

FOSSE GREEN ENERGY EXAMINATION

DEADLINE 5 SUBMISSION - ASSESSMENT OF VISITOR ECONOMY IMPACT

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1. Introduction

I write to respond to the applicant's responses in document REP4-018 to my Deadline 3 submission on the impact of FGE on the Visitor Economy (REP3-086).

To restate my credentials for giving an expert opinion on this issue, I was for over 20 years one of the leading tourism consultants in the UK, with a specialism in assessing the potential for visitor accommodation development in destinations across the country. I have been involved in supporting the development of Lincolnshire's visitor economy for over 30 years, firstly in my role as the Regional Tourism Development Manager for the East Midlands Tourist Board, and then as a tourism consultant, undertaking numerous tourism strategy, research and consultancy assignments for Lincolnshire County Council, Lincolnshire Tourism and the Greater Lincolnshire Local Enterprise Partnership. I also have expertise on walking and cycling tourism. I believe therefore that I have the experience and knowledge to act as an expert witness on the likely impact of the FGE project on the Visitor Economy of the surrounding area.

2. Type and Cost of Accommodation Used by Contractors

I do not accept the applicant's contention that FGE construction contractors will use higher quality hotels. From my experience of over 30 years of interviewing the general managers of higher quality hotels across the UK, I have never found that such hotels cater for construction contractors. This is a market that I have found to only ever be accommodated by budget and mid-market hotels. It is misleading to suggest that FGE construction workers might be accommodated in hotels such as the White Hart, Charlotte House and Doubletree by Hilton in Lincoln. The hotel supply that will realistically be available to FGE construction workers is thus lower than suggested by the applicant in the ES.

3. Weekly Hotel Demand Patterns and the Lincoln Hotel Market

The applicant discounts my 2017 study of the Lincoln Hotel Market as '*historic*', '*qualitative*' and '*anecdotal*'. While I acknowledge that it is historic, it was based on a robust survey of Lincoln hotel managers and published hotel performance data for Lincoln, to provide an in-depth quantitative analysis of hotel performance and demand patterns. My findings show very similar hotel occupancy levels to those reported by the applicant in the ES, indicating that the Lincoln hotel market has changed little since 2017.

The key point that I make in REP3-086 is that the applicant fails to take account of the weekly patterns of demand for hotel accommodation in the 30-minute drive time radius of the FGE site to support their claim that FGE construction workers can be fully accommodated in existing hotels. The applicant only provides monthly hotel room occupancy data, and no figures or room occupancy averages by day of the week. The monthly hotel room occupancy levels that are reported in the ES are above 75% for most months and above 80% for the summer months. In my experience hotel room occupancies at such levels indicate that hotels will be consistently fully booked and turning business away on Tuesday and Wednesday nights, and also frequently on Monday nights and Saturday nights. These are the peak demand nights for hotels. Sunday night occupancies are usually very low, and hotels rarely achieve high occupancies on Thursday and Friday night. In order to achieve an

average weekly room occupancy of 75%, hotels will need to be trading at 90-100% occupancy on Monday, Tuesday, Wednesday and Saturday nights.

I maintain therefore that the applicant's contention that FGE construction worker demand for hotel accommodation can be met by the area's existing hotel supply without displacement of demand from other markets is fundamentally flawed and should be discounted by the ExA in the assessment of FGE on the area's visitor economy. It will certainly not be a positive benefit from FGE and is more likely to represent a negative impact in terms of the displacement of other visitor markets, such as business visitors and overseas tourists, that use the area's hotels and will generally spend more in the local area.

4. The Impact on Non-Serviced Accommodation

The applicant's response to my comments on the potential impact of FGE on the non-serviced accommodation businesses in the areas immediately surrounding the FEG site focuses purely on the direct impact of FGE on these businesses in terms of the visual, air quality, noise and transport impacts of FGE on such receptors. The point that I make is that these businesses trade very much on their countryside location, as evidenced by the quotes from their websites and my experience of interviewing similar businesses over many years of working as a tourism consultant. LCC and NKDC clearly conclude that the visual impact of FGE on the landscape and rural character of the area will be significant. The applicant also accepts in the ES that FGE will have an impact on the countryside. It is therefore reasonable to contend that the non-serviced accommodation businesses in the surrounding area that rely heavily on their countryside setting as a key part of their market appeal could well lose business and cease future investment as a result of the degradation of their surrounding countryside that result if FGE goes ahead. I cannot provide evidence to support and quantify this opinion, but would point out that the applicant provides no evidence to support its opinion that *'visitor bookings, trading performance, future investment potential or long-term business viability will be unaffected for these businesses'*.

The applicant only references a discussion with Cathedral View Holiday Park. I have also spoken to this business. From my discussions with the owner, I would agree that it will not be impacted by FGE. Cathedral View Holiday Park is very different to the area's other non-serviced accommodation businesses. It comprises purely privately owned holiday homes and has fully sold all of its plots. It does not therefore rely on the short break, leisure and holiday visitors that are choosing other types of non-serviced accommodation to use as a base for enjoying the countryside and visiting the area.

There is no evidence that the applicant has spoken directly with any other non-serviced accommodation businesses in the area to gain an understanding of how they think they could be affected by the change to their countryside setting. The applicant provides no evidence to support its contention that *'a change to the surrounding landscape does not, in itself, equate to a significant adverse socio-economic effect or a threat to business viability'*. When the area's non-serviced accommodation businesses are so clearly trading on their rural setting and access to countryside, nature and wildlife, the degradation of their surrounding countryside that it is agreed will result from FGE must surely have some negative impact on these businesses. I cannot tell you how significant the impact could be, but I believe that the very threat of a negative impact should be taken into account by the ExA when considering the potential impact of FGE on the Visitor Economy.

The applicant dismisses my submission on the impact of FGE on non-serviced accommodation as *'relying on general professional experience and inferred customer behaviour, rather than site specific engagement or quantitative evidence'*. My evidence draws on over 30 years of experience of researching and understanding the non-serviced visitor accommodation sector. I do not believe that this can be characterised as 'general'

experience. I am an 'expert' in this field. I accept that I have not undertaken any site-specific research or provided any quantitative data to support my opinion, but neither has the applicant. They merely provide a counter opinion, which is not supported by any evidence or professional expertise on the non-serviced accommodation sector.

The applicant's contention that similar conclusions on the impacts of the Gate Burton Energy Park and Tillbridge Solar Project on visitor accommodation, including non-serviced accommodation, means nothing without a detailed assessment of the robustness of the evidence and expert opinion that was submitted by the applicants for these projects, and IP responses on this issue. The applicant provides no analysis to support its contention on this matter. I do not believe that it is a valid approach for the applicant to attempt to claim that FGE will not impact non-serviced accommodation in the areas that surround it simply because this was the conclusion for the Gate Burton and Tillbridge projects.

In conclusion, it is clear that neither I nor the applicant can say with certainty how far FGE will impact that area's non-serviced accommodation businesses. However, I believe that even the potential threat to such businesses should be a consideration for the ExA when considering the impact of FGE on the Visitor Economy.

5. The Impact on Future Investment in Visitor Accommodation

The applicant dismisses my concerns that FGE may deter future investment in visitor accommodation in the areas immediately surrounding the FGE site on the basis that these concerns are '*speculative and hypothetical*'. The applicant acknowledges however that '*rural setting and landscape character can influence investment decisions in visitor accommodation*'. I have provided evidence of existing non-serviced accommodation businesses in the area trading very much on their rural location and access to nearby countryside nature and wildlife as their key selling points. The supply of such accommodation has gradually been increasing in the area, and in my professional opinion I believe that there is potential for additional visitor accommodation in the area in the future. LCC and NKDC (and to a lesser extent the applicant) agree that FGE will have a detrimental impact on the landscape and rural character of the surrounding area. It is reasonable to assume therefore that future investment in visitor accommodation that relies on a rural setting to attract customers is likely to be deterred if FGE goes ahead. I maintain that the ES has not demonstrated that such investment will not be deterred by FGE.

6. The Impact on Village Pubs

The applicant dismisses my concerns that FGE will deter walking visitors and walking groups, claiming that '*the effects of FGE on PRoW users will be localised, temporary during construction, not significant, and mitigated by the introduction of additional permissive routes*'. The applicant provides no evidence to support this opinion. In my career as a tourism consultant, I undertook a number of research projects to understand the key motivations of walking and cycling visitors. This consistently showed that their enjoyment comes from being in the countryside and enjoying the views and nature. It is not just about walking or cycling from A to B, or more commonly A to A in a circular route. The applicant completely fails to understand this. I believe that I have demonstrated in the evidence that I have submitted to the Enquiry that the experience of using the Aubourn to Bassingham Long Walk will be significantly damaged by FGE, to the extent that it will no longer be an enjoyable country walk between the two villages. I hope that the ExA will have reached a similar conclusion from your site visits. I maintain that this is likely to reduce visitor and local resident usage of the route, with a consequent reduction in trade for the village pubs in Aubourn and Bassingham that are frequented by these walking visitors and local walkers. I cannot provide any quantitative evidence to support this opinion or show the extent to which walking visits and

the trade they generate for local pubs will reduce if FGE goes ahead. While the applicant claims that FGE will not materially deter walking and cycling visits or materially affect trade for the area's pubs, they do not provide any evidence to support this contention. They merely offer an unevidenced counter opinion to the view that I have expressed based on my knowledge of the walking visitor market, my lived experience as a frequent user of the Aubourn to Bassingham Long Walk and the Royal Oak pub in Aubourn for recreational walking and as an activity that we frequently engage our visitors in.

7. Conclusion

On balance, my expert opinion is that the impact of the FGE project on the area's Visitor Economy will be negative. I can't tell you how negative, but I believe that the impact will be negative. I do not believe that the applicant has provided any evidence to support its counter opinion that FGE will have positive benefits and no negative impacts on the area's Visitor Economy. The fact that neither I nor the applicant are able to provide any quantitative evidence to support our opinions does not mean that there will be no threat to the future trading performance of the area's non-serviced accommodation businesses, the potential for future investment in non-serviced accommodation development, and the loss of business for local pubs from walking and cycling visitors. I maintain that there remains a very real threat that FGE will have a negative impact on the area's Visitor Economy and that this threat should be given due weight by the ExA in reaching a conclusion on the potential effects on the Visitor Economy.