

FREEPOST  
SZC Consultation

FAO Mr Jim Crawford  
Sizewell C Project Development Director

Dear Mr Crawford,

### **Waveney District Council response to Sizewell C Stage 3 Public Consultation**

Thank you for the opportunity to respond on behalf of Waveney District Council to the Stage 3 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.

On the 1 April 2019 the new East Suffolk Council will be formed replacing Waveney District Council and Suffolk Coastal District Council, you will note that in anticipation of this that in this response we generally speak as one with Suffolk Coastal District Council.

As at Stage 2 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 and support 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 3 documentation confirms EDF Energy's positive aspirations, but does not yet give sufficient detail of the mechanisms how these aspirations can be achieved.

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, are admirable. However, we would have liked to have seen more detail at this final stage of consultation before Development Consent Order submission, and are disappointed not to have more detail on mitigation proposals for the development including firm outputs and commitment to action.

Alongside Suffolk Coastal District Council, we are disappointed that the consultation documentation for Stage 3 remains insufficiently comprehensive and not sufficiently evidenced in several important areas for us to be able to fully consider the impacts. We remain unable to

fully evaluate how adequate the proposed mitigation proposals will be. Post Stage 3 we will work as one East Suffolk Authority to ensure that the Sizewell C proposal becomes a proposal that can work in and for Suffolk.

It is not proposed to repeat the policy context for the proposal here, suffice to say that we are cognisant of the Planning Act 2008 and the subsequent National Policy Statements EN-1 and EN-6 that provide the policy framework for major Energy developments in particular new nuclear proposals.

The East Suffolk Business Plan (2015 – 2023) identifies the new nuclear power stations at Sizewell C as a huge opportunity to grow the East Suffolk economy. It states that the East Suffolk Councils will continue to work closely with EDF Energy and a wide range of partners to maximise the economic benefits of this development, whilst minimising and managing any negative impact.

A Sizewell C Nuclear Power Station would bring significant financial opportunities to Suffolk. According to EDF Energy's figures, the development is expected to generate at least £100m pa investment in the regional economy during construction and £40m pa during its 60 years of operation. It would strengthen the Suffolk economy and employment market, and a package of mitigation and compensation would have a lasting legacy.

The development could provide significant additional business rate income to the local councils; however, Government has not yet provided clarity on the proportion of business rate that can be retained in Suffolk. Current proposals for business rate retention are for 75% to be retained but this may be increased in later years. It should be noted that business retention proposals relate to growth in business rates across Suffolk, which means that not all of the business rates from Sizewell C would automatically be retained in Suffolk. It is recommended that alongside Suffolk Coastal District Council and Suffolk County Council that we will lobby Government to seek the maximum amount of business rate retention, as compensation for the local community.

The development of a Sizewell C Nuclear Power Station would have an impact on residents throughout Suffolk and beyond, in terms of the economic and employment benefits. The tourism industry along the East Suffolk coast will be particularly affected by the development.

Residents in the vicinity of the development site, particularly those in Eastbridge, Theberton and Leiston will be most affected by the negative impacts of the development. Transport impacts will particularly affect residents and road users of the A12 between Seven Hills junction and Lowestoft, and the B1122. However, transport impacts will affect wider areas, including along the B1078, the A1120, the A145 and a number of rural roads, as well as the wider strategic road network. Additionally, there will be an impact on local residents near the proposed Park & Ride sites, which are proposed at Wickham Market and Darsham. In the rail-led option, proposals also include closures and upgrades of rail level crossings on the East Suffolk Line between Westerfield and Saxmundham. Either rail or road-led option may have potential impacts on users of the East Suffolk Line, and the additional capacity pressure on rail could potentially have an impact on the rail operations of the Port of Felixstowe.

The strategic objectives can be aligned to those of Suffolk Coastal District Council and Suffolk County Councils (as published in their Cabinet reports of the 11 and 12 March respectively):

- a) To provide a lasting legacy for the local communities and the economy;
- b) To appropriately mitigate and/or compensate for local impacts;
- c) To secure skills and education benefits for the wider area;
- d) To support economic growth of the region and East Suffolk in particular;
- e) To act as an environmental exemplar within the protected landscape, Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB);
- f) To secure an infrastructure legacy;
- g) To provide for funding of long-term community benefit; and
- h) To have an appropriate decommissioning and removal of nuclear waste strategy.

It is acknowledged that some of these objectives will need to be achieved in a partnership approach working with EDF Energy and other relevant partners such as Natural England, the Environment Agency and other partners.

### **Economic Strategy**

We recognise that, in order to maximise the advantage of the development to the Suffolk and regional economy, as part of East Suffolk Council we will need to continue to work closely with Therese Coffey MP's Suffolk Energy Coast Delivery Board, Government, the Local Economic Partnership (New Anglia LEP), the recently established LEP wide All Energy Industry Council, 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 repeat the following comments from our Stage 2 response:

- 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 Hinkley Point C.
- 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 New Anglia LEP and bodies such as Tech East, with the aim of making Sizewell C a catalyst and exemplar project.

## Skills and Employment

At Stage 3, EDF Energy continue to estimate that the peak workforce will be 5,600 workers on the main development site plus a further 500 workers working on the Associated Development sites. These will need to be accommodated in the local area and there is potential for this to include living in Waveney and travelling to the site. Whilst we welcome the very significant benefits this would bring to local employment markets, supply chain and skills development, the impact of this number of workers on housing market, transport network and community facilities would be considerable.

EDF Energy has also introduced sensitivity testing of the peak workforce numbers, considering what the effects might be if the peak workforce increased to 7,900 workers on the main development site plus 600 on Associated Development sites. We support EDF Energy in considering the impacts of a “worst case scenario” of increased workforce numbers. However, we need to be convinced that appropriate mitigation can be put in place for such a potential increase. The Stage 3 proposals need elaboration, as it is not clear how the local housing market could accommodate such an increase with the limited additional mitigation proposed this needs to be expanded and discussed further. Neither is it clear how such a potential increase was incorporated in EDF Energy’s Gravity Model and Traffic Modelling. This could have impacts on Waveney so this needs to be fully considered.

We continue to welcome EDF Energy’s aims, objectives and intentions 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.

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 order to deliver on the socio-economic opportunities we expect EDF Energy to invest in skills, employment and business interventions that, among other outcomes, raise aspiration and achievement levels for young people (especially in STEMC – Science, Technology, Engineering,

Mathematics and Construction - subject areas), provide opportunities for those not in employment, enhance the local skills training offer and increase skills levels that provide a legacy workforce aligned to forecast future need and provide facilities for business expansion and inward investment. We expect to see commitment to offer local companies opportunities to benefit from the development and the ongoing operation of the site. As part of East Suffolk Council, we expect to be fully engaged, alongside Suffolk Chamber of Commerce, in the development of the supply chain engagement strategy. As highlighted in our Stage 2 response we support the following:

- **Work Inspiration:** we 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 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 age;
- **Apprenticeships:** we will expect EDF Energy's apprenticeship strategy 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 aspiration 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 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 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 it 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 have outlined previously. We would also like to see EDF Energy explore the use of Social Value as a measure of quantifying any interventions success.
- **Infrastructure:** we support EDF Energy's aspiration to create a long term skills legacy.

### **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, construction, 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 effect on tourism is not considered to be 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 welcomed EDF Energy's previous plan to commission a visitor survey and through our joint work with Suffolk Coastal District Council have been involved in scoping and designing this. 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.
- The Stage 3 documents refer to working with stakeholders to identify the extent to which the construction project impacts on the attractiveness of the area to tourists. It mentions plans for a visitor survey to assess the extent of this and other tourism related issues. The tourism survey developed by EDF Energy has been detailed to us and we have expressed reservations about the robustness of the qualitative phase of work (already completed) and the narrowness of the brief given to very small focus groups. We are waiting for further details on the quantitative survey element, into which we have fed comments previously; we understand that this is likely to be conducted via online methodology and not face to face surveys.
- 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, we welcome proposals for minimum mitigation a 2 village bypass. We continue to support Suffolk County Council in their aspirations for 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 impacts**

The Stage 3 consultation indicates generally appropriate aspirations, but there is still not enough detail on delivery mechanisms to determine whether the aspirations are achievable or ambitious enough to capitalise on the opportunity to deliver a lasting positive legacy for our residents.

We urge EDF Energy to be even more ambitious in increasing the percentage of locally-based residents taking up roles, particularly for the highly skilled jobs. We request further work on the expected adverse economic impacts on other sectors, such as tourism.

There will be a need for EDF Energy to mitigate and compensate for the community impacts of their development proposals. We welcome that EDF Energy's Stage 3 proposals include an indication that they would look to set up a Housing Fund, Tourism Fund and Community Fund to mitigate and compensate for some of the impacts of the development. We equally welcome that EDF Energy recognises the wide range of impacts their development may have on services for the local community, including on the health system, social care and education.

Further detail is required to determine and mitigate the impact of the proposal on public services, to ensure that working with partners we can effectively deliver services to this increased population alongside Suffolk's current residents. This includes impacts on community facilities (such as schools, General Practitioner surgeries, dentists, and hospitals), blue light / emergency services, social care and local community facilities.

As part of EDF Energy's accommodation strategy we expect more detail to ensure robust measures are set up to mitigate any impacts on the wider housing market and local services and facilities associated with the demands of EDF Energy workers, including for the potential of an increased workforce of 7,900 + 600. We will look to explore opportunities for the Council to work with EDF Energy around these impacts.

The Government has committed to deliver a community benefit package to communities that will host new nuclear power stations, recognising the scale and duration of the impact of new nuclear power stations and the role that communities will play in hosting nationally significant infrastructure. As part of East Suffolk Council we will work with local MPs and the New Nuclear Local Authority Group to ensure that a community benefit package is delivered alongside a full package of mitigation secured through the planning process. Detailed discussion with the Government is required in relation to the arrangements for delivering community benefit alongside proposals for the retention of business rates arising from Sizewell C in Suffolk.

Government confirmed in 2013, when announcing that a community benefit scheme would be delivered for host communities, that there would be an annual sum paid over a 40 year period, based on electricity generated by a plant, to be provided to the local communities. This would be managed locally and used to bring a long-term economic and social legacy. The Government has been silent on this for some time, but a Government official has confirmed that it remains Government policy.

Recently the Ministry of Housing, Communities and Local Government has informed the New Nuclear Local Authorities Group that a consultation related to Business Rates retention would consider this issue. To date this has not happened, and officers are continuing to press for action. It should be noted that there is precedent for this type of fund from the offshore wind developments and in the emerging fracking areas, albeit these could be different mechanisms than that required in this case. This is a matter that will be taken forward by East Suffolk Council.

### **Main development site - environmental impacts**

The nominated site lies on the Suffolk Heritage Coast, wholly within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) national designation, and the lay-down area during construction phase will cross the entire width of the AONB. As a result, mitigation and compensation is very challenging, and EDF Energy needs to pay great attention to the detail. Given this high environmental sensitivity, Sizewell C should be an environmental exemplar in the way that it is executed. The mitigation hierarchy must be followed and residual environment impacts compensated for through a Section 106

agreement. The fund established to compensate for the impact of the Dry Fuel Store on the Sizewell B site is a welcome precedent and model which we would like to explore further with EDF Energy, but it has its challenges, so it is not suggested that it is exactly replicated.

The scale of the construction operation must not be underestimated; public enjoyment of this unique environmental resource will be hugely reduced for a significant period and, potentially, irreparably damaged. Once visitor patterns are disrupted and East Suffolk's brand and reputation are damaged, this can take some time to re-establish, which could have a significant effect on the tourism sector. EDF Energy will be reminded that much of the development they propose is in the AONB and thus should be delivered as an environmental exemplar. This means significant mitigation will be required to minimise the impacts of the development and where the impacts cannot be mitigated compensatory arrangements will be needed. Furthermore, the legacy of this development should be to create an environmental and amenity resource to complement the existing features of national renown in the area.

It appears that there has been no significant ecological fieldwork undertaken since Stage 2. This is of significant concern, not least as some of the survey data may be out of date.

Stage 3 introduces several changes to the main development site. Many of these are detrimental rather than beneficial in comparison to the Stage 2 proposals. Changes include the introduction of tall pylons on the main development site, some improvements to the design of non-nuclear buildings on site, further permanent development within the AONB at Goose Hill to the north of the site and Pill Box Field to the south of Sizewell B, and further details regarding the SSSI crossing, spoil management, beach landing facility and sea defences.

Stage 3 does not include any detail about hydrology, treatment of surface water, impacts on ground water or on potable water supplies. Alongside Suffolk Coastal District Council we are concerned that elements of the development may have significant potential impact on ground water levels. Equally, there are doubts over whether the proposed designs allow for incorporating Sustainable Urban Drainage Solutions (SUDS). Questions on the availability of potable water supplies have been raised in previous consultation responses but remain unanswered; however, we understand that the local water company, Essex and Suffolk Water, does not believe there to be an issue.

We share concerns with Suffolk Coastal District Council regarding the impact of the proposed development on coastal processes and the marine environment. In particular, we are concerned that the proposed footprint of Sizewell C is much further seaward than Sizewell B, which may have a significant impact on coastal processes and coastlines. This is a concern raised by Suffolk Coastal District Council at Stage 2, and yet no alternatives to this footprint have been provided. We recognise that pushing the footprint further inland would lead to further loss of the SSSI which would be significant and likely to be unacceptable; however, we have not been presented with a full assessment of this alternative to consider. However, given the potentially severe impact on our coastlines and/or on the SSSI, we may find that neither of these options is acceptable. We urge EDF Energy to consider further whether the layout of the site could be condensed to reduce the land take, and thus avoiding the footprint of Sizewell C being either

further seaward or taking up further SSSI land. It maybe it is possible that the sea defences could be put nearer the station and this may be a solution but further work on this issue is needed.

We expect, as part of East Suffolk Council, to establish with EDF Energy a robust process for ongoing monitoring of coastal change and Sizewell C's impacts. There should also be an obligation on EDF Energy to provide mitigation if actual change departs from anticipated baseline change. This will need to be backed by a strong legal document.

EDF Energy's interest is limited to the site, the construction and the operating period. However, the District Council as coastal protection authority must take into account both 'unintended consequences' of construction and it becoming a 'permanent' feature and its anticipated increasing impact on coastal processes exacerbated by climate change on the coastline and local communities.

### **Accommodation strategy**

The potential impact of an additional workforce on the local housing market is a key area of concern for Suffolk Coastal and Waveney District Councils, the information provided by EDF Energy demonstrates that there would be a significant uplift in workers seeking accommodation in the tourism sector and in the private rented sector; the locality does not have this level of availability. There is a real concern that this could be detrimental to the more vulnerable members of society currently in the private rented sector. An increased Housing Fund may not be enough to address the additional demand. EDF Energy is expected to work closely with East Suffolk Council to ensure that the housing market is as robust as possible for an increased number of workers to be considered sustainable.

### **Accommodation Campus**

As Waveney District Council we have no specific comments with regards to the accommodation campus proposed to house 2400 workers at the entrance of the construction site, other than to comment that this is a logical location for the workers that removes unnecessary pressure on the local housing and tourist accommodation markets.

### **Transport Strategy**

At Stage 2 we asked for clarification on the modal split for the development: sea, rail and road. It is now understood that sea is no longer being considered and that a rail or road –led strategy will be proposed. We sought no preference at Stage 3 although highlighted potential concerns with coastal processes from a sea-led proposal. However, we do not have adequate information available other than an unjustified split of 85% HGV movements from the south and 15% movements from the north. Further clarity on this is required to establish the potential impact on road networks within Waveney District. 15% of HGV traffic during peak years could be a significant number of vehicle movements. We would expect there to be consideration and assessment of the impacts of this traffic passing through Waveney District in particular through Lowestoft, Beccles, Bungay, Halesworth and routes to the site. There are allocations within the Waveney District Council Local Plan (available online at [www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)) that will need to be considered; this Plan is due to be adopted on March 20 2019, as this will increase the number of houses and economic growth potential across Waveney. However, with regards the specific detail we defer to Suffolk Coastal District Council and Suffolk County Council in this regard.

**and finally...**

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 now that both of the previously proposed jetty options have become untenable to EDF Energy, we would welcome further discussions around this and the potential to link the port to the rail in the town to increase capacity and take HGVs off the road. 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.

We trust that you will consider the above in the next stages of developing the project and we welcome the opportunity for Waveney District Council as part of East Suffolk 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,



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