



Cllr Richard Rout
Deputy Cabinet Member
Nationally Significant Infrastructure Projects
Suffolk County Council

By email only to:

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21 November 2024

Dear Cllr Rout,

RE: The solar energy supply chain: a request to ensure solar Nationally Significant Infrastructure Projects (NSIPs) have no links to modern slavery

Thank you for your letter dated 25 October 2024 concerning the above matter. Within it, you requested details setting out how Sunnica Ltd ('Sunnica') will rule out any links between the Sunnica Energy Farm and modern slavery, including forced labour.

We are committed to ensuring that there are no links between the Sunnica Energy Farm project and modern slavery.

Both of the joint venture partners that are progressing Sunnica (PS Renewables and Tribus Clean Energy) are signatories to Solar Energy UK's Industry Supply Chain Statement¹ that sets out the industry's commitment to ensuring that it is free of any human rights abuses, including forced labour, anywhere in the global supply chain.

Sunnica recognises that the implementation of, and adherence to, the measures included within the Solar Stewardship Initiative (SSI)² are central to making this commitment a reality.

Any procurement process for components used within the Sunnica Energy Farm project would adhere to the SSI and the measures contained within our made Development Consent Order (DCO). The adherence to DCO requirements relating to the supply chain will be overseen by the local authorities and any breach of them would constitute a criminal offence.

Together, these measures should give confidence that the procurement process carried out for Sunnica Energy Farm will ensure that the project has no links to modern slavery.

I will outline the measures secured within our DCO, the SSI, and our approach to this matter in the remainder of this letter.

¹ Available at: <https://solarenergyuk.org/supply-chain-statement/>

² Solar Stewardship Initiative (SSI), available at: <https://www.solarstewardshipinitiative.org/resources/>

Controls within the Development Consent Order

I first wanted to draw your attention to the measures included within the Sunnica Energy Farm DCO.

At schedule 2, requirement 20 the DCO sets out:

“(1) No phase of the authorised development may commence until a skills, supply chain and employment plan in relation to that phase has been submitted to and approved by the relevant planning authority for that phase or, where the phase falls within the administrative areas of both the District of West Suffolk and the District of East Cambridgeshire, both relevant planning authorities.”

(2) The skills, supply chain and employment plan submitted under sub-paragraph (1) must be substantially in accordance with the outline skills, supply chain and employment plan.

(3) The skills, supply chain and employment plan must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with the construction, operation and maintenance of the authorised development, and the means for publicising such opportunities.

(4) The skills, supply chain and employment plan must be implemented as approved and maintained throughout the construction and operation of the authorised development and during the carrying out of decommissioning works.”

As a result, the project will be required to work with the local authorities to agree the Skills, Supply Chain and Employment Plan (SSCEP) and must adhere to it during construction, operation, and decommissioning.

I have appended the latest version of the Outline Skills, Supply Chain and Employment Plan (OSSCEP) to this letter. The OSSCEP will be updated and will require the approval of the local authorities ahead of procurement taking place.

Within the OSSCEP at 5.4.13, Sunnica has specified that: *“Proposed ethical procurement policies include:*

- *any potential supplier must complete a modern slavery supplier due diligence questionnaire as part of the tender exercise;*
- *any potential supplier that meets the statutory requirements under the Modern Slavery Act 2015 to prepare a modern slavery statement;*
- *any potential supplier must have a modern slavery policy;*
- *any potential supplier must provide relevant employees with modern slavery training;*
- *any contract to be entered into with a potential supplier must include the following warranties:*
 - *the supplier has not been and is not engaged in any form of slavery;*
 - *the supplier pays its workers in compliance with applicable employment laws and minimum wage requirements;*

- *the supplier will take reasonable steps to prevent slavery and human trafficking in connection with its business; and*
- *any contract to be entered into with a potential supplier must include:*
 - *a right of audit; and*
 - *a right of immediate termination in the event of any instances of slavery and human trafficking connected to the supplier.”*

The measures set out at 5.4.13 will be updated to account for the latest best practice when the final Skills, Supply Chain and Employment Plan (SSCEP) is submitted to the local authorities for their approval.

Sunnica is yet to finalise a timetable for procurement and can confirm that a decision on a preferred solar photovoltaic (PV) panel provider for the Sunnica Energy Farm project has not yet been made and nor is such a decision imminent.

We will be engaging with the local authorities to shape the final SSCEP and other matters relating to the Sunnica Energy Farm DCO during 2025. This ongoing engagement will give the local authorities sight of the actions that we are taking to ensure that the Sunnica Energy Farm supply chain is compliant and meets the high standards that we all expect.

Wider sector work on supply chain

Within your letter, you comment on the speed at which supply chain standards have been adopted by the UK solar industry and the level of the sector's commitment to such standards.

Solar Energy UK has engaged, and continues to engage, with the new government on the industry standard SSI.

Much work has already been done and is ongoing, the results of which will operationalise standards that will form part of the Sunnica procurement process. The ESG Standard from the SSI³ that you refer to in your letter is now being used in audits of manufacturing sites. The results of these are expected early next year and will lead to the first certifications of manufacturing sites under the standard.

The ESG Standard will be supplemented by the Supply Chain Traceability Standard⁴ which, as you note, is currently in draft form but has been the subject of consultation. The expectation is that sites will be audited against the final version of the Standard by the end of 2025.

³ Solar Stewardship Initiative (SSI) – ESG Standard (April 2024), available at:

<https://www.solarstewardshipinitiative.org/resources/>

⁴ Solar Stewardship Initiative (SSI) – Solar Stewardship Initiative Supply Chain Traceability Standard Draft Version (August 2024), available at: <https://www.solarstewardshipinitiative.org/ssi-standards/supply-chain-traceability-standard/>



The contents of both standards will be central to the Sunnica Energy Farm procurement process. Together, the two standards create an unbroken chain of custody for components throughout the supply chain.

I hope you find the contents of this letter helpful, we will be contacting officers at Suffolk County Council to discuss the Sunnica Energy Farm construction phase more broadly but if you have any further questions in the meantime, please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Luke Murray".

Luke Murray
Sunnica Ltd



Appendix A – Sunnica Energy Farm Outline Skills, Supply Chain and Employment Plan



SUNNICA ENERGY FARM

EN010106

Volume 7

7.7 Outline Skills, Supply Chain and Employment Plan

APFP Regulation 5(2)(q)

Planning Act 2008

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



Planning Act 2008

**The Infrastructure Planning
(Applications: Prescribed Forms and
Procedure) Regulations 2009**

Sunnica Energy Farm

7.7 Outline Skills, Supply Chain and Employment Plan

Regulation Reference:	Regulation 5(2)(q)
Planning Inspectorate Scheme Reference	EN010106
Application Document Reference	EN010106/APP/7.7
Author	Sunnica Energy Farm Project Team

Version	Date	Status of Version
Rev 00	18 November 2021	Application Version
Rev 01	11 November 2022	Submitted at Deadline 2
Rev 02	22 November 2022	Submitted at Deadline 3
Rev 03	3 March 2023	Submitted at Deadline 7
Rev 04	24 March 2023	Submitted at Deadline 10

Executive summary

Purpose

This Outline Skills, Supply Chain and Employment Plan (OSSCEP) has been prepared to accompany the Application for a Development Consent Order for the Sunnica Energy Farm (the Scheme). Its purpose is to maximise and pro-actively expand the economic benefits of the Scheme for the local community.

The OSSCEP sets out the likely economic benefits of the Scheme, and the context and characteristics of the local community and economy in which it is located. It then identifies potential opportunities for activities relating to Skills, Supply Chain and Employment (SSCE) which the Applicant could take forward post-consent. These activities will help local individuals and businesses access the SSCE benefits associated with the Scheme. The OSSCEP identifies means for publicising SSCE opportunities and for joint working with key partners going forwards. It also provides a framework for future delivery.

Economic Benefits of the Scheme

The Scheme spans four Sites which are connected by cable corridors and then connect to the National Grid Substation Extension. The 24 month construction period is expected to create total net employment of 1,685 jobs per annum (723 direct jobs and 962 indirect jobs). A large variety of roles and skills will be required, particularly skilled electrical engineers and PV panel assemblers. The main equipment requirements of the Scheme are electrical and landscaping equipment.

Local Community Profile

The characteristics of the workforce and economy were examined in order to set the context for the OSSCEP. A study area has been defined that constitutes the relevant labour market for the Scheme.

The study area has higher levels of unemployment, and lower levels of economic activity, than the regional and national rates. However, the level of qualifications in the study area is similar to the regional and national rate. No Lower Super Output Areas ('LSOA') in the study area are ranked in the top 10% most deprived parts of the country. A higher proportion of the workforce is employed by the construction sector in the study area compared to regional and national levels. However, the mining, quarrying and utilities sector employs a lower proportion of the study area workforce compared to regional and national levels.

Economic Policy and Strategy Context

Planning policies and economic development strategies relevant to the Scheme were identified at the national, regional, and local levels.

The Local Energy East (LEE) Strategy covers the three Local Enterprise Partnership (LEP) areas, and addresses how to achieve clean economic growth and secure, local, affordable, low-carbon consumption. The relevant Local Plans for the area identify

renewable energy as a target sector and aim to promote opportunities for the local workforce and supply chain, attempting to promote high quality and diverse job opportunities and reduce out-commuting. The relevant neighbourhood plans¹ for the area stress the need to protect and enhance community infrastructure and opportunities for local businesses. Promoting skills development is a common theme across all local and neighbourhood plans. The OSSCEP is therefore in accordance with planning policy and supports achievement of the aims which the relevant Local Plans identify relating to skills, supply chain and employment.

Opportunities

Seven potential opportunities or work areas, across skills, employment, and supply chain, have been identified that the Applicant could take forward.

Skills Opportunities

Opportunity 1 – Apprenticeships

The Applicant could consider a programme to promote apprenticeships during the various phases of the Scheme. The Applicant has already engaged with some key stakeholders in this area and the OSSCEP identifies other potential local partners of relevance.

Opportunity 2 – Other Workforce Training

The Applicant could also consider other interventions to support the training of employees and workers on the Scheme. This could include identifying gaps in the skills required to deliver the Scheme and supporting employees in gaining the relevant vocational qualifications to fill these gaps.

Opportunity 3 – STEM Education and Careers

The Applicant could investigate the potential for a programme of activities which promote science, technology, engineering, and mathematics (STEM) education and careers. This could be targeted at primary school pupils, secondary school pupils, college students and / or other young people in the area.

Employment Opportunities

Opportunity 4 – Local Recruitment

The Applicant will investigate measures to promote take up of jobs generated by the Scheme by local people. The starting point will be engagement with Local Authorities and Job Centre Plus, in order to tap into existing local employment support networks.

¹ The Fordham Neighbourhood Plan 2016-2036 (2018) and the Newmarket Neighbourhood Plan 2018-2031 (2020) are discussed in Section 4.

Opportunity 5 – Maximising Diversity of the Workforce

The Applicant will introduce initiatives to maximise the diversity of the workforce. This measure could relate to a variety of demographic or disadvantaged groups. The most appropriate target group(s) could be identified through consultation and research post-consent of the DCO.

Supply Chain Opportunities

Opportunity 6 - Business Networking and Support

The Applicant could work with local partners to communicate opportunities for purchasing and contracts arising from the Scheme to local businesses. This could include building on existing relationships with Suffolk Chamber of Commerce, Cambridgeshire Chamber of Commerce and Orbis Energy, as well as identifying other potential partners including the Local Authorities.

Opportunity 7 – Procurement Strategy

The procurement strategy for the Scheme could also be shaped to maximise opportunities to local businesses, whilst seeking to minimise associated environmental impacts and safeguarding human rights in the supply chain.

Delivery

Potential delivery arrangements for the OSSCEP are set out. These include an organisational framework with suggested roles and responsibilities, identification of key partners, and a timeline for development of a full SSCE plan and its implementation post-consent.

Monitoring

It is important that the Applicant's SSCE activities can be effectively monitored and measured. Potential methods for performance monitoring are set out, including some illustrative outputs and outcomes which would indicate if the objectives and aims of the OSSCEP are being achieved.

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1 Introduction

1.1 Purpose of this Report

- 1.1.1 The Sunnica Energy Farm (the Scheme) will generate substantial economic benefits including new jobs and expenditure, as established in **Section 12.8 of Chapter 12: Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1]. The Applicant aims to maximise and pro-actively expand these benefits for the local community.
- 1.1.2 This Outline Skills, Supply Chain and Employment Plan (OSSCEP) is an important early step in achieving this goal. It sets out the likely economic benefits of the Scheme, and the context and characteristics of the local community and economy in which it is located. It describes the initial work which has been undertaken by the Applicant to identify of the potential workers, skills, equipment and services required to deliver the Scheme, and to engage with relevant stakeholders. The OSSCEP goes on to identify potential opportunities for activities relating to Skills, Supply Chain and Employment (SSCE) which the Applicant could take forward post-consent. These activities will help local individuals and businesses access the SSCE benefits associated with the Scheme. The OSSCEP identifies means for publicising SSCE opportunities and for joint working with key partners going forward. It also provides a framework for future delivery.
- 1.1.3 This document is an outline plan that will develop into a more detailed Skills, Supply Chain and Employment (SSCE) plan, which will be secured through a requirement included in the DCO for the Scheme. The SSCE plan will be subject to approval by the relevant planning authorities – West Suffolk Council and East Cambridgeshire District Council.
- 1.1.4 **Chapter 12: Socio Economics and Land Use** of the Environmental Statement [EN010106/APP/6.1] identifies no relevant adverse effects of the Scheme. Therefore, this OSSCEP does not represent mitigation of any such effects, but rather a plan to help maximise the positive gain for the local community.

1.2 The Scheme

- 1.2.1 The Scheme is a new solar energy farm proposal that would deliver electricity to the national electricity transmission network. Sunnica Limited, as the promoter of the Scheme and the Applicant for the DCO, is proposing to install ground mounted solar photovoltaic (PV) panel arrays to generate electric energy from the sun. The Scheme will also include a Battery Energy Storage System (BESS). Both the PV panel arrays and BESS will connect to the Burwell National Grid Substation in Cambridgeshire.
- 1.2.2 Electricity will be generated at Sunnica East Site A, near Isleham in Cambridgeshire; Sunnica East Site B, near Worlington and Freckenham in Suffolk; Sunnica West Site A near Chippenham and Kennett in Cambridgeshire; and Sunnica West Site B, near Snailwell in Cambridgeshire. All locations will

comprise ground mounted solar PV panel arrays, supporting electrical infrastructure and, with the exception of Sunnica West Site B, a BESS.

- 1.2.3 Supporting electrical infrastructure will include onsite substations on Sunnica East Site A, Sunnica East Site B and Sunnica West Site A, and on-site cabling between the different electrical elements across the Scheme. The generating equipment of the Scheme will be fenced and be protected via security measures such as Closed Circuit Television and lighting. Inside the fenced areas, in addition to the generating equipment, will be internal access tracks and drainage. It is not proposed for any area to be continuously lit.
- 1.2.4 Visual, ecological and archaeological mitigation is proposed which includes proposed grassland planting and new woodland; retention of existing woodland, wetlands and other vegetation; and offsetting areas where there will be no development. The BESS will consist of a compound and battery array to allow for the importation, storage and exportation of energy to the National Grid. There will also be areas at Sunnica East Site A and Sunnica East Site B for office and storage facilities for use during the Scheme's operation.
- 1.2.5 The Scheme will be connected to a new substation extension at the existing Burwell National Grid Substation, using 132 kilovolt (kV) cables buried underground. The cables will run between Sunnica East Site A, Sunnica East Site B and Sunnica West Site A (Grid Connection Route A), and then from Sunnica West Site A to Sunnica West B and onwards to the Burwell National Grid Substation (Grid Connection Route B). The Burwell National Grid Substation Extension will convert the 132kV electricity to 400kV. The 400kV cables will be buried and will connect the Scheme to the existing Burwell National Grid Substation to allow distribution to the national transmission network.
- 1.2.6 The indicative timescales for the construction and operation of the Scheme that have been assumed² for the purposes of the Environmental Impact Assessment is as follows:
- a. It is currently anticipated that (subject to the necessary consents being granted) construction work will commence, at the earliest, in Summer 2023 and will run for 24 months. This assumes the Scheme is built in a single phase.
 - b. It is currently anticipated that the earliest the Scheme will commence commercial operation will be from Summer 2025. Depending on the final construction programme and commencement of construction, operation may overlap with the construction. It is possible that, once the grid connection has been constructed and parts of the Scheme have been connected to the National Grid, these areas could begin operation while other parts are still being constructed and connected; and
 - c. The operational life of the Scheme has been assessed to be 40 years and decommissioning is therefore estimated to be no earlier than 2065. Some parts of the Scheme may be decommissioned earlier if the landowner requires

² These timescales represent a worst-case scenario assessment in the ES and have been used in this OSSCEP for the purpose of consistency. More detail is available in **Chapter 3: Scheme Description** of the Environmental Statement [EN010106/APP/6.1].

it. Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases.

- 1.2.7 The Scheme is located within the administrative areas of Cambridgeshire County Council; Suffolk County Council; East Cambridgeshire District Council and West Suffolk Council.

1.3 Structure of this Document

- 1.3.1 The remainder of this document is structured as follows:

- a. Section 2 summarises the scale and nature of likely economic effects of the Scheme, which the OSSCEP aims to maximise. The key impacts comprise jobs generated during the construction, demolition and decommissioning phase, and spending on goods and services.
- b. Section 3 summarises the aims of local planning policy and economic development strategy with regard to jobs, skills and economic development.
- c. Section 4 presents a profile of the local population, workforce and economy, in order to understand how a SSCE plan can best meet local needs and maximise economic benefits of the Scheme for the local community.
- d. Section 5 presents a long-list of potential opportunities for the Scheme relating to SSCE. Within each opportunity or area of work, a number of activities are described which could be developed in more detail and pursued post-consent.
- e. Section 6 proposes a broad approach to developing and delivering the OSSCEP post-consent, including a potential organisational structure and partnerships. An indicative timeline for SSCE plan development and implementation is also set out.
- f. Section 7 describes elements of a potential monitoring framework, including potential target outputs and outcomes.

2 Summary of Economic Benefits

2.1 Introduction

- 2.1.1 This section summarises the scale of employment and GVA benefits that may arise from delivery of the Scheme. It also summarises the type of jobs, skills, equipment, and materials required for the delivery of the Scheme.

2.2 Summary of Employment and GVA Benefits

- 2.2.1 The employment and GVA benefits associated with the construction, operation and decommissioning of the Scheme are summarised in the sections below. Full details are available in **Chapter 12: Socio-economics and Land Use** of the Environmental Statement [EN010106/APP/6.1].

Study Area

- 2.2.2 The study area for assessment of economic impacts has been defined in accordance with Homes England's 'Additionality Guide, A Standard Approach to Assessing the Additional Impact of Projects, 4th Edition' (the HCA Additionality Guide) (Ref 1).
- 2.2.3 The potential economic impacts arising from the Scheme (e.g. employment) are considered relative to a 45 minute travel study area (based on driving times). This represents the principal labour market catchment area for the Scheme, particularly given the absence of a functional economic market area within local policy. After consultation with the local authorities, it was agreed that a 45 minute travel study area incorporates the population that may reasonably be expected to travel to, and benefit from economic impacts arising from the Scheme and constitutes the relevant labour market for the Scheme.

Construction (no earlier than 2023)

Employment

- 2.2.4 The Applicant estimates that the Scheme will require an average of 964 gross Full-time Equivalent (FTE) construction jobs on-site per day during this construction period. The peak number of staff across the Scheme is forecast to occur in month 9 of the construction period with 1,393 staff per day. Across the entire construction period the average number of staff required for the Sunnica West Sites is forecast to be 416 staff, 502 staff for the Sunnica East Sites and 46 staff for the three on-site substations, Burwell National Grid Substation Extension, and the cable corridor, resulting in an average of 964 staff per day across the Scheme.
- 2.2.5 Based on Census 2011 data and the HCA Additionality Guide, a 12% leakage adjustment has been applied to the above estimate. This is to account for the jobs filled by individuals outside of the study area.
- 2.2.6 Based on the HCA Additionality Guide, a displacement factor of 25% is also applied. This is to account for construction workers moving between projects when faced with delays or deadlines.

- 2.2.7 Based on the Centre for Economics and Business Research's (CEBR) Solar Powered Growth in the UK report, a multiplier effect of 2.33 has also been applied. This is to account for indirect and induced effects of the construction activity on local employment.
- 2.2.8 The net additional construction employment, reflecting the above, is summarised in Table 2-1.

Table 2-1: Net additional construction employment per annum from the Scheme

	45 min travel Study Area	Outside Study Area	Total
Gross Direct Employment	848	116	964
Displacement	-212	-29	-241
Net Direct Employment	636	87	723
Indirect & Induced Employment	847	115	962
Total Net Employment³	1,483	202	1,685

Source: AECOM Calculations 2021

- 2.2.9 The impact of construction employment generation on the local economy has been assessed within the Environmental Statement as temporary medium beneficial, which results in a medium-term temporary moderate beneficial effect. This is considered significant.

Gross Value Added (GVA)

- 2.2.10 In East Cambridgeshire, the average GVA per worker in the construction sector was £62,608 in 2015 (Ref 2 and Ref 3). In West Suffolk, the GVA per worker in the construction sector was £63,157. Therefore, by taking an average of both GVA figures, this results in a final figure for the study area of £62,883 GVA per worker in the construction sector. By applying this figure to the total construction workers generated by the Scheme, it is estimated the construction phase will contribute £58 million to the economy, of which £51m is within the 45-minute travel study area; as shown in Table 2-2.

Table 2-2: GVA per annum from the Scheme

	45 min travel Study Area	Outside Study Area	Total
GVA during the construction phase (£)	£51,020,751	£6,957,375	£57,978,126

Source: AECOM Calculations 2021

- 2.2.11 The impact of GVA generation from the construction phase on the local economy has been assessed in the Environmental Statement as medium-term temporary medium beneficial, which results in a temporary moderate beneficial effect. This is considered significant.

³ Sum of Net Direct Employment and Indirect & Induced Employment.

Operation (no earlier than 2025)

- 2.2.12 It is anticipated that there will be up to 17 permanent staff onsite during the operational phase during a single shift, with staff working on a three-shift pattern. 17 permanent staff is a forecast but there could be more at points during the operational phase.
- 2.2.13 Assuming a leakage of 12% outside the study area, displacement of 25% and a 2.33 multiplier, it is estimated that the Scheme will result in a net creation of an estimated 30 jobs, of which at least 26 are within the study area.
- 2.2.14 This calculation must also consider 'deadweight'. This refers to outcomes which would have occurred without intervention. There is expected to be no employment loss as a result of the Scheme, however, there may be some temporary agricultural jobs which will no longer be offered. This has been estimated to be close to two FTE jobs related to agricultural activities. Considering these are not permanent jobs which are being lost, the 'deadweight' employment has been assessed as one permanent job lost.
- 2.2.15 The net employment during operation, reflecting the above assumptions, is summarised in Table 2-3.

Table 2-3: Total net employment during operation of the Scheme

	Study Area	Outside Study Area	Total
Gross Direct Employment	15	2	17
Displacement	-3	-1	-4
Net Direct Employment	12	1	13
Indirect & Induced Employment	16	1	17
Deadweight Employment	-1	0	-1
Total Net Employment⁴	27	2	29

Source: AECOM Calculations 2021

- 2.2.16 It should be noted that the actual number of jobs generated by the Scheme may be greater than those represented in Table 2-3 as part-time staff will be created to perform maintenance and engineering works from time to time to ensure the Scheme is operational over its operational life.
- 2.2.17 The impact of operational employment generation on the local economy has been assessed in the Environmental Statement as permanent, very low beneficial. This results in a permanent negligible effect, which is not considered significant.

⁴ Sum of Net Direct Employment and Indirect & Induced Employment minus Deadweight Employment.

Decommissioning (no earlier than 2065)

- 2.2.18 It is estimated that there will be fewer workers needed during the decommissioning phase than during construction, with an average of 139 staff per day. Therefore, it is estimated that 139 gross FTE jobs will be generated on-site per day during this decommissioning period.
- 2.2.19 Table 2-4 summarises the temporary employment generated by the Scheme during decommissioning, accounting for leakage, displacement, and multiplier effects as identified in the above section describing construction period employment.

Table 2-4: Net additional decommissioning employment per annum from the Scheme

	Study Area	Outside Study Area	Total
Gross Direct Employment	122	17	139
Displacement	-31	-4	-35
Net Direct Employment	91	13	104
Indirect & Induced Employment	121	17	138
Total Net Employment⁵	212	30	242

Source: AECOM Calculations 2021

- 2.2.20 The impact of decommissioning employment generation on the local economy has been assessed in the Environmental Statement as temporary medium beneficial, which results in a medium-term temporary moderate beneficial effect. This is considered significant.

2.3 Summary of Jobs and Skills Requirements

- 2.3.1 The Applicant has identified the potential types of jobs and skills likely to be required during the construction and operation phases of the Scheme. This information is summarised in Table 2-5.

⁵ Sum of Net Direct Employment and Indirect & Induced Employment

Table 2-5: Summary of Jobs and Skills Requirements

Phase	Job Name	Job Description	Skills
Construction	Civil Workers	Preparation of the Sites. Work includes: <ul style="list-style-type: none"> the removal and storage of topsoil and levelling of the land as required; preparation and build of any access roads, internal to the site and for access onto and away from the site; the digging of trenches for wiring; and preparation for and laying foundations for the solar stations, on-site substations and BESS. 	Use of machinery, such as dump trucks, diggers and compactors.
	Labourers	Labour to place wiring and ducting in the trenches and to transport materials as required around the Sites.	No specific qualifications required.
	Building Construction	Labour to build the storage sheds.	Relevant construction qualifications required.
	Racking Structure Assembler	Manage a ramming machine to create the solar structure and assemble the associated structures.	Skilled workers required to control the ramming machines. Less skilled workers required to assemble other components of the structures.
	Panel Assembler	Individuals to manage the process of mounting the solar modules onto the structures.	Knowledge of electromechanics tools required.
	Low Voltage (LV) Electrical Engineers	Connecting the panels with inverters and solar stations.	Skills for LV wiring and installation of equipment required.
	Medium Voltage (MV) Electrical Engineers	Connecting the solar stations with the on-site substations.	Skills for MV wiring and installation of equipment required.
	High Voltage (HV) Electrical Engineers	Connecting the on-site substations and transformers with the transmission network.	Skills for HV wiring and installation of equipment required.
	Security Guards	Protecting the site during the construction process.	Protect the security of the site during construction.
	CCTV Workers	Setting up the security system.	Installation of CCTV system and equipment.
	Fencing Installation Workers	Installation of the perimeter fencing including any gates for access.	Installation of fencing.

Phase	Job Name	Job Description	Skills
	Landscape Installation Workers	Installation of all landscaping, such as planting.	Installation of the landscaping works area.
Operations	Electrical Engineers	To monitor and trouble-shoot any problems.	LV, MV, and HV electrical specialists required.
	Performance Managers	To monitor and trouble-shoot any problems via software remotely from the office.	
	CCTV and Security	To monitor security of the site.	
	Landscape Monitoring and Managers	To deliver watering strategy and monitor and maintain the landscape/ecology areas within the Scheme.	

2.4 Summary of Equipment Requirements

2.4.1 The Applicant has identified the likely equipment and material requirements for each element of the Scheme. This information is summarised in Table 2-6.

Table 2-6: Summary of Equipment and Material Requirements

PV Park	BESS	Substations
Transformer	Transformer	Transformer
Switchgear (cells)	Switchgear (cells)	Switchgear (cells)
HV Cable	HV Cable	HV Cable
LV Cable	LV Cable	LV Cable
Earthing	Earthing	Earthing
Civil Materials (e.g. gravel)	Civil Materials (e.g. gravel)	Civil Materials (e.g. gravel)
Module	BESS	Fence
Inverter	Inverter	CCTV
Racks/Structure	Fence	
CCTV	CCTV	
Fence		

2.4.2 The Applicant has undertaken initial investigations to identify what equipment and materials can be sourced locally.

3 Local Community Profile

3.1 Overview

- 3.1.1 This chapter identifies characteristics of the local population, workforce and economy which are relevant to developing an SSCE plan which effectively meets local needs and maximises the benefits of the Scheme.
- 3.1.2 This Local Community Profile uses the study area defined in Section 2.2, i.e. a 45 minute travel study area (based on driving).

3.2 Population

- 3.2.1 The evidence in this section is primarily based on Office for National Statistics (ONS) Census 2011 data, NOMIS (official labour market statistics) datasets, and housing market data from the Land Registry online which provides data for Lower Super Output Areas (LSOAs)⁶ and Middle Super Output Areas (MSOAs) and allows for an analysis of the characteristics of the study area. While this data is not recent, it provides the most robust evidence base for local level data as it is the most recent data source to provide the required level of geographic breakdown. Alternative and more recent datasets are presented where available and appropriate.
- 3.2.2 The study area has a residential population of 133,600, this has increased from 124,700 in 2008 to 133,600 in 2018, representing a 7% increase over ten years (Ref 4). These population growth rates are in line with the overall rates recorded for the East of England and England and Wales during the same time period (9% and 3.7% respectively).
- 3.2.3 In 2018, 82,013 (61.3%) of residents within the study area were of working age (defined by ONS as men and women aged 16 to 64). This is a similar rate to the rates recorded for the East of England (61%) and England and Wales as a whole (62.8%) (Ref 5).
- 3.2.4 According to the Annual Population Survey (Ref 5), the unemployment rate among working age residents in the study area in 2018 was 4.2%, higher than East of England (3.2%) and England and Wales (3.9%).
- 3.2.5 Residents of working age residing in the study area in 2019 had an economic activity rate of 71.8%. This rate is lower than recorded for England and Wales (78.9%) and the East of England 80.6%. This is shown in Table 3-1.

Table 3-1: Economic Activity and Unemployment Rates

Economic Indicator	Study Area	East of England	England and Wales
Economic activity rate (for residents aged 16-64)	71.8%	80.6%	78.9%

⁶ Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. Lower Layer Super Output Areas are built from groups of contiguous Output Areas and have been automatically generated to be as consistent in population size as possible, and typically contain from four to six 'Output Areas'.

Economic Indicator	Study Area	East of England	England and Wales
Unemployment rate (for residents aged 16-64)	4.2%	3.2%	3.9%

- 3.2.6 In the study area, 28% of working age residents have a degree level qualification or higher (National Vocational Qualification (NVQ) Level 4+) (Ref 5), similar to the rate for England and Wales (27%) and the East of England (26%). However, the proportion of residents in the study area with no qualifications is 22%, which is slightly lower than the proportion recorded for East of England and England and Wales (both 23%).
- 3.2.7 The proportion of residents in the study area engaged in level 3 and 4 Standard Occupation Classification (SOC1-3) occupations (43%) is slightly higher than that recorded for both East of England (41%) and England and Wales (41%). The proportion of residents in the study area in elementary occupations (10.2%) is slightly lower than recorded for East of England (11%) and England and Wales (11%).
- 3.2.8 Based on the 2019 Indices of Multiple Deprivation (IMD) (Ref 6), West Suffolk is the 176th most deprived borough out of 326 districts in England (where 1 is the most deprived), and the 20th most deprived out of 47 districts in the East of England. East Cambridgeshire is less deprived in comparison with a rank of 272nd most deprived borough out of 326 districts and 38th most deprived out of 47 districts in the East of England. No LSOAs in East Cambridgeshire or West Suffolk are ranked in the top 10% most deprived parts of the country.

3.3 Workforce

- 3.3.1 In 2018, the workforce of the study area comprised around 83,345 employees compared to a workforce of around 168,000 employees in East Cambridgeshire (Ref 4). According to the most recent data on commuting patterns from the 2011 Census, a majority (60%) of the workforce in the study area also live in the area (Ref 7).
- 3.3.2 Table 3-2 presents a detailed breakdown of employment by broad industry group in the study area, the East of England, and England and Wales. Based on the most recently available data from the 2011 Census on employment by group within the study area's economy, the highest levels of employment are recorded in the health sector (18.5% of employment) and professional, scientific & technical (15.5%) sectors.
- 3.3.3 The construction sector contributes 7% of employment within the study area, more than the proportion recorded regionally (6%) and nationally (5%). There are around 4,900 construction jobs found within the study area.
- 3.3.4 In addition, the mining, quarrying and utilities broad industrial group (which includes employment from the generation of energy) is slightly less prominent in the study area compared to regional and national levels. This group represents 0.4% in the study area, lower than both regional and national levels (1.3% and 1.2% respectively).

Table 3-2: Employee Jobs by Broad Industrial Group in 2018

Sector	Study Area (%)	East of England (%)	England and Wales (%)
Agriculture, Forestry & Fishing	0.1	1.6	0.6
Mining, Quarrying & Utilities	0.4	1.3	1.2
Manufacturing	8.0	7.4	8.2
Construction	7.0	6.0	5.0
Motor Trades	2.0	2.5	1.7
Wholesale	4.0	4.4	3.9
Retail	6.0	9.6	9.5
Transport & Storage	5.0	5.5	4.7
Accommodation & Food Services	5.0	6.6	7.4
Information & Communication	2.0	3.4	4.5
Financial & Insurance	0.8	2.3	3.5
Property	1.1	1.7	1.7
Professional, Scientific & Technical	15.5	9.8	8.5
Business Administration & Support	7.4	10.3	9.2
Public Administration & Defence	3.1	2.9	4.1
Education	13.3	8.9	9.0
Health	18.5	11.6	13.0
Arts, Entertainment, Recreation & Other	2.8	4.2	4.5

Source: Census 2011, Business Register and Employment Survey 2018

- 3.3.5 GVA is a measure of value of goods and services produced in an area of the economy. In 2015, East Cambridgeshire generated around £1.9 billion GVA at current basic prices within its economy and West Suffolk generated around £1.3 billion GVA (Ref 8).
- 3.3.6 East Cambridgeshire's GVA per head in 2015 was £22,000, which is similar to West Suffolk with £21,041 GVA per head. Both districts recorded slightly lower rates than the regional average for the East of England (£23,901) and for England and Wales (£25,722). These statistics suggest that both district's economies are underperforming compared to regional and national indicators.

4 Economic Policy and Strategy Review

4.1 Introduction

- 4.1.1 It is important to understand the economic development aims and aspirations of local stakeholders, as these set the context for, and are also key drivers of, the OSSCEP.
- 4.1.2 For this reason, a review has been undertaken of the planning policy and economic development strategies of the administrative bodies local to the Scheme. Documents which are relevant for the Scheme's OSSCEP are listed below, followed by the key relevant policies and messages from these documents.

National Policy

- a. Overarching National Policy Statement (NPS) for Energy (EN-1) (2011) (Ref 9)
- b. Draft Overarching National Policy Statement (NPS) for Energy (EN-1) (2021) (Ref 10)
- c. National Planning Policy Framework (NPPF) (2021) (Ref 11)

Regional and Local Policy and Strategy

- a. Tri-LEP Local Energy East Strategy (2018) (Ref 12)
- b. East Cambridgeshire Local Plan (2015) (Ref 13)
- a. Forest Heath District Council Core Strategy (2010) (Ref 14)
- b. Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (2015) (Ref 15)
- c. Fordham Neighbourhood Plan 2016-2036 (2018) (Ref 16)
- d. Newmarket Neighbourhood Plan 2018-2031 (2020) (Ref 17)
- e. Transforming Suffolk: Suffolk Community Strategy 2008-2028 (2008) (Ref 18)

4.2 Key Messages

National Policy Statement (NPS) for Energy

- 4.2.1 Section 5.12 of the NPS EN-1 states that all relevant socio-economic impacts should be assessed, including the following which are relevant to this OSSCEP:
 - a. The creation of jobs and training opportunities.
 - b. The provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities.

Draft National Policy Statement (NPS) for Energy

- 4.2.2 A new draft of NPS EN-1 is out for consultation, until 29th November 2021.
- 4.2.3 Whilst, "The 2021 amendments will have effect only in relation to those applications for development consent accepted for examination after the

designation of those amendments,” it should be noted that, “any emerging draft NPSs (or those designated but not having effect) are potentially capable of being important and relevant considerations in the decision-making process.”

- 4.2.4 The draft NPS largely replicates the existing NPS EN-1, however it adds the following statement (Section 5.13) that, “Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK’s transition to Net Zero”.

National Planning Policy Framework

- 4.2.5 The NPPF sets out the Government’s planning policies for England and how these should be applied. Paragraph 81 states that, “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.” (Ref 9).

Local Energy East Strategy (2018)

- 4.2.6 The Local Energy East (LEE) Strategy joins together Cambridgeshire and Peterborough Local Enterprise Partnership (LEP), Hertfordshire LEP and New Anglia LEP to create a tri-LEP area project. Formulation of the strategy included consultation with local education providers and energy sector businesses.
- 4.2.7 The strategy is broken down into key themes. Those relevant to the Scheme are:
- a. clean economic growth; and
 - b. secure, local, affordable, low-carbon consumption.
- 4.2.8 The objectives for achieving clean economic growth are to:
- a. Build on our existing centres of excellence and develop new ones that support sectoral growth. The LEPs will work with BEIS to develop a renewable energy office based in the LEE area;
 - b. Build on existing supply chain initiatives such as SCORE (Supply Chain Innovation for Offshore Renewable Energy) in order to promote opportunities for SMEs in the renewables sector;
 - c. Support sector funding through initiatives like the University of East Anglia’s Low Carbon Innovation Fund (LCIF);
 - d. Support networking across the sector through initiatives such as Cambridge Cleantech and existing networks like Orbis Energy and the East of England Energy Group; and
 - e. Invest in infrastructure needed to support the energy sector. This includes working with Highways England and local planning authorities to develop key transport links. For example, dualling of the A47 and A12 are already being

developed via the Suffolk Energy Gateway project to bring coastal energy centres into closer proximity with other major towns in the region.

- 4.2.9 The objectives for achieving secure, local, affordable, low-carbon consumption are to:
- a. Work with education providers and industry to mobilise industry leadership to advocate for more apprenticeships in the energy sector, particularly higher-level apprenticeships. The LEPs will also work with local training centres to ensure local provision of relevant skills;
 - b. Work with schools, colleges, university and businesses to ensure that a clear pathway into the offshore energy sector is defined as the government rolls out the new T-levels. The LEPs will work to address the 'fragility' of skills supply;
 - c. Develop in partnership with industry and education providers a higher technical engineering offer;
 - d. Support 'intra-industry' and 'inter-sector' workforce transferability; and
 - e. Ensure that this agenda is reflected in the priorities of the new Skills Advisory Panels.

East Cambridgeshire Local Plan (2015)

- 4.2.10 East Cambridgeshire District Council is aiming to deliver 9,200 new jobs over the plan period (2015-2031).
- 4.2.11 New economic development should focus on the provision of higher skilled jobs to combat increasing levels of out-commuting from the District.
- 4.2.12 East Cambridgeshire District Council will support proposals for renewable energy schemes wherever possible.

Forest Heath District Council Core Strategy (2010)

- 4.2.13 Spatial Objective ECO 2 aims to diversify Forest Heath's economy to create a strong, competitive area which encourages sustainable business and improves the mix and quality of jobs.
- 4.2.14 Spatial Objective ENV 3 aims to promote a diverse range of renewable energy schemes whilst protecting landscapes and quality of life.

Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (2015)

- 4.2.15 Policy DM7 encourages the use of local materials, skills, and techniques in order to contribute to the local economy.

Fordham Neighbourhood Plan 2016-2036 (2018)

- 4.2.16 Objective 5 of the plan is to maintain, and wherever possible enhance, key community infrastructure and services, including the village's primary school and the local secondary school.

- 4.2.17 Objective 6 of the plan is to ensure that local businesses continue to be successful and wish to remain in Fordham. Village employers of note include tradesmen and companies providing services in a number of trades; engineering firms; and haulage and transportation firms.

Newmarket Neighbourhood Plan 2018-2031 (2020)

- 4.2.18 Community Action A6 aims to promote inward investment into the town to ensure that a diversity of employment opportunities is maintained, particularly in high-tech industries. It also aims to encourage a reputation for Science, Mathematics, and Computer Science, emphasising local successes in these fields.
- 4.2.19 Community Action B4 aims to enable and encourage the sustainable growth of widely advertised learning hubs in the community, promoting collaboration between councils, businesses, and voluntary groups. It also aims to encourage partnerships with Newmarket Academy, West Suffolk College, and other academic bodies to deliver courses for literacy, numeracy and skills for life, as well as adult education and the possibility of vocational and academic further education courses.

Transforming Suffolk: Suffolk Community Strategy 2008-2028 (2008)

- 4.2.20 The Suffolk Strategic Partnership (SSP) has prioritised achieving learning and skills in the top quartile in the country. By 2028, the SSP want Suffolk to have a workforce with the skills to meet the needs of Suffolk's economy and high aspirations, with opportunities to realise them through quality learning opportunities.
- 4.2.21 The priorities of West Suffolk Local Strategic Partnership (LSP) include encouraging achievement in children and young people and improving skills and educational opportunities.

4.3 Conclusion

- 4.3.1 Planning policies and economic development strategies relevant to the Scheme exist at the national, regional, and local levels.
- 4.3.2 The Local Energy East (LEE) Strategy covers the three Local Enterprise Partnership (LEP) areas, and addresses how to achieve clean economic growth and secure, local, affordable, low-carbon consumption.
- 4.3.3 The relevant Local Plans for the area identify renewable energy as a target sector and aim to promote opportunities for the local workforce and supply chain, attempting to promote high quality and diverse job opportunities and reduce out-commuting. The relevant neighbourhood plans for the area stress the need to protect and enhance community infrastructure and opportunities for local businesses. Promoting skills development is a common theme across all local and neighbourhood plans. The OSSCEP is therefore in accordance with planning policy and supports achievement of the aims which the relevant Local Plans identify relating to SSCE.

5 Opportunities

- 5.1 This section sets out potential activities which the Applicant could pursue as part of programme of work relating to SSCE.
- 5.1.1 The opportunities described here reflect the likely impacts of the Scheme and respond to the local context, as set out in previous chapters. They are an illustrative long-list, and will be modified, refined and agreed through development of a full SSCE plan, which will be secured via a Requirement included in the DCO for the Scheme. The SSCE plan will be subject to approval by the relevant planning authorities – West Suffolk Council and East Cambridgeshire District Council.
- 5.1.2 The full SSCE plan would include a reasonable endeavours commitment to maximise opportunities identified below and in Table 7-1, in consultation with the relevant planning authorities.

5.2 Skills

- 5.2.1 As set out in Table 2-5, a variety of skills and disciplines are required for the successful delivery of the Scheme. Interventions relating to relevant skills training and education could benefit local people while also promoting the supply of an appropriately skilled workforce to deliver the project.
- 5.2.2 The Applicant has already identified a number of stakeholders for potential skills and educational collaboration, and has made initial contact with many. This programme of engagement will be continued and expanded post DCO consent in order to identify priority interventions relating to skills and training for inclusion in the full SSCE plan. A list of potential stakeholders is presented in Table 5-1.

Table 5-1: Potential Stakeholders for Skills Collaboration

Stakeholder	Stakeholder Type	Contacted to Date?
Apprenticeships Suffolk	Facilitator	No
Cambridge Regional College	Training Institution	No
Cambridgeshire Community Fund	Facilitator	Yes
East Cambridgeshire District Council	Facilitator	Yes
East Coast College	Training Institution	No
East of England Energy Group	Facilitator	Yes
Local Primary Schools	Schools	No
Local Secondary Schools	Schools	No
Suffolk County Council	Facilitator	Yes
Suffolk New College	Training Institution	No
University of East Anglia	Training Institution	No
University of Suffolk	Training Institution	No
West Suffolk College	Training Institution	Yes
West Suffolk Council	Facilitator	No

Opportunity 1: Apprenticeships

- 5.2.3 Apprenticeships can help fulfil labour and skills requirements for employers in a cost-effective way, while also providing paid employment, training, and potential pathways into employment for apprentices.
- 5.2.4 Apprenticeships Suffolk aims to promote the growth of apprenticeships by supporting the engagement of all interested parties through information and guidance. Apprenticeship providers in the area include:
- a. West Suffolk College
 - b. East Coast College
 - c. Cambridge Regional College
 - d. Suffolk New College
 - e. University of Suffolk
 - f. University of East Anglia (UEA)
- 5.2.5 In developing the full SSCE plan, the Applicant will consider a programme to promote apprenticeships during the various phases of the Scheme. Apprenticeships Suffolk could be a useful point of contact to advise in this area. The Applicant has already engaged with West Suffolk College regarding opportunities for apprenticeships and work placements.
- 5.2.6 Improving provision, quality and uptake of apprenticeships in the energy sector aligns with the tri-LEP LEE strategy.

Opportunity 2: Other Workforce Training

- 5.2.7 The Applicant will also consider other interventions to support the training of employees and workers on the Scheme.
- 5.2.8 The intent would be to support the achievement of vocational qualifications (e.g. BTEC, City and Guilds, NVQ, HNC) at various levels which are relevant to the delivery of the Scheme.
- 5.2.9 Engagement with potential Tier 1 contractors and local training providers (for example, via a Sunnica Skills Forum organised and operated by the Applicant) could highlight gaps in the skills required to deliver the Scheme, and therefore identify specific courses which could be particularly relevant.
- 5.2.10 The Applicant intends to join the East of England Energy Group. This will provide access to their Skills for Energy (SfE) programme.

Opportunity 3: STEM Education and Careers

- 5.2.11 There is currently poor take-up of STEM subjects within schools and colleges, and the UK's workforce of engineers is aging⁷. This implies a potential shortage of

⁷ The UK Government's Industrial Strategy (2017) (Ref 19) stressed the need to address skills shortages in STEM subjects and disciplines.

the technical and professional skills required to deliver the Scheme and other large infrastructure projects in the future.

- 5.2.12 The tri-LEP LEE strategy also identifies skills fragilities in the renewable energy sector.
- 5.2.13 The Applicant will investigate the potential for a programme of activities which promote STEM education and careers. This could be targeted at primary school pupils, secondary school pupils, college students and / or other young people in the area.
- 5.2.14 Given the Scheme's timescale and phases, some of these target individuals could ultimately become part of the Scheme's workforce. However, the key aim should be to inform and inspire young people about STEM careers more generally.
- 5.2.15 Initiatives could include project staff volunteering to run interactive workshops or give talks. The first step would be engagement with local schools and relevant facilitators (e.g. the Local Authorities) to establish the need and design appropriate initiatives.
- 5.2.16 Site visits during the construction period could be an effective way to educate and inspire students. The Applicant will also consider establishing a 'project hub' or some kind of facility at one or all of the Sunnica Sites to provide space and resources to deliver STEM initiatives. Inspiration could be taken from Wilburton Solar Farm, also in East Cambridgeshire, where an amphitheatre was built to provide a destination and meeting point that could be used by local groups and school children as an outdoor classroom/meeting room, making the solar farm an educational resource for the local area.
- 5.2.17 The Applicant has already engaged with Cambridgeshire Community Fund regarding potential collaboration on skills development programmes.

5.3 Employment

- 5.3.1 The expected employment benefits of the Scheme are shown in Section 2.2. This section will discuss opportunities to maximise these employment benefits for local people and disadvantaged groups.

Opportunity 4: Local Recruitment

- 5.3.2 The Applicant will investigate measures to promote take up of jobs generated by the Scheme by local people.
- 5.3.3 The starting point will be engagement with Local Authorities and Job Centre Plus, in order to tap into existing local employment support networks. The local Job Centre Plus offices are identified in Table 5-2 below.
- 5.3.4 There may be community and voluntary sector groups which specialise in local recruitment, and placing job adverts with local private sector recruitment companies will also support this initiative.
- 5.3.5 The Applicant intends to join the East of England Energy Group. This will provide access to relevant job boards.

Table 5-2: Details of Local Job Brokerage Agencies

Organisation	Address	Contact Details
Mildenhall Jobcentre	Mildenhall Hub, Sheldrick Way, Mildenhall IP28 7JX	0800 169 0190 ⁸
Newmarket Jobcentre	Wellington St, Newmarket CB8 0WJ	
Ely Jobcentre	52 Market St, Ely, CB7 4LU	
Cambridge Jobcentre	Henry Giles House, 73-79 Chesterton Rd, Cambridge, CB4 3BQ	
Bury St Edmunds Jobcentre	St Andrew's House, St Andrew's St, Bury St Edmunds, P33 1TT	
Thetford Jobcentre	Breckland District Council Offices, St Nicholas St, Thetford, IP24 1BT	

- 5.3.6 It may be useful to locate relevant recruitment personnel and resources on-site once construction starts. For example, there could be a named Skills and Employment Manager at the site responsible for local outreach, and vacancies could be displayed at the site.

Opportunity 5: Maximising Diversity of the Workforce

- 5.3.7 The Applicant will introduce initiatives to maximise the diversity of the workforce. Groups which could be the target of this measure could include:
- workers of a certain gender, ethnicity or age (e.g. 16-24 year olds or older workers);
 - disadvantaged or under-represented groups, for example, long-term unemployed, ex-offenders or disabled people.
- 5.3.8 The most relevant target groups for this measure would be identified through consultation and research post-consent.
- 5.3.9 Measures could include:
- ensuring that jobs are communicated to target groups, including identifying and working with specialist job brokerage agencies; and
 - working with job support and training providers who operate programmes aimed at getting people into work (for example, young people who are Not in

⁸ Specific contact details for individual Jobcentres are not available.

Education, Employment or Training may require pre-employment, basic skills training and work placements).

- 5.3.10 Any measures adopted will comply with employment law.
- 5.3.11 It will be important to report on the demographic profile of applicants for new jobs and the workforce. This would likely involve regular reporting, for example on age, ethnicity, gender, and disability, with data to be collected through a voluntary survey.

5.4 Supply Chain

- 5.4.1 The Applicant will take measures to maximise benefits to local businesses from spending on goods and services during each phase of the Scheme.

Opportunity 6: Business networking and support

- 5.4.2 The Applicant will work with local partners to communicate opportunities for purchasing and contracts arising from the Scheme to local businesses.
- 5.4.3 This will include building on existing relationships with Suffolk Chamber of Commerce, Cambridgeshire Chamber of Commerce, and Orbis Energy, as well as identifying other potential partners including the Local Authorities.
- 5.4.4 Initiatives in this area align with the LEE strategy aim of building on existing supply chain initiatives.
- 5.4.5 Suffolk Chamber of Commerce can also help the Applicant arrange 'meet the buyer' events to reach out to potential suppliers to boost the local content within the Scheme.
- 5.4.6 Orbis Energy is a unit within Suffolk Council focused on promoting the interests of clean energy growth in the East of England Energy Zone which is broadly defined as Norfolk and Suffolk. Orbis can provide links to the local supply chain and help organise supply chain events. They can also help companies get involved in cross offers and capabilities within the Scheme.
- 5.4.7 The Applicant also intends to join the East of England Energy Group. This will allow for communication with other members and individuals interested in the energy sector in the region.

Opportunity 7: Procurement Strategy

- 5.4.8 The procurement strategy for the Scheme will also reflect the aim of maximising benefits to local businesses, balanced against ensuring competitive delivery of the Scheme.
- 5.4.9 As well as early engagement with potential contractors via supplier information days, contracting opportunities will be publicised so as to maximise local reach (for example, using social media and industry publications).
- 5.4.10 There may be opportunities to work with local partners in this regard – for example, Suffolk Chamber of Commerce is already running the Tier 2 – Tier 4 contractors procurement process for EDF Sizewell so that local businesses that

want to become part of the supply chain can be effectively identified and engaged. The Chamber of Commerce's Sizewell C Supply Chain Team is the first point of contact for business and agencies wishing to engage in the project. The website forms the central resource for all Suffolk businesses who wish to make the most of the opportunities arising out of the development.

5.4.11 The strategy will also include environmental and ethical procurement policies to seek to minimise potential environmental impacts associated with procurement of materials and equipment, whilst also safeguarding the human rights of those working within the supply chain of the Scheme.

5.4.12 Proposed environmental procurement policies include:

- engaging with suppliers to develop a proactive approach to environmental issues and deliver environmentally sustainable solutions where appropriate;
- working in partnership with and supporting suppliers to continually improve collective environmental performance where data is available, and it is appropriate to do so;
- identifying and reviewing environmental risk and impacts of the products and services being procured;
- considering whole life environmental costs prior to purchase where data is available, and it is appropriate to do so; and
- using and disposing of goods in an environmentally responsible way, including reducing, substituting, reusing and recycling as sustainable options.

5.4.13 Proposed ethical procurement policies include:

- any potential supplier must complete a modern slavery supplier due diligence questionnaire as part of the tender exercise;
- any potential supplier that meets the statutory requirements under the Modern Slavery Act 2015 to prepare a modern slavery statement;
- any potential supplier must have a modern slavery policy;
- any potential supplier must provide relevant employees with modern slavery training;
- any contract to be entered into with a potential supplier must include the following warranties:
 - the supplier has not been and is not engaged in any form of slavery;
 - the supplier pays its workers in compliance with applicable employment laws and minimum wage requirements;
 - the supplier will take reasonable steps to prevent slavery and human trafficking in connection with its business; and
- any contract to be entered into with a potential supplier must include:
 - a right of audit; and
 - a right of immediate termination in the event of any instances of slavery and human trafficking connected to the supplier.

6 Delivery

- 6.1.1 This section describes how the SSCE plan could be delivered, including potential roles, responsibilities and timelines.

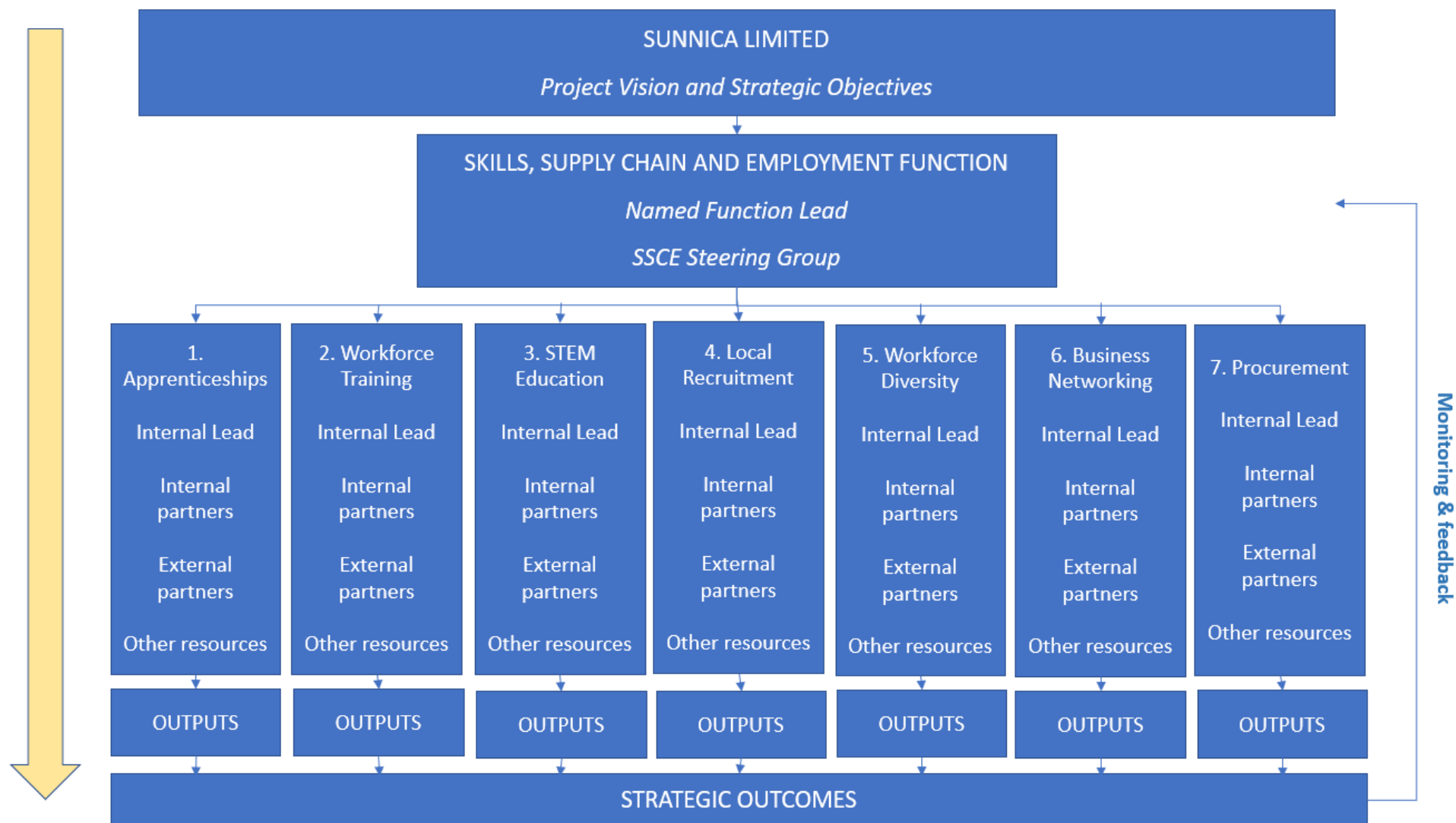
6.2 Organisational Framework

- 6.2.1 Figure 6-1 shows a potential organisational framework for developing and delivering the SSCE work programme post DCO consent.
- 6.2.2 The programme would be driven forward by a SSCE Function Lead, overseen and governed by a steering group which would include senior members of Sunnica Limited's management team.
- 6.2.3 The SSCE work programme would then break down into a number of activities or workstreams (some or all of which could align with the opportunities described in Section 5). Each activity would have a named lead (which could be the SSCE Function Lead), and internal partners (from within the Sunnica Limited project team) to support delivery. External partners and stakeholders (for example, Local Authorities, education and training providers, job brokerage agencies, Chambers of Commerce) could be engaged as appropriate, as their detailed local knowledge and experience will be critical to success. Additional resources such as professional support, capital funding or physical facilities may be relevant.
- 6.2.4 If successful, each activity will result in achievement of the outputs and, ultimately, the outcomes identified within the SSCE plan. A monitoring system will measure outputs and outcomes, and reporting will be undertaken. Lessons learned will be fed back in order to shape and improve SSCE work programme over time.

6.3 Internal Joint Working

- 6.3.1 Development and delivery of the SSCE work programme will require joint working between various parts of the Sunnica project team. Important internal partners will include the commercial team, the community engagement team, HR/personnel, and project/programme management.
- 6.3.2 There could be value in incorporating the SSCE work programme into a wider Sunnica community benefits or social value programme. This would allow all the benefits of the Scheme to be managed and measured in a coherent, effective and consistent way. Other benefits of the Scheme are described in the **Planning Statement [EN010106/APP/7.2]** and relate to access, biodiversity, heritage, soils and water quality.

Figure 6-1: Indicative Organisational Framework for Delivery



6.4 Engagement with External Stakeholders

- 6.4.1 Working with external stakeholders will be fundamental to the success of the SSCE programme.
- 6.4.2 An initial list of relevant partners is set out in Appendix 1. The Applicant has already made contact with a number of them, including training providers, local Chambers of Commerce and Local Authorities.
- 6.4.3 There may in addition be potential to engage with local residents and community groups on issues relating to SSCE, building on the consultation undertaken and during scheme development and preparation of the DCO.

6.5 Timelines

- 6.5.1 Table 6-1 sets out a timeline for developing and delivering the SSCE plan.

Table 6-1: Timelines for Developing and Delivering the SSCE Plan

Key Milestone	Actions
2021 – after DCO application submission	<ul style="list-style-type: none"> Continue to engage with local stakeholders to strengthen links and to identify preferred SSCE workstreams, using OSSCEP as a basis for discussion.
2023 – assuming consents granted	<ul style="list-style-type: none"> Develop OSSCEP into a full SSCE plan, confirming objectives and activities to be pursued. Discharge requirement in the DCO for the SSCE plan to be approved by the relevant planning authorities. Include SSCE requirements in the ITT for contractors, if/as relevant. Early SSCE activities in progress, e.g. networking and market information events to publicise opportunities to local businesses.
2023 – earliest start point for construction	<ul style="list-style-type: none"> Continue delivery of early SSCE activities, e.g. recruitment of apprentices and establishment of training and schools programme. Work with contractor(s) to plan how any SSEC requirements in contracts will be delivered and monitored during the construction period. Once construction has started, the SSCE activities and outputs should be fully in delivery.

- 6.5.2 It is suggested that once the full SSCE plan is finalised, the document is reviewed every six months, so it can be refined and adjusted as the Scheme moves towards its construction and operational phase.

7 Monitoring and Feedback

7.1 Monitoring

- 7.1.1 It is important that the objectives and activities of the SSCE plan are effectively monitored, measured and reported. This enables an understanding of whether the plan is achieving its goals and contributing to the over-arching vision, and provides feedback accordingly.
- 7.1.2 A monitoring and reporting plan will be developed as part of the full SSCE plan, this will include a periodic review with the Local Authorities. Due to the different opportunities presented during construction and operation the timing for these periodic reviews will be:
 - a. Construction – Quarterly
 - b. Operation – 6 monthly in the first year from the date of final commissioning, after which by agreement between the applicant and the Local Authorities.
- 7.1.3 Effective performance monitoring will be achieved by following the methods below:
 - a. Developing specific, measurable, attainable, realistic, and timely (SMART) performance indicators;
 - b. Aiming for quality over quantity of performance indicators;
 - c. Ensuring performance monitoring mechanisms are consistent with the stated objectives of the OSSCEP;
 - d. Ensuring performance indicators are flexible and updateable; and
 - e. Scoping out the practicality of how data will be collected before defining measurable targets.

7.2 Potential Outputs and Outcomes

- 7.2.1 Table 7-1 sets out some illustrative outputs or indicators which are relevant to the opportunities that the Scheme's SSCE plan will seek to achieve for the local area. Outputs are the tangible results of pursuing the specific opportunities of the Scheme.
- 7.2.2 Table 7-1 also sets out illustrative outcomes, which are the longer-term results of implementing the SSCE plan. They include changes to the local community, environment and workforce that the activities and initiatives aim to achieve. As per review timing set out at 7.1.2, the full SSCE plan will review industry best practice, relevant at the time of preparation, to tailor the outcomes for the Scheme, such as '5% club' for apprentices or 'disability confident employer' status.
- 7.2.3 All outcomes will be measured, using a methodology agreed with the relevant local authorities, and documented through evaluations undertaken at various intervals during the life of the Scheme. The full SSCE plan will also include a review/evaluation process in conjunction with the relevant local authorities.

- 7.2.4 The SSCE plan will be agreed in collaboration with the relevant local authorities, utilising the Skills Coordination function of the authorities. The Plan will be submitted and approved in advance of development commencing in accordance with Requirement 20 of the DCO.
- 7.2.5 The evaluation will be tailored to the agreed outcomes and outputs and could be conducted either internally or externally. The key questions the evaluation will seek to ask include the following:
- a. What has been achieved?
 - b. Have the specific outcomes been realised?
 - c. What would have happened anyway?
 - d. Was it value for money?
 - e. What lessons can be taken into other projects?
 - f. How will the lessons be communicated to the wider public (as the SSCE plan is a positive story)?
- 7.2.6 Reasonable endeavours will be made by the Applicant while delivering the actions in the full SSCE plan to maximise outputs and outcomes from the Scheme.
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Table 7-1: Potential Measurable Outputs and Outcomes of the SSCE Strategy

Opportunity Area	Opportunity	Potential Outputs	Potential Target/Provision	Potential Outcomes
Skills	Opportunity 1: Apprenticeships	<ul style="list-style-type: none"> Number of apprenticeships funded / taken-up 	<ul style="list-style-type: none"> Provide opportunities for 'local' apprentices through the creation of a minimum of 4 apprenticeships a year during the construction period of the Scheme. Provide the opportunity for 'local' operational apprentices with the creation of a minimum of 25 operational apprenticeships over the course of the operational phase. Provide work experience opportunities for local learners with a minimum commitment of two work experience opportunities per annum (each no less than two consecutive weeks in duration) offered by contractors/ developers during the construction period. Provide work experience opportunities for local learners during the operational period with a minimum commitment of two work experience opportunities per annum (each no less than two consecutive weeks in duration). 	<ul style="list-style-type: none"> Reduction in proportion of population with no qualifications
	Opportunity 2: Other Training	<ul style="list-style-type: none"> Number of relevant vocational qualifications achieved 	<ul style="list-style-type: none"> Provide opportunities for the employed workforce to upskill, supporting at least 25 'local' employees to attend training courses to attain new relevant technical or occupational skills, including national vocational qualifications over the 	<ul style="list-style-type: none"> Reduction in proportion of population with no qualifications

Opportunity Area	Opportunity	Potential Outputs	Potential Target/Provision	Potential Outcomes
			<p>duration of the construction period of the scheme.</p> <ul style="list-style-type: none"> Each operational role will be provided at least 6 formal training opportunities to support the acquisition of new skills and to attain new relevant technical or occupational skills, including national vocational qualifications, over the duration of the operational period of the Scheme. 	
	Opportunity 3: STEM Education and Careers	<ul style="list-style-type: none"> Number of schools engaged Number of events delivered Number of pupils participating in events Increased awareness of STEM careers 	<ul style="list-style-type: none"> Deliver at least one STEM workshop per year to year 6 students in primary schools that are identified as within the travel to work area (as defined in Section 2.2.3 above) a year, raising the awareness of STEM careers associated with low carbon energy production during the construction period of the Scheme. During the operational period engage with secondary schools and post 16 education establishments, identified as within the travel to work area (as defined in Section 2.2.3 above), raising the awareness of STEM careers associated with low carbon energy recording the number of pupils engaged. 	<ul style="list-style-type: none"> GCSE attainment in participating schools Take up of STEM subjects in FE
Employment	Opportunity 4: Local Recruitment	<ul style="list-style-type: none"> Proportion of workforce employed from the local area 	<ul style="list-style-type: none"> All job vacancies created on the project are advertised locally within the local area utilising local job centres and the Voluntary, Community and Social 	<ul style="list-style-type: none"> Increase employment levels in local area

Opportunity Area	Opportunity	Potential Outputs	Potential Target/Provision	Potential Outcomes
			<p>Enterprise (VCSE) sector to engage with local workers.</p> <ul style="list-style-type: none"> Engage with the Local Authorities skills coordination functions to understand local employment in defined 'legacy' roles. 	
	<p>Opportunity 5: Maximising Diversity of the Workforce</p>	<ul style="list-style-type: none"> Proportion of workforce employed for construction from target groups Number of employees who are happy with working environment/culture 	<ul style="list-style-type: none"> Provide opportunities to create pathways to employment for people who are previously unemployed or underrepresented groups. Creating a minimum of 5 jobs a year to be taken up by unemployed or underrepresented groups during the construction period. All contractors and operators will submit a workforce equality, diversity and inclusion (EDI) policy to cover all aspects of recruitment and employment. Work with a minimum of 2 job support and training providers who operate programmes within the travel to work area (as defined in Section 2.2.3 above) study area aimed at getting people into work, during both construction and operation, to maximise local employment opportunities. All contractors and operators must have achieved a minimum of a Level 2: Disability Confident Employer certificate. 	<ul style="list-style-type: none"> Increase employment levels for target groups

Opportunity Area	Opportunity	Potential Outputs	Potential Target/Provision	Potential Outcomes
Supply Chain	Opportunity 6: Business Networking and Support	<ul style="list-style-type: none"> Number of supplier events delivered 	<ul style="list-style-type: none"> Provide the opportunity for local companies and businesses to be involved by delivering a minimum of 2 supplier events for local businesses prior to the commencement of the construction period of the Scheme. 	<ul style="list-style-type: none"> Increase in turnover of local businesses
	Opportunity 7: Procurement Strategy	<ul style="list-style-type: none"> Proportion of contracts secured by local businesses 	<ul style="list-style-type: none"> All contracting opportunities will be made available for local businesses to tender for. 	<ul style="list-style-type: none"> Increase in turnover of local businesses

8 References

- Ref 1. Homes and Communities Agency (HCA), (2014); Additionality Guide: A Standard Approach to Assessing the Additional Effect of Projects: 4th Edition. HCA.
- Ref 2. Office of National Statistics (ONS), (2019); Business Register and Employment Survey. ONS.
- Ref 3. Office of National Statistics (ONS), (2016); Gross Value Added (Income Approach) 2015. ONS
- Ref 4. Office of National Statistics (ONS), (2019); Mid-Year Population Estimates 2018. ONS.
- Ref 5. Office of National Statistics (ONS), (2020); Annual Population Survey (January 2019-December 2019). ONS.
- Ref 6. Ministry of Housing, Community and Local Government (MHCLG), (2019); Indices of Multiple Deprivation. MHCLG.
- Ref 7. Office of National Statistics (ONS), (2015); Census 2011. ONS.
- Ref 8. Office of National Statistics (ONS), (2016); Gross Value Added (Income Approach) 2015. ONS
- Ref 9. Department of Energy and Climate Change, (2011); Overarching National Policy Statement for Energy (EN-1). London: The Stationery Office.
- Ref 10. Department for Business, Energy and Industrial Strategy, (2021); Draft Overarching National Policy Statement for Energy (EN-1).
- Ref 11. Ministry of Housing, Communities and Local Government (MHCLG), (2021); National Planning Policy Framework (NPPF).
- Ref 12. Local Energy East Network, (2018); Local Energy East Strategy
- Ref 13. East Cambridgeshire District Council (ECDC), (2015): East Cambridgeshire Local Plan
- Ref 14. Forest Heath District Council (FHDC), (2010): Forest Heath Core Strategy
- Ref 15. West Suffolk Council, (2015): Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document
- Ref 16. East Cambridgeshire District Council (ECDC), (2018): Fordham Neighbourhood Plan 2016-2036
- Ref 17. West Suffolk Council, (2020): Newmarket Neighbourhood Plan 2018-2031
- Ref 18. Suffolk Strategy Partnership (2008); Transforming Suffolk- Suffolk's Community Strategy (2008-2028).
- Ref 19. HM Government, (2017): Industrial Strategy: Building a Britain Fit for the Future

Appendix 1: List of Key Stakeholders

A.1.1.1 Partnership working will be crucial to achieving the objectives of the OSSCEP.

A.1.1.2 Table A-1 lists key stakeholders relevant to SSCE activities associated with the Scheme.

Table A-1: List of Key Stakeholders

Stakeholder	Stakeholder Type	Contacted to Date?
Apprenticeships Suffolk	Facilitator	No
Bury St Edmunds Jobcentre	Job Brokerage Agency	No
Cambridge Jobcentre	Job Brokerage Agency	No
Cambridge Regional College	Training Institution	No
Cambridgeshire & Peterborough LEP	Administrative Body	No
Cambridgeshire Chamber of Commerce	Facilitator	No
Cambridgeshire Community Fund	Facilitator	Yes
East Cambridgeshire District Council	Administrative Body	Yes
East Coast College	Training Institution	No
East of England Energy Group	Facilitator	Yes
Ely Jobcentre	Job Brokerage Agency	No
Local Energy East	Administrative Body	No
Local Primary Schools	Schools	No
Local Secondary Schools	Schools	No
Mildenhall Jobcentre	Job Brokerage Agency	No
New Anglia LEP	Administrative Body	No
Newmarket Jobcentre	Job Brokerage Agency	No
Orbis Energy	Facilitator	Yes
Suffolk Chamber of Commerce	Facilitator	Yes
Suffolk County Council	Administrative Body	Yes
Suffolk New College	Training Institution	No
Thetford Jobcentre	Job Brokerage Agency	No
University of East Anglia	Training Institution	No
University of Suffolk	Training Institution	No
West Suffolk College	Training Institution	Yes
West Suffolk Council	Administrative Body	No