

STOP SIZEWELL C
contributions to Issue Specific Hearings from Alison Downes and Steve Lucas

ISH1 - Draft DCO.

Summary of oral submissions

We consider the term “reasonable endeavour” to be inadequate and believe it is appropriate for the local authorities, as our elected representatives, to have more influence if the project is not going according to plan.

We found Mr Rhodes’ comments *“of course, it would be nice if all the mitigation was in place before anything else happened. But first of all, is it practical and is it necessary...”* ([EV-080](#) Session 3 @ 1:00.51) shocking, and these completely undermine what we understand as the concept of mitigation; something we evidently share with Suffolk County Council.

Urgency: The Applicant referred to urgency at great length repeatedly throughout the Issue Specific Hearings. We pointed out that at Hinkley Point, the first community consultation started in November 2009 and the DCO application was submitted in October 2011. At Sizewell, the first community consultation began in November 2012 and the DCO was submitted in May 2020. Whilst we would be the first to agree that the Sizewell site presents many significant challenges, clearly there is a significant difference in those two timeframes and we do not believe that we should be made victim to the Applicant’s failure to plan effectively. The slowness of the EPR build (and its tendency to overrun) is one of the reasons that this project is not the solution to our climate emergency.

Additional remarks

We found the tone of EDF to be very much “we are going to build this, you stay out of the way”. Much of the conversation seemed tantamount to admitting that EDF cannot deal with so complex and plan.

Stop Sizewell C lacks the resources and technical expertise to be able to constructively engage with the development of this document, but we recognise its critical importance. We therefore appeal to the Inspectors to act in the best interests of affected communities at all times in respect to the parameters proposed for the DCO; especially - with specific regard to Theberton and Eastbridge - on traffic, the accommodation campus and construction site operation, including the borrow pits, spoil heaps and worksites close to Eastbridge.

ISH4 - Socio-economics and Community Issues.

Summary of oral submissions

In terms of the assurances that the Hinkley Point workers and supply chain wouldn't be coming here, I observed a parliamentary briefing earlier this year where I heard Humphrey Cadoux Hudson of EDF being asked whether he intended to bring bring the skilled Hinkley Point workforce to Suffolk and his reply was “that is our vision” (briefing to MPs. January 2021)

The nuclear industry association report published last September about reducing costs, specifically stated that the supply chain serving Hinkley Point will also be in a strong position to bid for and win work with other developers in the UK, evidently, including Sizewell C. Given the government's insistence that this project show value for money and the need to reduce costs and reduce risk, which with EPR projects has been an issue, you can understand our concerns.

We also highlighted the report published by KPMG about severe labour shortages

www.home.kpmg/uk/en/home/media/press-releases/2021/07/kpmg-and-rec-uk-report-on-jobs.html

Additionally we referred to a number of contradictions in statements made by the Applicant, especially by Mr Hunt, some of which we pointed out during the hearing but are listed below in more detail.

During Socio-economics Mr Hunt suggested:

- a) That the area would benefit from spending by workers ([EV-102](#) @ 49.25: *"There will be spending by the project and there will be businesses and lots of [locations], which will benefit they'll be spending by workers. And Mr. [Cusack] mentioned things like pubs and shops, obviously, our workers are going to be spending money"*)
- b) That tourism surveys were tricky because it was very hard to predict people's future behaviour ([EV-103](#) @ 1.17.00 *"we are regrettably as human beings, notoriously bad predictors of our own behaviour"*)
- c) That it was not the intention to flood the area with Hinkley workers ([EV-102](#) @ 50.21: *"there are expertise there, and ways of working that we've learned that we intend to bring over. But that doesn't mean that every opportunity will go to a company or a worker that's previously worked on Hinkley Point C"*)

During the Community Issues session later that same day Mr Hunt

- a) Said that Sizewell C workers would go back to the campus after a day's work, have a meal there and go to bed, suggesting they would NOT be out spending locally ([EV-105](#) @ 54.07) *"you know, things like the accommodation campus means that people are not living in the community, they will walk to work and they will go home from work and they'll get something to eat and they'll go to bed"*
- b) That the Applicant was able to wholly predict the characteristics of the workforce, and indeed that in many cases they would be people already known to the Applicant from Hinkley Point C ([EV-105](#) @ 54.07) *"in many cases, the same people, literally identically those individuals, they will drive 250 miles east. And the assumption is that somehow in that journey, they become three and a half times more criminal than they've been at Hinkley Point C."*

Additional remarks

Supply Chain opportunities

With respect to the potential scale of supply chain opportunities, we are concerned that Mr Hunt provided oral evidence to the hearings on behalf of the Applicant that contradicts key aspects of the written evidence submitted by the Applicant in support of the proposed development.

The starting point is the issue raised by Mr Lucas, who expressed concern that the scale of local supply chain employment opportunities is substantially overstated in the Applicant's evidence, because it appeared to be calculated on the basis of region-wide effects that have been estimated so far across the South West region plus South Wales.

Shortly after the start of the second session, Mr Hunt was invited by Mr Philpott to respond on behalf of the applicant, as he did so as follows: ([EV-103](#) @ 07.43)

So, if I just start with the point about regional benefits, or the location of benefits, and I think the point that was made about the difference in size, between the Hinkley area and Sizewell area. And just to be absolutely clear, we are not comparing Norfolk and Suffolk, with the Hinkley region, we are comparing the East of England region with the Hinkley region, and they are broadly the same sort of size. So, when we are saying the supply chain benefits and benchmarking against Hinkley, that is marking them against an area of broadly similar size in terms of businesses and jobs.

However, when this response is compared to what is stated by the Applicant in paragraphs 3.4.1 to 3.4.13 of the Economic Statement ([APP-610](#)) it is clear that Mr Hunt's explanation is incorrect.

The relevant part of the Economic Statement is as follows:

The total cost of the Sizewell C Project is estimated at £20 billion. It is anticipated that – if similar activities and local supply chain recruitment are achieved at Sizewell C as Hinkley Point C, there could be a "local" retention of in excess of £1.5bn over the construction phase, equivalent to an average of £125m per year. (Economic Statement, paragraph 3.4.13).

It can be noted that the retention figure of £1.5 billion equates to 7.5% of the total cost estimate of £20 billion.

The estimation of the £1.5 billion figure is based on the following assumptions:

- First, an estimated total construction phase cost for the Sizewell C project of £20 billion, referred to in paragraph 3.4.13; and
- The reference to ‘around 7%’ of Hinkley Point C being spent regionally in paragraph 3.4.10 of the Economic Statement (emphasis added).

It is worth quoting para 3.4.10 from the Economic Statement, as it is clearly stated that the 7% figure does not just consist of local spending:

*As set out in the Supply Chain Strategy in Appendix B, committed local **and regional** spend at Hinkley Point C increased after the publication of the BEIS report referenced above, and stood at £1.55 billion at the end of 2018. This committed regional spend equates to around 7% of total spend on the Hinkley Point C project, and is likely to grow further (Economic Statement, para 3.4.10, emphasis added).*

Moreover, a reading of the *Hinkley Point C Wider Benefits Realisation Plan* (2018) published by the Department for Business, Energy and Industrial Strategy makes it clear that the spatial area that has been included in the local and regional assessment not only covers all of the South West England region, but it also extends to of South Wales, from Newport and Monmouthshire in the east, extending as far as west as Carmarthenshire and Pembrokeshire in the west.¹

In summary, in para 3.4.13 the applicant claims that £1.5 billion in supply chain expenditure could benefit local businesses. However, it is clear from the submitted evidence that this quantification of potential impact is at best figure that is only appropriate to be used at a regional level, which not only covers Norfolk and Suffolk but also extends to the counties of Essex, Hertfordshire, Bedfordshire, and Cambridgeshire. In other words, well beyond the boundaries of the what could be reasonably considered as localised impacts.

On this basis, the suggestion that local supply chain benefits could amount to anything close to £1.5 billion is incorrect. The applicant appears to be presenting evidence of potential region-wide impacts but is passing these estimates off as estimates of local impact. This approach is both confusing and incorrect.

ISH5 - Landscape and Visual Impact

Summary of oral submissions

We welcome the strong encouragement to the Applicant to provide more realistic visualisations of the project during construction and strongly suggest these should be done from multiple viewpoints, including Sizewell beach north and south of the site, Dunwich Heath and Whin Hill.

We maintain that it is possible such visualisations may generate even more serious survey results on tourism impacts.

Mrs Cassini asked Stop Sizewell C to point out which of the Applicant’s images were out of date or misleading. We would be happy to provide such a list but as the Applicant announced verbally that the location of the HCDF would be changing, it did not seem to be a good use of our scarce time until we know what the next iteration of plans looks like. However we do consider partial visualisations, such as those provided of the temporary and permanent Beach Landing Facilities which are not shown in context to be unhelpful ([AS-291](#)).

¹ BEIS (July 2018) Hinkley Point C Wider Benefits Realisation Plan