

FREEPOST

SZC Consultation

FAO Mr Jim Crawford,  
Sizewell C Project Development Director

Dear Mr Crawford,

### **Response to Sizewell C Stage 2 Public Consultation**

Thank you for the opportunity to respond on behalf of Waveney District Council to the Stage 2 public consultation in relation to the proposed new nuclear development at Sizewell C, within the District of Suffolk Coastal, with whom we work in partnership and therefore share a number of their concerns and opinions with regard to the development. Subject to a vote to be taken in 2017, the aspiration is for Waveney District Council and Suffolk Coastal District Council to become one East Suffolk Council, so we appreciate the opportunity to comment at this stage and you will note that in most areas we are speaking as one with Suffolk Coastal District Council.

- Waveney District Council recognises that Sizewell C has the potential to deliver significant local economic benefits and employment opportunities in Suffolk for many years to come and we welcome EDF Energy's aspirations in this respect. We are determined to ensure that Suffolk residents benefit from its construction and its operational life.
- The Stage 2 documentation confirms EDF Energy's positive aspirations, but does not yet give sufficient detail of the mechanisms how these aspirations can be achieved.
- We welcome EDF Energy's aims, objectives and aspirations around socio-economics, aspiring to limit any significant adverse economic and social impacts, while creating significant business, training and job opportunities for local and regional communities during construction and operational stage. We acknowledge that we are only mid-way through the pre-application process, with much detail still to come forward.
- While EDF Energy has undertaken further work with the local authorities and other bodies to set-up a structure within which the effects of the Project on socio-economics is

discussed, analysed and eventually assessed and managed, there is a need following the Stage 2 consultation to agree on firm outputs and commitment to action despite the unknown timescales, Waveney District Council working with Suffolk Coastal District Council in partnership would wish to be a part of the next steps.

- The consultation document states that the next steps include:
  - a community impact report, drawing on evidence from topic areas including noise, air quality, visual and transport, to identify the specific combined environmental effects on residential amenity in local areas;
  - a Health Impact Assessment;
  - a Public Services Strategy, including an Emergency Services Plan, Community Safety Management Plan and Worker Code of Conduct; and
  - preparation of an economic strategy, including the approach to quantifying economic impacts, the supply chain and procurement, a skills, education and employment strategy, and a construction workforce development strategy.

These will be important documents which we would anticipate provide more clarity on how EDF Energy's aspirations can be achieved. We would expect that our comments below will be considered and reflected in these reports and strategies, and would welcome further involvement in the development of these.

### **Transport Strategy**

At this stage we are not aware of the modal split for the development and this is of extreme importance in determining the potential impacts of the development on Waveney District Council. Once we are aware of the modal split between sea, rail and road, we will be in a position to comment more appropriately of the suggested and required mitigation.

Understanding the proportion of movements via road (detailed but not evidenced in the documentation as no more than 40% gross weight) will enable and potential influence transport planning in Waveney.

Of equal importance is the understanding of what proportion may come via sea to the site as this will have a potential impact on coastal processes in WDC as well as SCDC. It is critical that we understand the modal split as early as possible.

### **Economic Strategy**

EDF Energy say that to develop an economic strategy that optimises the benefits of the Project, particularly for supply chain and skills, EDF Energy will continue to work closely with the local authorities, the Suffolk Chamber of Commerce, New Anglia Local Enterprise Partnership (NALEP), education and skills providers and private partners. However, there are not many specific proposals.

To develop the strategy, the following should be considered:

- We agree that it is important to update the baseline information (as suggested in 5.1.16 of the consultation document) as currently there seems to be a heavy reliance on the 2011 census data which of course is already rather dated and is likely to be 10+ years old by the time construction actually starts.

- We would like clarification of EDF Energy’s use of the definition “local”, which we believe to mean Suffolk.
- Economic impact metrics – independent validation will be required.
- We would like to see the project used as an opportunity to improve digital connectivity.

The Economic Strategy needs to be resourced properly, owned and monitored. We urge EDF Energy to engage with the Growth Hub and consider creating a dedicated, embedded Sizewell C specialist. This could enable start-up business generation as well as assist existing businesses to grow and take the opportunities that will arise.

To ensure maximum advantage of the development to the Suffolk economy, the Councils will also continue to work closely with the Energy Coast Delivery Board, Government, China General Nuclear, the Suffolk Chamber of Commerce and other partners in conjunction with EDF Energy to ensure that the right framework is created in order to lever the maximum economic benefit for Suffolk.

### **Supply chain**

In order to maximise the opportunities for local businesses to win a significant share of the contracts for Sizewell and other nuclear projects, and for the local economy to thrive as a result of the development, we wish to make the following comments:

- EDF Energy should focus on growing our local companies as well as encouraging relocation of established Tier 1 contractors into Suffolk, albeit potentially temporarily, as well as assisting Tier 2 and 3 to be ready to participate. To position for this we urge a serious offer to help Suffolk companies get involved in HPC.
- A local procurement presence or supply chain adviser would be essential to maximise supply chain opportunities in Suffolk.
- EDF Energy is suggested to explore opportunities to link in with other developers and providers in the energy sector, such as offshore wind, to consider for example shared apprenticeships. It may be beneficial for EDF Energy to work with East of England Energy Group (EEEGR) to link with the whole energy sector in the region.
- Increasing productivity and encouraging innovation are key national and regional aims, just as they are local priorities. A project of this magnitude should be a key driver. We encourage EDF Energy to engage with NALEP and bodies such as Tech East, with the aim of making Sizewell C a catalyst and exemplar project.

### **Skills and employment**

Local partners share the high level ambition to create “an environment in which education, skills and workforce development can flourish” but cannot support these proposals until there is greater clarity about how these opportunities will be maximised for the benefit of local people and businesses.

EDF Energy sets out its understanding of the characteristics of the economy and labour markets within Suffolk as a basis for predicting potential skills and employment responses and effects of the project on these markets (5.3.1 – 5.3.14). While most of this evidence does provide useful context, local partners have some concern regarding the validity of certain aspects of the evidence / assumptions made. In particular:

- When calculating the potential available construction workforce EDF Energy have used the 2011 Census which was conducted at the height of the last economic downturn and is therefore of limited value in terms of the current available workforce. This data needs to be revisited to gain a current understanding of labour pressures in the construction industry and wider related sectors.
- Data sets used to measure economic inactivity, unemployment and worklessness also provide an incomplete picture. In particular there is an over reliance on Jobseekers Allowance Data, rather than an assessment of the whole cohort currently claiming work related benefits. Job Centre Plus data indicates that Jobseekers Allowance (JSA) claimants equate to only one fifth of those unemployed within Suffolk.
- The demographic data which has also been used to predict potential responses assumes that the workforce will be solely UK based as it also is taken from the UK Census results.
- We note the 500 staff working at the offsite associated developments, which are, in addition to the peak construction workforce of 5,600 working on the Sizewell C development itself (para 5.1.11). It is unclear whether and where these additional 500 staff has been included in the impact assessments. We request clarity about how the Gravity model and other work have been or will be adjusted by this new addition.

We request clarity on how EDF Energy will secure a better understanding of the existing labour market and its ability to respond to the project/potential labour market pressures and tensions resulting.

We welcome EDF Energy's statement in support of the Councils aspiration to maximise opportunities for local people to secure high-skilled and well paid roles within the project (para 5.3.8). However, this stated commitment is not reflected in EDF Energy's current level of ambition for homebased workers as demonstrated in the current low targets. Homebased workers, currently proposed at 36%, while a small increase compared to Stage 1, is still set at a level that lacks ambition. This lack of commitment by EDF Energy to local upskilling is reinforced when considering the projected proportion of home-based workers in higher skilled jobs.

This is unacceptably low and we ask EDF Energy to demonstrate a level of ambition that matches our own commitment in Suffolk to upskilling our local population. For example, the higher technical occupations of mechanical and engineering (M&E) Operatives (30%) and management functions (15%) compared to 90% homebased for the low level occupations of site services, security and clerical occupations (Table 5.4). EDF Energy state the number of anticipated home based workers is calculated on the current availability of skill sets (5.4.6), this calculation does not take into account the skills response that could be achieved within Suffolk if key interventions are made sufficiently early, as set out by EDF Energy elsewhere in this section (5.6.27). We would urge more ambition is securing employment benefits through upskilling local residents and would expect an increase in the overall proportion to between 40% and 50%, with a particular focus on increasing the proportion in higher skilled jobs through an early skills intervention.

The number of job roles (25,000) and the construction labour demand curve (figure 5.5) are well known, but if we are to achieve maximum beneficial impact from this project local partners need more detail about the different roles within the categories shown. Our expectation is that

EDF Energy already has a detailed breakdown of the different occupational roles that will be needed in order to reach these aggregated forecasts and we urge this data to be shared at the earliest opportunity.

There is no mention of impacts from other large infrastructure projects national (such as High Speed 2 and other new nuclear) or local and how the combined effects will affect workforce availability; salary levels and displacement employment issues for established local businesses. Forecasts for the impact of known other national and regional projects need to be considered when assessing the workforce needs and strategy for mitigation and skills development. A further factor which should also be assessed is the potential effect of Brexit on availability of migrant labour in the local economy and the direct and indirect impact of this on the labour market.

In addition to the above feedback on the overall skills and employment section, we would like to offer the following comments that relate to specific aspects of our local skills strategy within the consultation documentation.

### **Work Inspiration**

We welcome the approach that EDF Energy sets out within its 'Approach to education' (5.6.11 – 5.6.18), key to this being that the work is not all upstream to opportunities that will be available within EDF Energy but to opportunities in the wider industry.

We will expect EDF Energy to invest in a comprehensive programme of activity that complements existing interventions at primary, secondary and post-16 phases, to inspire and enable more young people to achieve in Science, Technology, Engineering, Mathematics and Construction (STEMC) subjects. The focus would be on developing programmes that promote and reward excellence in teaching and learning in STEMC subjects, raise awareness of STEMC careers and enable experiences relevant to these occupations, starting at primary school age.

### **Apprenticeships**

We will expect EDF Energy's Apprenticeship strategy (5.5.25) to set ambitious and stretching targets for Apprenticeship recruitment across all levels during the construction and operational stages of the project. The consultation document does not provide details of any mechanisms that will be used to deliver this aspiration.

Alongside the expectation of stretching Apprenticeship targets for EDF Energy and its supply chain partners, we will expect EDF Energy to support the fostering of Apprenticeships in small and medium sized enterprises to help mitigate the effects of workforce displacement.

## Education and Training

It is very positive that EDF Energy recognises that a strategy that integrates and seeks to add value (5.6.20) to existing policies and strategies will leverage maximum impact across Suffolk and the ambition to provide opportunity for all people within the community to participate in the workforce through targeted initiatives (5.5.25) has the potential to deliver employment benefits.

We urge EDF Energy to follow up with more details and discussions on how we can work together to achieve this. For example, our young people have difficulty accessing training if is not located in convenient locations for public transport and even then, travel can be too expensive. All employment opportunities throughout the project should be made accessible to all Suffolk residents, helping to narrow inequalities (e.g. rurality), tackle worklessness and deprivation alongside the target groups that EDF Energy outline within the consultation document (5.5.25). We would also like to see EDF Energy explore the use of Social Value as a measure of quantifying any interventions success.

## Infrastructure

We recognise EDF Energy's aspiration to support the creation of a long term skills legacy as demonstrated in the consultation document (5.6.21).

## Adverse economic impact

The potential negative economic impacts from a development of this scale must be recognised by EDF Energy and appropriate minimisation/ mitigation of these impacts must be implemented. EDF Energy needs to further work on the following:

- More robust modelling on the impact of skills displacement. This should include impacts on key sectors such as other energy, particularly offshore wind given Lowestoft's important role for operations and maintenance, tourism and other service industries, as well as on 'key workers' such as on call firefighters, the police workforce or carers. For example, the accommodation campus may divert servicing staff from elsewhere (whether from tourism provision or care homes for example). Mitigation proposals need to be developed.
- The Stage 2 documentation focusses on impacts on the tourism and agriculture sector, however while these are important sectors, they are not the only ones in the locality; the impact on other sectors needs to be more thoroughly explored.
- The effect on tourism (from 5.5.13) is not being adequately addressed. The whole Visitor Economy will be negatively affected and EDF Energy needs to consider the effects on a much wider basis. This includes impacts on tourism accommodation supply and availability of servicing staff. Sizewell C will have a massive impact on the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), a **national** designation and the idea of a 'building site for 10 years' will hugely impact on potential visitor perceptions of the area. While the proposed visitor centre is welcome as a new visitor attraction, this

cannot mitigate for the overall negative impact on the countryside which is the main tourism draw. We would like to understand what definition criteria have been used – for example, are bar and restaurant employment included as these businesses tend to depend significantly on visitors but aren't seen as classic tourism sector businesses.

- We welcome EDF Energy's plan to commission a visitor survey and would like to be involved in scoping and designing this. The survey should be agreed in advance with the interested parties: the Local Authorities, the AONB, and Royal Society for Protection of Birds (RSPB) and the Destination Management Organisation (DMO). We feel very strongly that there is a case for significant mitigation funding to alleviate the negative impacts of the build and operation lifecycle, as well as promotion of the area to counteract the perceptions of Suffolk as a building site.
- It will be very interesting to see the results of the visitor survey as the visitor economy is a vital component to East Suffolk. One way to increase this economy is to improve the roads South of Lowestoft and a two village's bypass will go a long way in achieving this but a 4 village bypass even more so. The minimum mitigation in relation to the Sizewell C development should be provision of a 2 village bypass, and we welcome the suggestion from SCC as Highway Authority that this could form a contribution towards provision of the much needed and to be welcomed 4 village bypass. This would ease congestion in the locality and reduce the construction and operational impact of the development on local residents in this area. Mitigation of this important route to Lowestoft from the south is a priority for Waveney District Council.

### **Community impact**

Housing – impact on the housing market, where workers will be likely to live, and the potential displacement of existing renters in the private rented sector. There are additional concerns with regard to the potential Impact on tourism accommodation in the vicinity.

In addition, there is very little detail in the consultation document on impacts to other services within Suffolk, such as emergency services, emergency planning. Healthcare provision – doctor's surgeries, hospitals etc. and limited input as to what impact there may be on school place provision – some of these issues may be more localised to Suffolk Coastal District but Waveney District would like reassurance that these matters are being considered in full. It is noted that there is anticipated to be a workforce from Lowestoft necessitating a regular bus service from Lowestoft to the Sizewell C site. Is there any potential for such a service to be opened up to other potential users in the area, potentially with a drop off at Darsham Station as an example?

### **Environmental impacts**

Waveney District Council is not currently proposed for any associated development. However, is there potential that Lowestoft Port could in some way be used? Particularly if either of the jetty options become untenable after further consultation. However, any use of Lowestoft Port must be aligned with the existing wind farm usage of land around the port and the potential for there to be insufficient land / capacity for Sizewell C development. Further work to assess this would be appreciated. Where possible, Waveney District Council would welcome the opportunity to facilitate and work with EDF Energy to promote their available sites for future use by contractors working on the Sizewell C project.

I trust that you will consider the above in the next stages of developing the project and I would re-iterate my desire for Waveney District Council to be involved in future discussions of the proposal particularly having regard to skills strategy development, coastal processes and modal split to inform transport planning.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'DWGR', with a long, sweeping horizontal line extending to the right.

Councillor David Ritchie,  
Cabinet Member for Planning & Coastal  
Management  
Waveney District Council

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Councillor Michael Ladd  
Cabinet Member for Tourism, Economic  
Development and Rural Affairs  
Waveney District Council