]*

Tourism impacts prior to and during construction, and post construction, the methodology of assessment and suitability of the Tourism fund

1.2.71 The Applicant responded to the issues raised under this heading on behalf of the Councils and other Interested Parties.

Likely Significant Effects and Principle of Mitigation

1.2.72 SZC Co. and the Councils agree that – as set out in the **Initial Statement of Common Ground [REP2-076]** at **SE25**:

SZC Co’s conclusion is that (Paragraph 9.7.95 in ES Volume 2, Chapter 9) [APP-195]: in some locations, times and for some visitors, there is the risk of a minor to moderate adverse effect to arise on factors that contribute to tourist visitor sensitivity (including but not limited to traffic) that has the potential to be significant at the local level, without mitigation in the early years of construction

1.2.73 As set out in the **Initial Statement of Common Ground [REP2-076]** at **SE25**, it is agreed between SZC Co and the Councils that:

The quantum to this effect cannot be predicted with any confidence in economic terms, there is inherent uncertainty about the extent to which this may occur, and there is an opportunity to tackle perceived changes to certain sensitivities that existing and potential visitors to the area may be concerned about.

- 1.2.74 As such it is agreed that quantifying the effect, especially at a local level, with confidence, is very difficult.
- 1.2.75 As set out in the **Initial Statement of Common Ground** [\[REP2-076\]](#) at **SE41**, it is agreed between SZC Co. and the Councils that the principle and broad scope, governance and implementation of a Tourism Fund to mitigate effects is agreed subject to ongoing discussions on the scale.

Surveys/Consensus of Impact of Project on Tourism/Use of Ex-Ante Stated Preference Surveys

- 1.2.76 HPQC clarified that it was inaccurate for the Councils to suggest there was a consensus on the impact of the Project on tourism.
- 1.2.77 The Applicant also drew the Panels attention to **SZC Co's Comments on the Councils Local Impact Report** [\[REP3-044\]](#), **Chapter 26, Section 26.3** which deals with the Applicant's concerns about the comparability and misinterpretation of the DMO and Ipsos MORI (SZC Co.) surveys and their differences in approach.
- 1.2.78 The Applicant's response set out that the surveys asked whether people are more or less *likely* to visit or not, whether they will or won't visit, and so someone might be less *likely* to visit but still continue to visit. It is methodologically unsound to conclude that there will be a loss of visitors equivalent to the net number of people who consider themselves less likely to visit.
- 1.2.79 Additionally, the Applicant noted that human beings are notoriously poor predictors of future behaviour. Asking people how they are going to behave in several years' time, in response to some information that they have just seen, is an approach that is subject to well-known methodological shortcomings. As a consequence of these methodological limitations, Ipsos MORI, who undertook the Applicant's survey did not attempt to quantify what the impact would be. Instead, what the Applicant was interested in - and the purpose for which the survey was intended - was to understand the pathways by which an impact might happen, and what were the characteristics of people who stated that they were more or less likely to visit.
- 1.2.80 It was clear from the survey results that those who were less likely to visit were those with lower levels of information and lower levels of understanding of the area and the Project and its effects. This speaks to perception issues, but it also gives confidence that mitigation and funding which is targeted at providing people with information is likely to help overcome those concerns.

- 1.2.81 The aim of the Tourism Fund is to keep people visiting, and a combination of methods is set out in the Draft **Deed of Obligation** (Doc Ref. 8.17(E)) to achieve this including through capital projects, marketing and support for attractions and events that will continue to attract visitors. The Applicant has had detailed discussions with The Suffolk Coast Ltd and Councils on the approach to the Tourism Fund and anticipates reaching agreement on the overall approach to and scale of the Tourism fund in the near future.

Evidence from Hinkley Point C

- 1.2.82 The Applicant drew the Panel's attention to monitoring of effects on tourism at Hinkley Point C, acknowledging that there are differences between the areas including the relative proximity of the AONB, but that the relative scale of tourism in Suffolk and Somerset is similar (and in fact slightly more important to Somerset in terms of its share of jobs supported).
- 1.2.83 Relevant information is also set out in **SZC Co's Comments on the Councils Local Impact Report** [\[REP3-044\]](#), **Chapter 26** which notes that despite similar pre-Project survey estimates of effect at Hinkley Point C, no adverse effect has been observed. Attempts to quantify the effects using similar ex-ante stated preference survey techniques estimated that 2,000 jobs and £47m of spend would be lost – this has not happened in reality and monitoring provided to the Socio-economic Review Group suggests that the market has in fact strengthened.
- 1.2.84 The Applicant is reassured – though noting that it is not drawing direct comparisons because the tourism markets do have differences – that based on Hinkley Point C the Tourism Fund appears to be having a positive effect.

New DMO Survey

- 1.2.85 HPQC confirmed that it would respond in writing to the findings of the DMO's most recent survey once it has been provided to SZC Co. for review.

Effects on Mollett's Farm

- 1.2.86 Mr Bull explained that he had spoken to the proprietors of Mollett's Farm recently and provided reassurance that dialogue would continue. A meeting is arranged for 21 July to discuss Mollett's Farm's concerns in more detail and if necessary further develop the appropriate mitigation for the two village bypass.
- 1.2.87 Mr Bull also noted that discussions had been held with Mollett's Farm on opportunities for accommodating the workforce. **The Applicant undertook to update the Examining Authority following that meeting and provide an update at Deadline 5.** *[The Applicant's update is provided as part of the*

Written Submissions Responding to Actions Arising from ISH4 (Doc Ref. 9.51).]

Opportunities for Tourism / Tourism Fund

- 1.2.88 Mr Bull set out - in response to concerns raised on tourism - that there were opportunities for the local area.
- 1.2.89 The off-road bridleway from Sizewell Gap to Eastbridge Road provides safe passage from south of the construction site to the north of it and was one of the initial mitigation schemes proposed. Following the construction of the Sizewell Link Road the B1122 can be re-purposed with a scheme to support more cycling and specifically to link into the emerging Quiet Lane initiative.
- 1.2.90 There is potential to develop a tourism offering with a number of specific circular cycle routes, which are well suited to Suffolk's unique setting with the coastline and particularly the flat topography. This could attract families and cyclists of all ages., assisted by the ongoing uptake of electric bikes. SZC Co. could facilitate this opportunity rather than preclude it and would support the development of a 'cycle the heritage coast' tourism offer.

Effect on rail services and capacity for infrastructure improvements during the construction period

- 1.2.91 Due to Network Rail not being in attendance, the ExA proposed to provide some follow up written questions at the next opportunity to everyone concerned to look to understand better the implications of the Applicant's proposals for rail freight services and the consequential impacts that may (or may not) have, in terms of the Councils' policies for economic development over the next 12 to 15 years.

Monitoring and mitigation measures

- 1.2.92 The Applicant explained that negotiation on these and other related issues is on-going and this will continue until such a point where the Applicant considers that differences are crystallised which are not going to be resolved, at which point those would be articulated in writing to the Panel.

1.3 Agenda Item 3: Community issues

Demographic Modelling (including gravity model) and implications of minor changes in forecasting

- 1.3.1 The ExA noted that much of the concern over community safety comes from the quantity of the workforce and the proportion that would be NHB.

- 1.3.2 The ExA sought assurances that the Applicant can demonstrate that the gravity model is sufficiently robust that it does represent the most conservative position, given that a slight adjustment of inputs leads to a change in outcomes, which then might lead to a shortcoming in the mitigation offered.
- 1.3.3 The Applicant responded that in the course of developing the gravity model, the Applicant has worked with the local authorities to understand and develop its assumptions, processes and limitations.
- 1.3.4 The Applicant noted that, as set out previously and at length in **SZC Co's Comments on the Councils Local Impact Report [REP3-044]**, the assessment is based on very conservative approaches to estimating the number of NHB workers, which is the key input to the Gravity Model. The Applicant ran various different assumptions, but has designed monitoring and mitigation to review where workers are actually living and to be flexible in terms of, for example, responses via changing flexible bus routes and amending management plans.
- 1.3.5 The Applicant confirmed that it will monitor, using the workforce survey, where workers are actually living and within the proposed measures there is resilience to adjust the mitigation in various forms to make sure it is matched to where the workers are, and noted that there is inherent conservatism in the determination of input numbers to the Gravity Model as set out earlier in this hearing.
- 1.3.6 Dr Buroni responded for the Applicant to issues raised by the CCG, explaining that the parties are working towards agreeing mitigation by September and committed to providing an update on progress and any differences for Deadline 5.
- 1.3.7 This is submitted in the form of the updated **Statement of Common Ground** (Doc Ref. 9.10.15(A)) which has a new summary table added, setting out the current position.

Housing and accommodation strategy, including location, size and timing of provision of the accommodation campus and caravan site at the LEEIE

i. **Comments from Interested Parties**

- 1.3.8 The ExA asked at what point has the accommodation assessment identified that there is a need for additional accommodation beyond that which could reasonably be supported by the local community.

- 1.3.9 Mr Hunt clarified that the need for the accommodation campus is not purely mitigation for housing market and public service/community safety effects – it is not driven by what the housing market can ‘*reasonably support*’. The need for an accommodation campus is also driven by the ability to deliver the Project in an efficient, safe and effective manner, as detailed in the approach to a balanced approach to accommodation, which is set out within the **Accommodation Strategy** [APP-613] – see **Section 5.1** in particular.
- 1.3.10 The ExA suggested that the accommodation campus is referred to throughout the Environmental Statement as primary mitigation, rather than the explanation (given by Mr Hunt) that it is a facilitator for the delivery of the project in an efficient manner.
- 1.3.11 The ExA queried at what point - if the accommodation campus was not provided - there would be adverse effects on the local community in terms of housing supply, in order to understand the justification for the scale and location of the campus and the timing of its delivery, and to be confident of it delivering appropriate mitigation for the local community, but not being so large as to be having an undue adverse effect.
- 1.3.12 Mr Hunt noted that without the accommodation campus, the peak effects on the housing market/accommodation supply in the area would be more significant. The campus is secured by the **Implementation Plan** [REP2-044] and forms primary mitigation for these effects (as well as being required for project delivery as set out above).
- 1.3.13 Mr Hunt further set out that the Applicant is seeking a balanced approach to accommodation, seeking a combination of managed accommodation and use of existing capacity in the market in a measured way. The balanced approach to accommodation is introduced at **paragraph 1.1.8** of the **Accommodation Strategy** [APP-613].
- 1.3.14 Mr Hunt confirmed that the Applicant had broadly reached agreement with the Councils that the scale of project accommodation, combined with the scale of the Housing Fund, is in principle able to fully mitigate potential adverse effects (See **Initial Statement of Common Ground** [REP2-076] at **SE28**, **SE29** and **SE40**. Mr Hunt noted that it is difficult to say precisely what the capacity of the housing market is – but that the Applicant has been conservative about assumptions of supply and availability of accommodation.
- 1.3.15 Through consultation the Applicant has settled on 2,400 campus bedspaces and 600 caravan bedspaces, and this has been developed based on changes to the workforce profile and estimated NHB peak (the caravan site was introduced at Stage 2 Consultation, but its size only

developed at Stage 3 Consultation, when the workforce number had been identified to change). It is also based on the physical site constraints and environmental effects related to the proposed site – and this design element has changed throughout consultation too.

1.3.16 The Applicant has submitted a technical report detailing the chronological approach to developing the campus options (**Appendix 5B: Campus Technical Note (to SZC Co's Response to The ExA Q1 AL.1.8)** – part of **Vol 3 – Part 1 of SZC Co Responses to The ExA's First Written Questions** [\[REP2-108\]](#)).

1.3.17 In addition to various points raised by Interested Parties under this heading, the ExA also raised an issue, based on feedback from Interested Parties, regarding the ongoing pressure that could arise on private rented sector and existing housing stock and how that filters down to more vulnerable groups in society, and how that has been properly addressed and to avoid concerns as if they were to arise.

1.3.18 The Applicant responded to the points and questions raised under this heading as follows:

Relationship between the change in workforce numbers and scale of the campus

1.3.19 As set out above, the approach taken to the provision of project accommodation reflects a balance of various factors. For clarification, the scale of project accommodation did change when the workforce number and profile changed through stages of consultation. The scale has been developed based on changes to the workforce profile and estimated NHB peak (the caravan site was introduced at Stage 2 Consultation, but its size only developed at Stage 3 Consultation, when the workforce number had been identified to change).

1.3.20 This will we leave a residual effect in the wider market that needs mitigation, and the Applicant has been discussing this with the Councils and parties are agreed on the principle that the package of mitigation identified is capable of mitigating the effect. The Applicant is confident that agreement can soon be reached on the scale of mitigation (via the Housing Fund).

The extent to which the Housing Fund will deliver additional bedspaces

1.3.21 Mr Hunt referred to **Section 31.2(d)** of the Applicant's **Comments on Councils' Local Impact Report** [\[REP3-044\]](#) which summarises from experience at Hinkley Point C, the evidence for reliance on delivery of bedspaces through the Housing Fund. The rest of **Section 31.2** of that

document sets out the approach to conservatism both in terms of demand and supply of accommodation that are inherent within the assessment of effects (and subsequent design of mitigation).

Delivery of campus accommodation (timing, phasing)

- 1.3.22 HPQC confirmed that written submissions on this point discussed at Issue Specific Hearing 1 would include whether it would be appropriate for the delivery of the accommodation campus to be secured in the DCO by reference to a long-stop date or a cap on the number of workers. *[This is contained in the Applicant's **Written Submissions Responding to Actions Arising from ISH1** (Doc Ref. 9.48).]*
- 1.3.23 HPQC reminded the ExA of Mr Rhodes' explanation at Issue Specific Hearing 1 that SZC Co. needs to provide the accommodation campus by a particular point in the construction sequencing in order to deliver the Project. This is a strong practical incentive for delivery. *[Further detail is contained in the Applicant's **Written Submissions Responding to Actions Arising from ISH1** (Doc Ref. 9.48).]*
- 1.3.24 The ExA was also invited to consider what the appropriate enforcement action would be in the event that SZC Co. had not provided the accommodation campus despite this strong incentive and having used reasonable endeavours in accordance with the **Draft Deed of Obligation** (Doc Ref. 8.17(E)), and specifically whether in those circumstances it would be in the public interest to require the Project to cease development or extend the construction period through reducing the number of workers. If such enforcement would not be appropriate or in the public interest, then it is unclear how imposing such a control would be effective or preferable to alternative securing mechanisms.
- 1.3.25 In this context, HPQC referred to the submissions of Mr Rhodes at Issue Specific Hearing 3 (Doc Ref. 9.43) on the weight to be applied to the question of urgency in accordance with government policy. He drew specific attention to what was dealt with in paragraphs 3.3.6 and 3.3.7 of the **Planning Statement** [\[APP-590\]](#) As set out in those paragraphs, if a proposed new nuclear power station cannot demonstrate deployment by 2035, then it would not be a project that falls within the scope of the proposed new NPS. The significance of the 2035 date for deployment of new nuclear power stations such as Sizewell C should not therefore be in issue. The Government had made it clear that this was a matter of such public importance that projects not capable of deployment by that date would not benefit from the new NPS. It had also stated that only those sites, including Sizewell C, listed in the current EN-6 are considered likely to be able to deploy prior to 2035. The delay to completion of the Project to

after 2035, and any controls which are likely to have that impact, should therefore be considered against that backdrop and the very important public interest consideration of commencing operation before that date. Any party suggesting additional controls on implementation which would give rise to material delay to delivery needed to confront and address those implications in seeking to show that this was in accordance with the Government's policy approach to the imposition of requirements.

- 1.3.26 Mr Rhodes added that there are practical issues about how best to deliver the campus, and all parties have the same intention of delivering the campus early without causing housing stress in the local market. The Applicant will look at and examine different mechanisms with the Council and provide an update at Deadline 5. *[An update is provided as part of the Applicant's **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]*

Pressure on the PRS and Vulnerable Groups; Care Homes

- 1.3.27 Mr Hunt confirmed that this issue are largely responded to within **Chapter 4** of The Applicant's **Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021** [\[REP2-130\]](#) including evidence from Hinkley Point C regarding housing market stress indicators (of vulnerability to housing need and homelessness).
- 1.3.28 The performance of the housing market around Hinkley – also presented in an evidential way at **Chapter 4 (Part 4.2(b))** of The Applicant's **Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021** [\[REP2-130\]](#) sheds some light on the potential likely effects on people vulnerable to housing need, identifying that it is negligible. Nevertheless the Applicant recognises there is a risk of localised and differential effects based on individual circumstances and therefore has committed to supporting the resilience of East Suffolk Council's housing need and homelessness prevention services through a 'resilience' element of the Housing Fund (Housing and Homelessness Resilience Measures) set out at **Schedule 3, Paragraph 2.9** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)).

Similarities between HPC and SZC Housing Markets

- 1.3.29 Mr Hunt confirmed that within **Chapter 4 (Part 4.2(c))** of The Applicant's **Written Submissions in Response to Oral Submissions made at Open Floor Hearings 18-21 May 2021** [\[REP2-130\]](#) set out the comparability of the housing market around Hinkley Point C and Sizewell C, drawing particular attention to **Figure 4**.

- 1.3.30 This summarises that based on a 45-minute travel time from Hinkley Point C (the area which encompasses most of the observed NHB worker distribution and which includes Bridgwater at the very edge), the comparative area around Sizewell C has very similar number and characteristics (type, tenure) of accommodation. Sizewell's market has more mid-sized settlements closer to the site; Hinkley Point C has mostly small villages and hamlets with the larger settlement of Bridgwater comparatively further from the site.

Influx of non-home based workers and Emergency services impacts, and implications for community safety

- 1.3.31 ExA asked the Councils (including Public Health at SCC), Clinical Commissioning Group(s), Leiston Town Council and Suffolk Constabulary (with other emergency services) to raise any issues with regard to possible implications on community impacts and the emergency service impact.

i. *Comments from the Applicant*

- 1.3.32 In response to points raised, the Applicant set out the following:

Securing the Worker Code of Conduct

- 1.3.33 HPQC explained that it is not opposed in principle to compliance with the Worker Code of Conduct being secured through an appropriate legal mechanism and is willing to discuss this with East Suffolk Council. He noted, however, that SZC Co. did not consider that this would be best achieved through a Requirement imposed on the Development Consent Order.

Journey Times and Emergency Services

- 1.3.34 HPQC submitted that Ms McMullen has addressed concerns in relation to journey times and the impact on emergency services at Issue Specific Hearing 3 (Doc Ref. 9.43). SZC Co.'s position is that there will be no impact on journey times on the roads and so there would be no impact on the emergency services response times. HPQC confirmed that a written submission on the impact of journey times on emergency services would be provided at Deadline 5. *[A written submission is provided as part of the Applicant's **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]*

Police and Community Safety

- 1.3.35 Mr Hunt noted that the Applicant has engaged with Suffolk Constabulary over the pre- and post-application period has made significant progress in

understanding the appropriate approach to providing additional resourcing to the Constabulary.

- 1.3.36 Mr Hunt noted that the parties have reached agreement on the estimate for potential number of non-crime incidents related to the Sizewell C Project, and the general approach to the nature of the resourcing that is required (for example, a presence for a Neighbourhood Response Team (NRT) in Leiston). These points of agreement are described more fully in the **Draft Statement of Common Ground** between the Applicant and Suffolk Constabulary submitted at Deadline 5 (Doc Ref. 9.10.17(A)).
- 1.3.37 There remains a difference between the parties on the scale of resourcing required, which relates to the points that have been discussed about the importance of the demographic of the workforce and the lessons we can learn from experience at Hinkley Point C.
- 1.3.38 The Applicant acknowledges that there will be an increase in temporary NHB workforce that will increase incidents – though there is substantial embedded and additional mitigation for these potential effects.
- 1.3.39 Mr Hunt raised that there needs to be a recognition that the NHB construction workforce are hard working men and women, many of whom are highly specialised and skilled workers who are focused on their work and will be supported through a variety of measures of workforce management and support that the Sizewell C Project will put in place (and have been demonstrably successful at Hinkley Point C).
- 1.3.40 There is an assumption from Suffolk Constabulary (as set out in their model of potential crime and non-crime rates and resourcing) that only age and gender matters in estimating the scale of crime and non-crime activity – we would challenge that as set out in **Chapter 16** of the Applicant's **Comments on Written Representations** [[REP3-042](#)].
- 1.3.41 The Applicant considers that Suffolk Constabulary's model is missing the very significant nature of the mitigation measures and the characteristics of the workforce beyond age and gender. The proposed measures would reduce the burden on public services (for example mental health services) and set out expectations of behaviour, acting as a deterrent, through the Worker Code of Conduct and regular random drug and alcohol testing.
- 1.3.42 Nevertheless, the Applicant understand the concerns and parties are agreed that there is a need for support for community policing and additional resources.
- 1.3.43 Laura Robinson-Brown, Sizewell C's Security Manager, explained that the Sizewell C Project is operating in a post 9/11 security environment (noting

the special security significance that a nuclear project has) so the security regime and controls have evolved from what was in place for the Sizewell B project and construction phase.

- 1.3.44 For Sizewell C a graded approach would be taken during construction, which means that security controls would increase as sensitive material, which includes information and assets, arrives on site. However, that does not mean that appropriate controls would not be put in place at the start of construction, as these are required to ensure workforce trustworthiness and prevent the pre-positioning of malicious threats.
- 1.3.45 The project security regime which extends beyond the geographic boundaries of the construction site would adopt an integrated and interlocking combination of personnel, information, physical and supply chain security, underpinned by a robust nuclear security culture. It is important to note that project culture is a fundamental piece of the security architecture for the Project and this links closely with the implementation of the workers code of conduct.
- 1.3.46 The personnel security regime is formed from initial pre-employment checks followed by ongoing personnel security (aftercare) arrangements.
- 1.3.47 Within the personnel security regime; the ongoing personnel security (aftercare) arrangements will be absolutely critical in enabling Sizewell C Project to manage workforce trustworthiness. Sizewell C project meets ONR requirements for caveat management, which would be additionally supplemented by SZC Co. specific caveats that mirror what currently takes place at Hinkley Point C Project.
- 1.3.48 These would include pre-employment checks and where the role requires UK security vetting (UKSV) (noting that the two do not mean the same thing and are not interchangeable). On the construction site pre-employment checks are comprised of the confirmation of identity including date of birth (DoB), right to work and nationality, proof of residency, government issued photographic identification and a criminal records self-declaration, which is a statement of previous offences and unspent convictions, as the minimum. This self-declaration would be subject to an assurance process, so a number of declarations would be checked and confirmed. Experience from Hinkley Point C indicates that in the majority of cases, people do not lie and that they are very honest and upfront about previous offences.
- 1.3.49 Baseline Personnel Security Standard (BPSS) is the next level-up of pre-employment check and this includes a UK gov Disclosure and Barring Service (DBS) criminal records enabled check in addition to greater scrutiny of working history over a three year period. At Hinkley Point C, out of 8,000

applicant cases taken over a period of 5 years, only one person has been refused employment with the project on the grounds of the results of a criminal records check.

- 1.3.50 On SZC project BPSS, UKSV and ongoing personnel security (aftercare) arrangements are aligned with HMG policy framework to establish and maintain workforce trustworthiness and ensure people who have access to sensitive assets including the supervision of other people, are competent to do so.
- 1.3.51 In summary, SZC Co.'s view is that the pre-employment and UKSV checks combined with ongoing personnel security (aftercare) constitute a high standard of due diligence and ethical practice based on facts rather than opinion. If SZC Co. were to raise the standard of minimum pre-employment checks, it is not considered that this would be proportionate or confer any further community safety benefit.
- 1.3.52 SZC Co. has developed a security risk profile, based on operational experience from Hinkley Point C and threat intelligence received from Her Majesty's Government (HMG) and Civil Nuclear Constabulary Special Branch (CNC SB). Due to the early stage of the security team establishment for Sizewell C, it has not incorporated Suffolk Constabulary threat intelligence. Going forward when resource permits, it is anticipated that local threat intelligence would be incorporated as part of threat assessment into the project security risk profile, enabling the Project to adapt its security regime if required. The project security risk profile would also be shared with Suffolk Constabulary with a view to identifying opportunities to jointly pursue security outcomes, where appropriate to do so.
- 1.3.53 Suffolk Constabulary's concern regarding not being able to share information on incidents off-site, that the Project could then use to enforce the Worker Code of Conduct (including to make decisions about whether worker should continue to be employed on the Project) is noted. The potential value of data sharing between the police and the Project is recognised and these difficulties are still being addressed at Hinkley Point C. Part of the challenge is being able to define a clear policing purpose for the sharing of what could be considered to be intelligence, and also engages General Data Protection Regulations 2018 (GDPR, 2018) and Human Rights Act 1998 (HRA, 1998) (Article 8 and 14); a concern for both parties and is something that the Sizewell C Project is willing to explore for the future.
- 1.3.54 It is anticipated that SZC Co. and Suffolk Constabulary are likely to be able to share information where it relates to the protection of life and the prevention, detection, investigation and prosecution of terrorist offences

and serious crime. Serious crime as defined under the Serious Crime Act 2015 (SCA, 2015) means; drug trafficking, human trafficking, organised illegal immigration, child sexual exploitation, high value fraud and other financial crime, counterfeiting, organised acquisitive crime and cyber-crime.

- 1.3.55 Sharing data in relation to other matters of community concern such as antisocial behaviour, assault and drink driving become more difficult; but it is certainly something that SZC Co. can explore with the police.

Public Services and Influx of Workers in Leiston

- 1.3.56 Mr Humphrey set out that the Applicant has been working closely with service providers and is proposing a package of measures across the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) – including the Housing Fund at **Schedule 3**, the Public Services Resilience Fund at **Schedule 5**, and the Community Fund at **Schedule 14** to reduce risks and mitigate effects (where relevant) by providing resilience.
- 1.3.57 Measures are focused on Leiston, but are designed to be flexible and applicable across a much wider area (where NHB workers may live) and released over the period of NHB worker growth and utilising monitoring via the Workforce Survey (every six months).
- 1.3.58 The measures are responsive and precautionary, and can be directed through governance proposals (including for the Community Safety Working Group and the Accommodation Working Group) to places where the effects can be most greatly felt. All relevant emergency services and the Councils would be members of respective relevant groups, and the Applicant recognises that it is important to have a clear line of sight between those groups. As heard from Interested Parties today, and as we've set out in the governance structure under the Social Review Group, it is clear that there is overlap, and the ability to respond on a multi-agency basis to some of those issues.
- 1.3.59 The Applicant's approach to flexible, responsive and precautionary socio-economic mitigation applies to **Schedules 3, 4, 5, 7, 14 and 15** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)).
- 1.3.60 With regard to specific issues of public services and community infrastructure in Leiston – the Applicant has set out the approach and responded to Interested Parties in response to examination questions **AR.1.29** and **AR.1.33** – see **Responses to the Examining Authority's First Written Questions [REP2-100]**. It was explained that SZC Co. is very grateful for the support and collaboration with both Leiston Town Council and Suffolk County Council in particular.

- 1.3.61 In terms of the Public Services Resilience Fund, as set out in **SE42** and **SE43** of the **Initial Statement of Common Ground** [REP2-076] the Applicant and Councils are broadly agreed on the principle and largely autonomous role of the Councils to deliver these funds to different issues and locations.
- 1.3.62 In terms of the Community Fund, the Applicant drew attention to www.hpcfunds.co.uk which sets out some clear examples of how the Community Fund employed Hinkley Point can support small and large local projects and investments, that have significant legacy effects, and can be accessed by the communities and managed by the communities that need them most, and would benefit most from support for residual intangible impacts that might not be mitigated elsewhere.
- 1.3.63 With regard to demand for formal sports facilities, the Applicant has assessed potential net additional demand from the NHB workforce at **Appendix 9E to Volume 2, Chapter 9** of the **Environmental Statement** [APP-196], and concluded that the demand as a result from our workforce is not significant.
- 1.3.64 The provision of sports facilities in Leiston - as part of a suite of public services and community infrastructure - is about promoting community integration and cohesion, rather than mitigating an actual observed effect through the years on demand for sports facilities.
- 1.3.65 With regard to the influx of workers in Leiston:
- The Applicant predicts that there would be 3,689 workers at the peak in Leiston;
 - 3,000 of those workers will be living in the project accommodation (the onsite accommodation campus and the caravan site).
 - That leaves around 700 workers, of which half would be living in owner-occupied accommodation or tourist accommodation and so would not represent an additional effect on the population of Leiston.
 - The remainder would be in the private rented sector. Some of them may be considered to be additional to the area - if they live in an accommodation that has been brought forward through the Housing Fund or living in rented accommodation that would otherwise be unoccupied.

- The additional peak population represents less than 5% of the total population of Leiston as estimated by the Office for National Statistics in 2019⁴.
- It should be noted that this represents the peak – a matter of months in the peak year. On average, those numbers (above) would be 44% of that level.

1.3.66 For reference – the figures above are derived from **Volume 2, Chapter 9** of the **ES** [APP-195] and specifically **Table 9.42, Table 9.40, Table 9.43, Table 9.44.**

Public Health

1.3.67 Dr Buroni on behalf of the Applicant provided a response on four key items raised by Interested Parties:

- It is recognised that local health care is sensitive to change. This is why SZC Co. has consistently considered all local healthcare provision highly valuable and sensitive to any change in the assessment.
- The needs of the incoming non-home based work force must be addressed - SZC Co.'s approach is to internalise it. This would start from the onset of the project through the Sizewell C health service provision, with the scale of provision based on head count [*Post-hearing note: the occupational health service would be provided within the temporary construction area so would be open from the start of construction; it is not reliant on the campus opening*]. Workers would be screened and their age/sex demographic is considered as part of this, as they can present a range of health conditions and risks that can be proactively screened for and addressed (delaying and preventing the need for more reactive public health care). The service would be open to the entire workforce. For home based staff therefore, this comprises complementary access to health services over and above what could be reasonably expected from any other employer locally. As well as screening, there would be a GP-led health clinic on site, plus a pharmacy, physio treatment and links into wider health campaigns so home-based or not, any health concern workers have, they could book an appointment on site. This draw from and builds upon the occupational health care provision provided at HPC, where the referral rates for non-home-based staff outside of the occupational health service are insignificant, while the

⁴ www.nomisweb.co.uk

complementary provision for home-based workers reduces demand on local health care.

- In terms of sexual health, sexual health provision would be included within the occupational health service [*Post-hearing note: SZC Co. is speaking to SCC about sub-contracting their sexual health services to ensure aligned provision between the Project and the wider community*].
- Finally, public health is not static so a robust, flexible, resilient service is needed. That is the purpose of ongoing engagement - it is not just minimising health risk but aligning with and supporting wider health promotion initiatives and opportunities, noting that common ground is still being agreed

- 1.3.68 The ExA then further asked for clarification (in writing following the hearing) in reference to the provision of the health services starting as the workforce arrived – the Applicant was asked to provide a reference for where that is set out within the application documents such that the examining authority can rely with its provision within that time frame. [*The Applicant has provided a response as part of its **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).*]

Sports and recreation provision and assessment

- 1.3.69 The ExA noted that the assessment identified a significant focus on the football pitch provision. They queried how those construction workers who were not interested in sport may spend their leisure time, and if there are any subsequent effects on the local community.
- 1.3.70 Mr Humphrey explained that the formal assessment within **Volume 2, Chapter 9** of the ES [APP-195] covered the assessment of formal sport and recreation activities, and is accurate to the scope of the assessment as set out in the **Scoping Report** [APP-168] having had regard to the **Scoping Opinion** [APP-169]. Mr Humphrey sought clarity from the Panel on what additional leisure activities (i.e. beyond the scope set out in the Scoping Report) the Panel thinks should be assessed, and noted that **Volume 2, Chapter 9** of the ES [APP-195] has regard to other statutory services such as libraries and other cultural activities, which workers might undertake.
- 1.3.71 Mr Humphrey noted that beyond this assessment, the leisure activities of workers would either be informal (assessed through **Volume 2, Chapter 15** of the ES [APP-267]), so may be covered through a subsequent hearing on Public Rights of Way, or it may be related to the commercial provision of leisure activities, such as cinemas and restaurants, which are essentially driven by economic demand and supply for those activities.

- 1.3.72 The ExA noted that the timing of the provision of the sports facilities seems to be linked to the provision of the accommodation campus, and considered that until it is in place, it does not provide any mitigation, and queried what the effect would be in the interim.
- 1.3.73 Mr Humphrey clarified that the assessment provided at **Appendix 9E of Volume 2, Chapter 9** of the ES [APP-196] provides a view on the peak effects, which are negligible, and pre-peak effects would also be negligible – in fact the net effect when considering the delivery of sports facilities in Leiston would be beneficial.
- 1.3.74 The Applicant undertook to respond in writing with regard to the query raised by the Panel on NHB workers demand for other leisure facilities. *[The Applicant has provided a response as part of its **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]*
- 1.3.75 HPQC explained that the delivery of the Leiston Sports Facilities is controlled by **Schedule 10** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E)). This deals with the design, construction, management and maintenance of the Leiston Sports Facilities. There is a considerable degree of control and involvement by East Suffolk Council in the timing and method of the delivery of the Leiston Sports Facilities. SZC Co. will pay the contribution for the design of the Leiston Sports Facilities on or before Commencement. East Suffolk Council's design must include a timetable demonstrating that the Leiston Sports Facilities will be completed at an 'appropriate' time, having regard to the timing of the proposed occupation of the accommodation campus as set out in the Implementation Plan. There is then a control on the timescale within which SZC Co. will make an application to East Suffolk Council to discharge the associated requirement of the DCO. Once the requirement has been discharged, SZC Co. will pay the contribution associated with construction within an agreed timeframe.
- 1.3.76 It was noted that were there to be a disagreement about the 'appropriate' date for delivery of the Leiston Sports Facilities, this dispute would be resolved in accordance with the mechanisms for resolving these set out in the **Draft Deed of Obligation** (Doc Ref. 8.17(E)).

Monitoring and mitigation measures

- 1.3.77 HPQC submitted that SZC Co. has engaged in ongoing and very productive negotiations with Suffolk Constabulary to agree the scale of the effect. This will then enable the appropriate sums of the contributions to be identified. SZC Co. hopes these will narrow or resolve through ongoing discussions by no later than September 2021 when it is anticipated that a **Deed of**

Obligation including proposed figures for the funding and contributions will be submitted.

- 1.3.78 HPQC also noted that the concerns raised about governance were being discussed with the police and would be responded to in writing if this cannot be resolved between the parties. It was explained the proposed controls on the use of the Emergency Services Contingency Contribution (in **Schedule 5, Paragraph 4.3** of the **Draft Deed of Obligation** (Doc Ref. 8.17(E))) need to be considered with reference to the subject matter of the contribution itself, which is limited to public services initiatives which Suffolk Constabulary, or the other emergency services, decide to conduct where the need for such an initiative is directly attributable to the Project.

i. Blight

- 1.3.79 The issue of property blight and compensation was raised by Interested Parties

- 1.3.80 HPQC. referred to the separate Property Price Support Scheme which has been provided by SZC Co. in addition to any obligations relating to statutory blight and stated that a written explanation of the differences and interaction between those two methods of addressing this issue would be provided at Deadline 5. *[The Applicant's response is provided as part of the **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]*

ii. Governance

- 1.3.81 ExA asked that a written explanation be provided by SZC Co. on the obligation for the undertaker to attend governance groups in order for these to be quorate under the draft **Deed of Obligation** (Doc Ref. 8.17(E)).

- 1.3.82 HPQC noted the concerns raised in respect of community involvement in the governance groups and SZC Co. agreed to provide a written explanation of the proposals under the **Draft Deed of Obligation** (Doc Ref. 8.17(E)) and as part of that to address the issue of quorum at Deadline 5. *[The Applicant has provided a response as part of its **Written Submissions Responding to Actions Arising from ISH4** (Doc Ref. 9.51).]*

1.4 Additional Mitigation

- 1.4.1 HPQC confirmed that there were to be ongoing discussions with East Suffolk Council in respect of their requested additions to the mitigation being proposed and stated that written submissions on any differences requiring the attention of the Examining Authority would be provided in due course if needed.