

WRITTEN REPRESENTATION FOR SPR EA1N and EA2 PROJECTS (DEADLINE 1)

TOURISM & SOCIO-ECONOMIC ISSUES

Interested Party: SASES PINS Refs: 20024106 & 20024110

Date: 25 October 2020 **Issue:** 4

Summary

- The visitor economy of East Suffolk is at risk arising from the multiplicity of energy projects being considered for this relatively small area. The proposals along with the construction of Sizewell C and other energy projects pose a severe threat to the local 'green' economy which is a magnet both for visitors and current and future residents seeking respite from growing urbanisation elsewhere.
- 2. There are minimal local job opportunities during the construction phase of EA1N and EA2 and none post construction to offset the potential loss of jobs in the local tourism/service sector.
- 3. To date there is little evidence of meaningful skills training and enhancement despite a Skills Strategy being agreed with Suffolk County Council in 2015. A proposed MOU is not legally binding and furthermore there is no evidence of proper funding or targets being set.
- 4. There will be no perceived benefit to local services or infrastructure instead considerable additional strain on the road network and environmental harm.
- 5. There are considerable implications for the wider East Suffolk economy in the efficient allocation of the elements of capital natural (destructive); investment (prioritisation); human and social (disruptive and dilutive) and how to maintain a balanced local economy. Scottish Power has not fully assessed the impacts of EA1N or EA2 (and the cumulative impact of all the proposed offshore projects and Sizewell C) in the context of the East Suffolk economy.
- 6. The socio-economic analysis conducted by Scottish Power is poor and incomplete. In particular it has not:
 - a. engaged with the Report commissioned by the Suffolk Coast Destination Management Organisation (ref one – executive summary, ref 2 - full report), it seems to refer to rely upon TripAdvisor analysis;
 - analysed the effect on inward investment, people who choose to move here in later life for its peace and tranquillity having spent their working life in other parts of the UK or the world;
 - c. fully addressed the impact on the East Suffolk economy.

- 7. The evidence to date indicates that these projects will only be damaging to the local economy and there is no meaningful offset in terms of long-term jobs or long term skills and training enhancement.
- 8. Accordingly we believe the applications are deficient in respect of socio-economic impacts and contrary to section 5.12 of EN-1.
- 9. Further given the statistics and conflicting statements of economic benefits it would be of assistance if a truly independent and objective expert report was put together of the socioeconomic impacts on the local economy of these projects, Sizewell C and the other energy projects which are planned for this area.

Overview Of The East Suffolk Economy

- 10. Section 5.12.4 of the Overarching National Policy Statement for Energy (EN1) requires an examination of the socio-economic conditions in the areas surrounding the proposed development. We have sought to measure the proposals against the perceived economic strengths and the social needs; to ensure the proposals do not upset the balance and efficient allocation of resources (the various components of capital) and balance the demands of economic growth, social fabric and preserving a vital national and local amenity. As background, we show at Appendix 1 East Suffolk Council Employment and GVA (Gross Value Added) by sector. The figures show a substantial, diverse and dynamic local economy although there are known pockets of deprivation.
- 11. We do not consider that the applicant has properly assessed the existing socio-economic conditions in East Suffolk and certainly not the individual characteristics of the area most affected by the proposals. Those characteristics include the following.
 - The economy, employment and prosperity have expanded on the diversity of the economic drivers so it is not reliant on any one sector and a high proportion have growth potential.
 - Reflecting the characteristics of the coastline, they also tend to be concentrated in clusters.
 - Digital technology and the BT Adastral Park at Martlesham/Ipswich. East Suffolk Council (ESC) has a close strategic alliance with the Ipswich Strategic Planning Area.
 - Ports and transportation (Felixstowe, Ipswich and Lowestoft).
 - Agriculture (Central and coastal areas)
 - Real Estate derived from expanding commercial opportunities and residential developments.
 - Retail and business Parks (Martlesham, Felixstowe, Rendlesham, Lowestoft).
 - Tourism and Visitor Economy. There are two distinctive but complementary areas. The coast between Woodbridge and Southwold for rural recreation; north of Southwold to Lowestoft for family holiday parks and attractions/activities.

The Creation Of Jobs And Training Opportunities

- 12. We are supportive of the opportunities for Lowestoft and it becoming a local support centre for servicing the offshore elements of these projects, albeit they do not appear substantial when considered in the terms of the overall multi billion pound investment budget of these projects. Furthermore many of the publicised investments do not merely serve a single project but many of the projects already developed or proposed to be developed. There is a complete lack of clarity in this regard.
- 13. Scottish Power assess the magnitude of peak employment onshore of 243-249 (say 250) during a construction period of three years. This is a civil engineering project so it is unlikely that many will be sourced from the immediate area. Instead it is estimated that just 36%, 90 jobs are described as 'resident' sourced from East Suffolk, Ipswich, Lowestoft and Great Yarmouth areas, some 60 minutes' drive away. The remainder will be sourced from the wider NALEP area 120 jobs, 48% and 40 jobs (16%) In broad terms the benefit impact on jobs is at best minimal during the construction phase.
- 14. In the operational phase, it is acknowledged that there will be no full-time jobs.

- 15. **Skills and Training Enhancement (C30.3.33.1)** We appreciate the desire expressed in the Memorandum of Understanding (MoU) to maximise the training and re-skilling opportunities arising from the projects; but these mostly relate to the manufacturing and supply chains of the offshore facilities. We consider these should be quantified and judged proportionately. Much of the supply chain including infrastructure manufacturing will be outside the East Suffolk / NALEP area. So, just as we question the employment benefits, the training and development opportunities should be assessed against the wider investment opportunities reflected in the strength and diversity of the wider East Suffolk economy.
- 16. Scottish Power refers (section 30.3 .3 .12 skills and training enhancement) and the MOU with Suffolk County Council. However despite this being in place since 2015 there no evidence that this enhancement has developed anything meaningful when set against the potential risk to the visitor economy.
- 17. In June 2020 Scottish power launched an apprenticeship programme in Lowestoft. However this programme amounted to the employment of a mere two apprentices.....the text below is an article from the Lowestoft Journal (22 June 2020) under the headline

"Fantastic opportunities' as new apprenticeships are unveiled"

"Scottish Power Renewables is seeking people with a passion for science, maths, engineering, problem solving and those with good communication skills and a strong team ethic to serve as mechatronics maintenance apprentice technicians on the windfarm being developed 30 miles off the Suffolk coast.

Based at East Coast College Lowestoft campus, <u>the **two** long-term</u> apprenticeships are open to those with four GCSEs A-C/4-9 grades in English, Maths and Science."

18. The experience in Scotland should also be noted where the development of offshore wind has not delivered what was expected - see Appendix 3.

The Provision Of Additional Local Services And Improvements To Local Infrastructure

19. The developer proposes alterations to the local transport routes which will diminish the characteristics of the area and they underestimate the scale of transportation impacts -see Written Representation concerning Transport & Traffic.

Effects On Tourism & Cumulative Impact

20. Visitors tend to have common interests in the area with those of residents. Seeking peace and tranquillity there is a substantial cottage self-catering and bed and breakfast sector. There is a growing mix of small-scale caravan/holiday home sites with on-site facilities spread across the area. These are in addition to more traditional hotels found in Aldeburgh and Southwold. The accommodation sector is especially fragmented in the area with primarily private and individual ownerships. Accordingly, meaningful statistics are difficult to find.

- 21. Many do not advertise as they have repeat visitors and there is a pool of those providing accommodation for visiting artists and students to Snape Maltings. Overall, there are limits to expansion in the immediate area, not least to preserve the environment.
- 22. Its proximity to major urban areas makes it a favourite destination for day and short-term visitors and these characterise most of all the tourism/visitor sector.
- 23. In assessing the potential impacts on tourism, we have drawn on three reports.
- I Economic Impact of Tourism, East Suffolk 2018 by Destination Research Ltd

Headline Figures are shown at Appendix 2

Key figures:

- Total number of trips (day and staying) 12,700,	000 of which
- Total staying trips 686,	,000
- Total day trips 12,014	,000
- Total Tourism Value £671,710,	,000
- Full time equivalent jobs 10	,446
- Total actual tourism related employment 14	,153

II - Energy Impact on Suffolk Coast 2019, commissioned by the Suffolk Coast Destination Management Organisation (DMO)

https://www.thesuffolkcoast.co.uk/shares/The-Energy-Coast-BVA-BDRC-Executive-Summary-2019.pdf

24. The key findings of this report:

- The combination of the construction of Sizewell C and SPR infrastructure is found to deter some 64% on visiting intentions which could cost the tourism sector at least £24million pa
- During construction the net loss of natural landscapes, tranquillity, nature and the region's unique charms are the concerns most likely to deter visitors
- 58% of businesses expected annual turnover to decrease during the construction period, the majority expecting a fall of at least 20% and 23% annual decreases of more than 50%. Accommodation providers felt particularly vulnerable.
- Projecting the core analysis further, it is estimated that at least 400 full time equivalent local jobs are at risk.
- Consideration for holidays during infrastructure development falls 21%; for days out by 9%.
- Nature related reasons are the main motivations for those considering visiting the Suffolk Coast in future.
- Significant investment will be required to ensure the Suffolk Coast brand is not dominated by energy and that the region does not fall further behind the regional competition.

- 25. The same report identifies opportunities to develop tourism in the region in order of desirability:
 - Specialist interest tours in natural areas of beauty and wildlife.
 - More public transport links between main tourist towns and villages.
 - Detailed on-line guides and apps for independent exploration
 - Being able to see high quality art and culture.
 - Development of cycling offer
 - More opportunities to participate in learning or hands-on activities
 - More spas / wellness retreats.
 - More indoor family attractions
- 26. It is important to note that this research took into account only the EDF Energy Sizewell C nuclear power station and SPR's planned construction. Accordingly it does not consider the cumulative impacts of the six additional projects in the pipeline which involve further cable entry points along the fragile coast, cable corridors and haul roads which will add further disruption and scarring of the landscape over a period of up to ten years and being further deterrents to tourism when the sector needs reassurance to recover from the impact of the Covid-19 pandemic.

III - Covid-19 - Online Tourism Business Survey - May 2020 prepared for East Suffolk Council

This survey is relevant since

- it highlights the fragmented and fragile structure of the tourism economy the majority of businesses are self-employed, sole-traders and micro businesses.
- Two in five businesses are unlikely to survive should restrictions remain until the end of 2020.
- Half of businesses would need up to three months to get back to normal levels with a quarter requiring between six and twelve months or even longer.
- Crucially, seven in ten believe that promoting the area would build consumer confidence.

Conclusion in relation to Tourism and Cumulative Impact

- 27. Scottish Power has failed to assess in detail the tourism sector, least of all address the issues contained in the DMO Report. Instead, it has relied on desk-based research drawn from Trip Advisor reviews of hotels and holiday lets etc. (S 6.1.30) Other than highlighting the quality of these properties, it is not very meaningful. It fails to recognise that visitors come to the area to enjoy its sensory attributes and seek properties across the area which offer seclusion, peace and tranquillity. They form bases for wider exploration by walking and cycling. It further explains the fragmented structure of the sector.
- 28. In sum, we disagree with Scottish Power's conclusions concerning socio-economic impacts and this is the result of a defective assessment contrary to Section 5.12 of EN-1.

The Impact Of A Changing Influx Of Workers

29. Other than they are hardly going to be popular digging up and destroying our environment, the relatively small numbers are not thought to have much of an impact.

30. In this area the Sizewell C is a major source of worry with a projected work force of up to 8,500 and extending over a 9-12-year project lifespan and where the implications are substantial.

Loss Of Inward Investment

- 31. The flow of inward personal and business investment is substantial being based on the area being an attractive place to live and visit. This is attributable to the environmental attributes of open spaces for peace and tranquillity and the diversity of recreational and cultural activities.
- 32. Traditionally this area has been and continues to be attractive to retirees they come armed with their accumulated financial resources, professional skills and experience which they then apply to their preferred pursuits and often that involves physical and financial voluntary contributions to local organisations and institutions.
- 33. Second-home owners, most of whom are anticipating retirement but increasingly also seeking investment for holiday rentals. They have an interest in preserving the characteristics of the area.
- 34. Increasingly in the current Covid-19 pandemic, there is renewed interest by younger members of society in establishing services and businesses in rural environments like Friston. This is the result of an upturn in homeworking and decreasing reliance on commuting to large towns and cities. This interest is important because it renews an ageing population and provides for sustaining the social fabric of the community. Friston enjoys a moderately fast broadband which facilitates homeworking. Accordingly, activity such as that proposed by Scottish Power risks driving such renewal away.
- 35. The investment comes in many forms:
 - purchase of properties
 - usually accompanied by refurbishment
 - followed by property and household maintenance.
 - Capital projects financed by a mix of grants and local fundraising, such as libraries, community centres and recreational facilities. The regeneration of the Snape Maltings complex has had a substantial impact on the economy. A further major expansion of its facilities is on hold during the Covid-19 pandemic.
 - The introduction of niche and high-end retail brands in the High Streets of certain areas, notably Woodbridge, Aldeburgh and Southwold.
 - The DMO Report discussed above identifies wide-ranging investment opportunities in the visitor economy.
 - Housing developments.
- 36. Owing to limits on the supply of labour locally, many of the contractors for the larger projects are drawn from the same Economic Study Area (i.e. within 60 minutes' drive) as that of the SPR development.
- 37. However, that still leaves a very strong demand for local labour artisans with specialist skills in the property maintenance trades (plumbers, electricians, joiners, small builders, garden maintenance). Also, for the care sector and service economy.
- 38. These are all key drivers of the local economy not to be disrupted by the introduction of capital-intensive projects and the disfigurement of the valuable landscape.

39. A Scottish Power has carried out no assessment of the impact of the projects on this part of the local economy.

EAST SUFFOLK ECONOMY – AIMING FOR A BALANCE

In this section we have tried to bring together all the socio-economic issues to gain a wider perspective and identify priorities for the better allocation of resources.

Natural Capital

For this specific project the main geographical area is relatively small if you define its Southern boundary as the junction of the A12 / A1094 at Friday Street (the latter is considered to be the first and main entry point to the area and is a direct route through Snape and then to Aldeburgh) and at the North, the Sizewell Power Stations' complex.

The protection of this area is considered key to maintaining the Government's policy objectives to preserve 'green' spaces for public health and wellbeing.

The areas of the coast have unique characteristics derived from the changing coastline; the river inlets and developments. The development of this area has been managed to preserve its sense of history and character. The webs of roads, lanes, footpaths and villages are derived from the historic agricultural and seafaring links of the past.

The terrain is one of seascapes, landscapes and skies (day and night!). It encompasses substantial areas of Outstanding Natural Beauty, Special Scientific Interest and Special Interest.

The area(s) have been further preserved and protected by the main A12 link road between lpswich and Lowestoft being some 4-5 miles inland.

There are no major centres of population within the small area:

- Seaside town of Aldeburgh, population 4,967
- Market town of Leiston (retaining aspects of its industrial past), population 6,397
- Market town of Saxmundham, population 6,161.

Arguably, Aldeburgh has very limited capacity to expand, whereas Leiston and Saxmundham are seen as towns which are 'struggling' and where the retail sector is under pressure in the East Suffolk Business Plan. Since these are the closest towns to Sizewell, it rather begs the question of the economic benefits of energy projects.

Within the remaining area there are some 20+ villages and hamlets with their own individual characteristics and communities.

There is an overriding sense of peace and tranquillity.

These qualities have made the area a most desirable place in which to live and to visit.

Its appeal is to those who enjoy the 'great outdoors'

- Conservation
- Flora, fauna, ornithology
- Recreational pursuits Sailing, cycling, walking, golf, swimming.
- The land and seascapes and associated peace and tranquillity have been, and remain, a source of inspiration to artists and musicians. The most renowned cultural figure is the late Benjamin Britten who drew his own inspiration from living in the area and founded the Aldeburgh Music of the Arts and Music and then

- Snape Maltings Concert Hall which has since developed into a year-round international centre for music and the arts. It now comprises two concert halls (830 and 350 seat capacities); recital and study studios and accommodation for artists and students; an extensive educational and community support programmes. These are further supported by a complex of hospitality venues and shops. Over the years a development of residential apartments has enabled the site to become a destination with a living feel surrounded by incredible vistas.
- Not least the area still has its specific industries of agriculture, admittedly much mechanised now and traditional methods of fishing off the coast's beaches.

Human Capital

The demographics have changed over the years as employment has declined in agriculture with greater mechanisation and also in engineering. Fishing has declined as 'factory' and trawler fishing have expanded. They remain though, as key components of the local economy.

However, the major force has been the attraction of the area for those seeking a 'rural escape' from the pressures of city and town work and life. This has become increasingly important with the growing urbanisation spreading northwards up the coast from Colchester and driven by the expanding commercial activities and the need for housing.

That explains the growth of retirees – some 65% of the local population are over 65 – and those acquiring weekend/holiday second homes.

They tend to be of a mature age, affluent and possessing professional skills which they bring to the area.

The same factors attract visitors to the area and this has led to a substantial service economy for the community and visitors.

The growth of the ageing population is expected to continue but the area retains its attractions and second home owners retire and move to put down their roots.

This is not God's waiting room. A substantial proportion are economically active as they seek to participate, support and defend the very aspects of life they have come to appreciate. They come with their individual skills and accumulated experience to voluntarily support:

- Local institutions Town and Parish Councils; Churches and religious organisations.
- Environmental Bodies The Alde & Ore Trust; Suffolk Wildlife Trust; Suffolk Preservation Society; RSPB Reserves.
- Health and Social Care Sector Hospital Trusts; Residential and Nursing Homes; St Elizabeth Hospice; East Anglian Childrens' Hospices; The Warden's Trust at Thorpeness; Coastal Accessible Transport Services.
- Cultural Snape Maltings complex is supported by a core of volunteers in some support functions. It is also a catalyst for sustaining and developing existing and new activities in the music and arts. There are now year-round festivals and events – Literary, Poetry, FolkEast, Food and Drink; Documentary Film utilising local venues such Aldeburgh Jubilee Hall, Community Centre and Cinema, Saxmundham Town Hall and Leiston Film Theatre.

All these areas have continued to expand, and the immediate aims are now to ensure they survive the Covid-19 lockdown and rebuild their operations and revive their vitality.

Supporting this is a substantial service economy providing essential services for the hospitality sector and property repair and maintenance for residents. These tend to be fragmented – no major employers or central marketing operations so, numbers are difficult to obtain other than to point to the low level of unemployment and anecdotal evidence indicating shortages of skills in property maintenance, horticulture and agriculture.

There also appear to be strains in the provision of local services – GP surgeries, social care and infrastructure, albeit they may be a consequence of budgetary restrictions.

Social Capital

The area profile this far indicates the strength of social capital. Accordingly, there are major concerns as to how the energy projects will undermine and dilute this to the detriment of prosperity and wellbeing.

Social capital links with human capital and is seen as a private and public good for the people – civic participation, church-going, volunteering and social connectivity.

Social fabric is considered strong in this area with high levels of participation in local institutions and activities. Recent research shows that those over 65 are more likely to increase their participation in civic participation and volunteering – that such work offers an alternative form of community and belonging.

The area covered by the former Suffolk Coastal District Council also scores highly in the top two quartiles where location and education opportunities contribute to higher social mobility and to higher levels of earnings. These in turn help to reduce inequalities and deprivation.

Investment Capital

The abiding attractions of the area drive inward investment most characterised by the expansion of housing developments in Saxmundham, Leiston and Woodbridge. Saxmundham is planned to create a new 'garden village' development of 800 homes; 400 homes at Woodbridge and there are smaller scale developments at individual villages.

Infill housing prevails in Aldeburgh.

Average house prices tend to be higher than the national average and whilst the property market seems to be maintained with a reasonably high turnover there is the continuing investment in refurbishment and maintenance as properties change hands.

Snape Maltings (Britten Pears Arts) has further plans for expansion of its artistic, residential and commercial activities at its site.

Tourism is examined in more detail in S?, but continues to attract investment as providers seek to upgrade their facilities in response to increased demands for availability and quality.

CONCLUSIONS IN RESPECT OF EAST SUFFOLK ECONOMY

The accumulation of energy projects which are invariably NSIPs will cause, indeed is already creating, major disruption and distortion of the East Suffolk economy. As NSIPs ultimate decisions are taken away from the Local Authorities and cut across their own Local Plans.

Their numbers and the prolonged construction periods will destroy the attractions of the area for those living here, newcomers and visitors. Accordingly the new energy projects detract from the strengths and exacerbate the weaknesses. They are capital projects better suited to where there are readily available facilities of brownfield land and labour and closer to the much-vaunted supply chains. That in turn reduces local congestion and emissions.

Coming out of the consequences of Covid-19, the true opportunities lie in building on the inherent strengths of the area:

- The appeal of rural life
- Preserving and enhancing its characteristics; its environment and facilities
- Improving the diversity and quality of the hospitality and tourism 'product'.
- Building on the expansion of cultural activities, not least Britten Pears Arts (Snape Maltings) and local festivals.
- Developing better transport links. (The single-track parts of the East Suffolk Line affect adversely the reliability and appeal of its operation) and co-ordinating that with bus links.
- Greater availability of public parking in town centres and areas of special interest.
- Improved educational facilities closer to main areas of population to provide greater accessibility and for advanced education and skills beneficial to the opportunities within the area.

These issues need to be addressed by Scottish Power.

Industry/sector	Employee Jobs (2018)	%	GVA (2018, £ millions)	%
ABDE: Agriculture, mining, electricity, gas, water and waste	-	•	333	7
B: Mining and quarrying	50	0.1	12	-
C: Manufacturing	10,000	11.2	463	9
D: Electricity, gas, steam and air conditioning supply	800	0.9	-	
E: Water supply; sewerage, waste management and remediation activities	1,000	1.1		70
F: Construction	4,000	4.5	343	7
G: Wholesale and retail trade; repair of motor vehicles and motorcycles	15,000	16.9	448	9
H: Transportation and storage	10,000	11.2	650	13
I: Accommodation and food service activities	9,000	10.1	229	5
J: Information and communication	4,000	4.5	532	10
K: Financial and insurance activities	800	0.9	47	1
L: Real estate activities	900	1.0	718	14
M: Professional, scientific and technical activities	6,000	6.7	131	3
N: Administrative and support service activities	4,000	4.5	199	4
O: Public administration and defence; compulsory social security	3,500	3.9	266	5
P: Education	8,000	9.0	314	6
Q: Human health and social work activities	9,000	10.1	263	5
R: Arts, entertainment and recreation	2,500	2.8	59	1
S: Other service activities	1,500	1.7	50	1
T: Activities of households	-	-	37	1

Employment & GVA by Sector in East Suffolk

Source of employment data: ONS Business Register and Employment Survey via Nomis https://www.nomisweb.co.uk/reports/Imp/la/1820328121/report.aspx

Source of GVA data: Office for National Statistics

https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueadded balancedlocalauthoritiesbynuts1region

APPENDIX 2



APPENDIX 3

THE RECORD IN SCOTLAND

A recent update on jobs in the Scottish wind energy sector:

Scottish wind has created just 6% of the 28,000 jobs forecasted by 2020. Official figures released this year by ONS (Office for National Statistics) show just over 1,700 full time jobs have been created to date. Updated forecasts predict only 6,000 full time jobs will be created in the Scottish sector by 2030. (source: Martin Williams - Scottish Herald 20/02/2020, figures from ONS updated February 2020). 6,000 jobs by 2030 is only about 1/5 of the jobs the industry had originally forecasted.

The actual figures are so poor that Unite & GMB unions has described the low number of jobs and awards of manufacturing contacts to overseas companies as the "RENEWABLES SCANDAL" _(source: GMB Calls For Subsidy Reform Amid Reports Of More Renewables Manufacturing Misery - gmbscotland.org.uk 27/05/2020)

Similarly looking at supply chains, UK companies and workers are not benefitting as hoped. We are told UK supply chains will benefit by £100s millions however CS Wind in Campbeltown, a manufacturer of key components for wind farms has recently shed the majority of its UK workforce after its Korean parent decided to manufacture most items in Korea & Vietnam. CS Wind received in excess of £3m of money from publicly funded investment & grants in recent years, the company employed 482 staff in 2015, it made pre-tax profits of £7.1 million in 2018. By 2020 the workforce at its UK factory had reduced to around 6 employee https://www.thesuffolkcoast.co.uk/shares/The-Energy-Coast-BVA-BDRC-Final-Report-2019.pdf s. (source: Martin Williams – _Scottish Herald 25/08/2020).