



# The Sizewell C Project

## 9.97 Responses to the ExA's Third Written Questions (ExQ3) Volume 2 - Appendices

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## APPENDIX 4A: RESPONSE TO EXAMINING AUTHORITY'S QUESTION HW.3.1

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## CONTENTS

1	RESPONSE TO EXAMINING AUTHORITY'S QUESTION HW.3.1 ....	1
1.1	Introduction .....	1
1.2	SZC Co Response .....	1

## TABLES

Table 1.1: MENE Survey Responses 2009 to 2019 – Number of Visits by Place, for All Respondents and those with similar (albeit not identical) characteristics to SZC workers:.....	5
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## PLATES

Plate 1.1: Screenshot from the MENE dataset for Suffolk.....	3
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## FIGURES

None provided.

## APPENDICES

None provided.



## 1 RESPONSE TO EXAMINING AUTHORITY'S QUESTION HW.3.1

### 1.1 Introduction

#### 1.1.1 SZC Co note that the following concerns have been raised by the National Trust regarding SZC Co's approach to estimating the number of workers who may undertake informal recreation in sensitive areas within the natural environment (**National Trust Written Representation** submitted at Deadline 2 [[REP2-150](#)]):

- *A 'mid-range' estimate (between what is uncertain) has been set at around 10% to represent the likelihood of campus, private rented sector and tourist accommodation-based workers (who do not have dogs with them – this is 4,800 workers) visiting outdoor informal recreational resources around Sizewell once a week.*
- *The 10% figure is then multiplied to reflect a theoretical number of annual visits and adjusted down to allow for shift patterns and holidays.*
- *The National Trust believes this is too low.*
- *The 2018/19 MENE report (Monitor of Engagement with the Natural Environment: Headline report and technical reports 2018 to 2019) states 65% of adults spend time in the natural environment at least once a week.*
- *The use of this figure would clearly increase the number of estimated visits to Dunwich Heath by the construction workforce without dogs by 6.5 times.*

### 1.2 SZC Co Response

#### a) Deadline 3 Submission

#### 1.2.1 As set out in **ExQ1, AR.1.12, Response by SZC Co. to Consultee Responses to Deadline 2, Appendix 6A** [[REP3-047](#)] (paragraph 3.1.21):

- *SZC Co. considers the 10% is a suitable estimate to represent the likelihood of campus, private rented sector and tourist accommodation-based workers who do not have dogs (estimated 4,800 workers at peak) being likely to visit outdoor informal recreation resources around Sizewell once per week.*

- *The 10% estimate is described at paragraphs 3.3.12 to 3.3.15 of the Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148]).*
- *The estimations of numbers of construction workers visiting European sites are broad estimates and not precise numbers.*

1.2.2 The following provides an explanation in greater detail to that given above or in the **Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [APP-148])**.

b) Comments on us of MENE Survey

1.2.3 The MENE survey helps to set a benchmark for visits to the natural environment per week – this includes people from all social and working groups of the national population, and relates to visits to all types of green open spaces in and around towns and cities as well as the wider countryside and coastline, including places that are not relevant to the European Sites (e.g. children's playgrounds, villages, parks in towns or cities and playing fields), at a national level.

1.2.4 The National Trust are correct in that the 2018/19 MENE Report (Monitor of Engagement with the Natural Environment)<sup>1</sup> states that nationally 65% of adults in England normally visit the natural environment at least once per week (MENE report page 7).

1.2.5 However SZC Co note the following mitigating circumstances and details that should be taken into account when using these figures.

i. Most workers don't have dogs – the MENE survey is weighted against those workers

1.2.6 The MENE report states that 70% of visits to the natural environment nationally were walking, with 40% of these walking with a dog (MENE report<sup>2</sup> Figure 13 page 14).

1.2.7 The 4,800 construction workers at peak would be without dogs and would therefore walk less regularly on average than the national average of 65%

<sup>1</sup> Monitor of Engagement with the Natural Environment (MENE), Upper Tier Local Authority Dashboard, Available online from: [Monitor Engagement Natural Environment 2018 2019 v2.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944442/monitor_engagement_natural_environment_2018_2019_v2.pdf) [Accessed: 18 June 2021] (Also appended to the National Trust's Written Representation submitted at Deadline 2)

<sup>2</sup> Monitor of Engagement with the Natural Environment (MENE), Upper Tier Local Authority Dashboard, Available online from: [Monitor Engagement Natural Environment 2018 2019 v2.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/944442/monitor_engagement_natural_environment_2018_2019_v2.pdf) [Accessed: 18 June 2021] (Also appended to the National Trust's Written Representation submitted at Deadline 2)

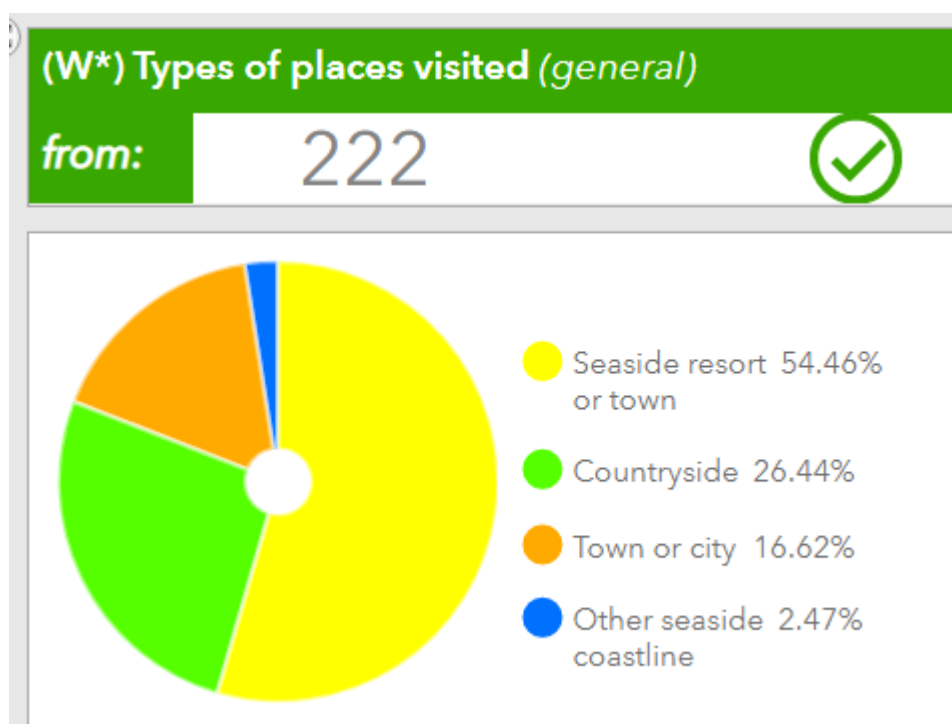
of adults in England, which includes those undertaking regular (e.g. daily) dog walks.

- ii. The 65% doesn't disaggregate urban and rural environments, or sensitive/non-sensitive environments, or formal recreation environments

1.2.8 The MENE report states that at a national level an average of 52% of these visits were to town or city locations, 36% to countryside locations and 12% to coastal locations (MENE report<sup>3</sup> Figure 3 page 9).

1.2.9 The MENE dataset provides further detailed regional information stating that, for the latest data provided for 2018-19, within Suffolk 54.46% of visits were to seaside resorts or towns, 26.44% were countryside visits, 16.62% were town and city visits and 2.47% were visits to other seaside coastline locations<sup>4</sup>.

**Plate 1.1: Screenshot from the MENE dataset for Suffolk**



<sup>3</sup> Monitor of Engagement with the Natural Environment (MENE), Upper Tier Local Authority Dashboard, Available online from: [Monitor\\_Engagement\\_Natural\\_Environment\\_2018\\_2019\\_v2.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942444/monitor_engagement_natural_environment_2018_2019_v2.pdf) [Accessed: 18 June 2021] (Also appended to the National Trust's Written Representation submitted at Deadline 2)

<sup>4</sup> <https://defra.maps.arcgis.com/apps/MapSeries/index.html?appid=2f24d6c942d44e81821c3ed2d4ab2ada> (accessed 13 July 2021)

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- 1.2.10 Therefore, within Suffolk approximately 29% ( $26.44\% + 2.47\% = 28.91\%$ ) of total visits would be to rural locations such as the European sites within the vicinity of Sizewell C that construction workers might visit.
- 1.2.11 A worked example is provided below to show how this relates to this group of construction workers without dogs being likely to visit outdoor informal recreation resources around Sizewell once per week, using a sample of 100 construction workers to enable the calculations to be easily followed.
- Out of 100 construction workers, using the national average 65%, 65 would visit the natural environment at least once per week.
  - Of these 65 workers 28.91% are assumed to visit informal, rural locations such as European sites, based on the data for Suffolk ( $(65/100) * 28.91 = 18.79$  workers), a figure of approximately 19 workers.
  - Using these figures the MENE 2018/19 data would suggest that approximately 19 in every 100 construction workers, or 19%, could visit outdoor informal recreational resources around Sizewell at least once a week.
- iii. The 65% does not account for demographic or lifestyle characteristics
- 1.2.12 Due to the very specific nature of the construction worker demographic for non-home based (NHB) construction workers, we have used the recorded demographics to analyse the survey results of individuals closely aligned with their NHB worker characteristics.
- 1.2.13 This being respondents who are working full time (30+ hours a week), live in a household of one person and that live in private rented accommodation.
- 1.2.14 Question 2 of the MENE survey asks the “*General type of place where most time during the visit was spent*” with four potential answers: ‘in a town or city’, ‘in a seaside resort or town’, ‘other seaside coastline’ or ‘in the countryside’.
- 1.2.15 From this we can establish where the visits from this cohort were most likely to take place. The responses show that the majority of visits (4,288) were taken to a town or a city.
- 1.2.16 In contrast, 2,823 visits were made to the countryside and 218 were made to other seaside coastline, the two typologies that most closely align with the sensitive areas surrounding Sizewell.

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**Table 1.1: MENE Survey Responses 2009 to 2019 – Number of Visits by Place, for All Respondents and those with similar (albeit not identical) characteristics to SZC workers:**

MENE Survey Responses 2009 - 2019							
General type of place where most time during the visit was spent		All	All	In a town or city	In a seaside resort or town	Other seaside coastline	In the countryside
Working Status (specific)		All	F/T 30+ hrs				
Total household size		All	1				
Housing Tenure		All	Rent private				
Number of visits taken by the respondent over the previous seven days	0	270,195	3,990	3,990			
	1	76,990	1,166	660	120	40	346
	2 - 5	72,724	932	527	86	30	289
	6 - 10	40,683	433	241	32	11	149
	11 - 15	5,547	44	20	3	2	19
	16 - 20	786	8	5	0	0	3
	21 - 25	1,016	13	3	0	0	10
	26 - 31	429	4	1	0	0	3
Total Responses		468,370	6,590	6,590			
Total Visits		693,740	7,937	4,288	608	218	2,823

1.2.17 The inference from the above table suggests that:

- 58% of respondents (overall) didn't visit the natural environment over the last seven days.
- This increases to 61% of people whose demographic and housing characteristics more closely matches the SZC NHB workforce.
- So as a maximum, in fact only 39% can be expected to visit the natural environment once per week or more often.
- Of this 39%, around two thirds visited open spaces in a town or city or in a seaside resort, with the remaining 35% visiting the coastline or countryside around and outside of urban areas – akin to the sensitive natural environments around Sizewell C.
- This translates to 14% of SZC NHB workers being expected to visit natural environments around Sizewell C at least once per week, which may include European sites. It is noted that some will visit more often – though the table suggests that only half this proportion would visit

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more than once per week, with exponentially diminishing proportions of frequent visits.

1.2.18 This analysis still presents a very worst-case estimate. It does not account for the unique working, socio-economic and demographic characteristics of the workforce, the shift/working and 'return home' patterns of the workforce, access to facilities in Leiston and at the Accommodation Campus provided by the Project, and the likelihood for workers to seek more formal forms of recreation.

1.2.19 Factoring the working pattern, lifestyle and characteristics of construction workers, and the fact that the national percentage includes a large proportion who are dog walkers who would visit more often than construction workers who would not have dogs with them, as described at **paragraphs 3.7.5 to 3.7.7** of SZC Co.'s **Response to ExQ1 AR.1.12, Chapter 6 Appendix 6A**, submitted at Deadline 2 [[REP2-108](#)], this figure would be lower than 14% or 19%, and 10% is a reasonable precautionary assumption.

iv. The assessment uses the peak – the average is much lower

1.2.20 A figure of 4,800 workers is used within the Shadow HRA as the worst case scenario.

1.2.21 The estimation of numbers of construction workers recreating at European sites was precautionary because it was based on the largest potential numbers of workers at peak of construction (i.e. when construction workers, and consequently numbers potentially visiting European Sites, are likely to be at their highest) to inform the HRA evidence base as a 'worst-case' scenario.

1.2.22 As described at **paragraph 3.3.5** of the **Recreational Disturbance Evidence Base (Shadow HRA Report Volume 1 Appendix E Annex A [[APP-148](#)]**, this represents the peak number of construction workers likely to be on site for a very short period within the overall construction timeline.

1.2.23 On average, the NHB workforce is 44% of the peak, as set out in the **Workforce Profile Technical Note, Appendix 9A to Volume 2, Chapter 9** of the ES [[APP-196](#)].

v. Other reasons that the 10% is precautionary / conservative

1.2.24 Demographic characteristics are important - As described at the second bullet point in **paragraph 3.3.10** of the **Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [[APP-](#)**

[148](#)) the workforce will be dominated by men aged 20-50, based on the national breakdown of people employed in the construction industry, and the key sport/recreation characteristics for this demographic group are:

- Preference and higher than national average participation in organised/formal sport - main reason is to meet friends;
- football and gym are overwhelmingly favoured as activities. The provision of formal recreation facilities for construction workers comprising a gym at the accommodation campus and sports facilities including a full-size 3G football pitch and two MUGAs at Alde Valley School adjacent to Leiston Leisure Centre is described in **paragraphs 3.4.177 to 3.4.179 and 3.4.221 to 3.4.223 of Volume 2 Chapter 3 (Description of Construction)** of the **ES** [[APP-184](#)];
- work commitments are a significant reason for not undertaking recreation activity;
- Other than sport, these groups are less likely to take part in recreation and leisure activities outside of the home.
- The ONS '[Leisure Time in the UK](#)' survey (ONS, 2015) notes that 'the majority of leisure time for both men and women was spent consuming mass media, for example, watching TV, gaming, reading or listening to music (16 hours and 24 minutes per week for men). For men, these 'at home' activities account for nearly 40% of all available leisure time.
- The ONS '[Leisure Time in the UK](#)' survey (ONS, 2015) notes that people who work in skilled trade professions spent the least time on leisure (four hours and 34 minutes per day), compared with people in sales and customer services professions who spent the most (five hours and 21 minutes per day).
- The ONS '[Leisure Time in the UK](#)' survey (ONS, 2015) notes that on average, those employed full-time spent the least amount of time performing leisure activities (four hours and 48 minutes per day).

**1.2.25** Workers will be working shifts which limit the availability of time for recreation. The majority of construction workers will work in shifts, limiting the time when all workers may be looking to undertake recreation activity (first bullet point in paragraph 3.3.10 of the **Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A** [[APP-148](#)]).

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- A proportion of shifts will be during the day with 'time off' during the hours of darkness when recreational resources at European sites are likely to be less attractive to construction workers because they are remote and unlit.
- The ONS '[Leisure Time in the UK](#)' survey (ONS, 2015) notes that 36% of recreation is done during weekends (when NHB workers are most likely to be back at their permanent address).

1.2.26 Location and NHB characteristics are important - at peak approximately 3,000 of the 5,000 NHB construction workers would be based in the accommodation campus at the entrance to the construction site, and at the area designated for caravans in the LEEIE. They would be living alone because families would not be allowed to stay at the campus or at the LEEIE (first bullet point in paragraph 3.3.8 of the **Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])**) describes this for campus-based workers; families would also not be allowed to stay at the LEEIE caravan site).

1.2.27 At peak approximately 2,000 of the 5,000 NHB construction workers are expected to stay in private rented sector (PRS) or tourist accommodation in the area, up to around 60-minutes drive-time from Sizewell C (third bullet point in paragraph 3.3.8 of the **Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])**). They will be spread over a wide area, and therefore, if they do undertake informal outdoor recreation, they are likely to do so at locations spread over a wide area including many locations 'close to home' that are not European sites, thus diffusing effects.

1.2.28 Net additionality needs to be considered:

- A large proportion of the PRS and tourist accommodation assumed to be occupied by Sizewell C construction workers will already exist and has the potential to already accommodate residents or tourists (the fact that there are many tens of thousands more tourists staying in the area at some points of the year compared to others suggests that there is capacity for additional temporary demand).
- The sHRA assumed that all of the 2,000 workers staying in PRS or tourist accommodation would be additional to the area, whereas in fact some would replace existing people.
- In addition, existing residents in PRS accommodation and holiday makers in tourist accommodation are more likely to recreate at

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European sites than the construction workers who replace them, for reasons described above.

1.2.29 It is also the case that the majority of the 5,000 'additional' NHB construction workers at peak would not have dogs. As described in paragraphs 3.3.18 to 3.3.20 of the **Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])**, and would therefore not undertake regular (e.g. daily) dog walks.

- The 3,000 (at peak) workers at the accommodation campus **paragraph 3.3.18 of the Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])** and LEEIE would not be allowed dogs at their accommodation, therefore, dogs would not be a potential source of harm from this source, and these workers would not be undertaking regular (e.g. daily) dog walks.
- 10% of the approximate 2,000 (at peak) construction workers in PRS and tourist accommodation are assumed to have dogs with them for the purpose of the numbers estimated in **Table 3.9 of the Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])**. This is considered to be a precautionary approach and the actual percentage is likely to be less because (see **paragraph 3.3.19 of the Recreational Disturbance Evidence Base (Shadow HRA Volume 1 Appendix E Annex A [APP-148])**):
  - Limited availability of accommodation that allows dogs.
  - Given the (long) length of shifts and temporary basis of employment tenure, the majority of workers who have access to a dog (i.e. there is one in their main permanent residence away from Sizewell C) are unlikely to bring them to their temporary Sizewell C accommodation. If their permanent home accommodation is shared with, for example, other family members, many are likely to leave the dog at home where it could have better care and be less disrupted by shift working patterns.
  - Workers may not wish to leave dogs unattended at their PRS or tourist accommodation for long periods while they are at work, and the ability to do so may depend on their ability to locate and employ a dog walker. Thus the availability of dog walkers that workers could employ may also be a further limiting factor.



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- Existing residents in PRS and tourist accommodation who construction workers are replacing, as described above, are more likely to have dogs than the construction workers. Existing dog owners in PRS accommodation will be at their main home and therefore have their dogs with them in their PRS accommodation. Many existing tourists who own dogs are likely to have them with them on holiday. Construction workers in PRS and tourist accommodation are less likely to have dogs for reasons described above. The potential for reduction in numbers of dogs, and regular daily dog walks, has not been discounted from the precautionary figures used in the SHRA.

1.2.30 The numbers of construction workers (with and without dogs) visiting European sites presented in columns 'f' of Appendix A of the Statement on Recreational Disturbance Numbers [[REP7-087](#)] is therefore considered to be precautionary and actual numbers during the construction phase are likely to be lower.