The Planning Act 2008

Application by National Grid Electricity Transmission for the Sea Link Project

East Suffolk Council's comments on the Applicant's Deadline 3 submissions

Deadline 4
(10 February 2026)

Application Ref.: EN020026

East Suffolk Council: [redacted]

1. Introduction

1.1 East Suffolk Council (ESC) has reviewed the Applicant's submissions at Deadline 3, and its comments are provided in the subsequent sections of this document.

1.2 The Examining Authority ('ExA') will be aware that ESC provided comments on some of the Applicant's Deadline 3 submissions during Issue Specific Hearing 2 ('ISH2') and in its ISH2 post-hearing written submission. These issues are therefore not repeated here.

2. ESC's comments on 'Document 9.73: Applicant's Responses to First Written Questions' (Version A) [REP3-069]

Applicant's Response to Question 1LVIA4. of the Examining Authority's First Written Questions ('ExQ1')

2.1 ESC noted in its response to Question 1LVIA4. of ExQ1 that the lighting design parameters are not expressly to be approved. There is, for example, no outline lighting management plan to be certified nor detailed plan to be approved under Requirement 6 that includes details of the operational lighting. ESC considers that this is clearly necessary.

2.2 ESC has reviewed the Applicant's response to Question 1LVIA4. of ExQ1. The Applicant states that *'details of operational lighting would be submitted to the relevant planning authority (with relevant county authorities required to be consulted) to allow them to confirm the details are in general accordance with Table 3.1 design principle N.4'* as part of a discharge of Requirement 3 (Converter Station Design). This Design Principle (ID N.4, [APP-366]) requires the management of light spillage by minimising the provision of lighting in order to comply with the dark skies strategy. It is stated that a technical statement could be provided for the external lighting designs, including a strategy for the site, how lighting provision has been minimised, and details of fittings and lighting profiles, controls, and energy efficiency ratings.

2.3 Whilst ESC welcomes this in principle, it is concerned that the suggestion of producing a technical statement as a 'potential associated activity' is not a strong enough control, particularly given that the wording of Requirement 3 of the dDCO [REP3-006] as currently drafted only requires the submitted details to be in general accordance with the Key Design Principles.

2.4 ESC therefore continues to request that the Applicant adopts a similar approach to that taken by ScottishPower Renewables in its East Anglia ONE North and East Anglia TWO DCOs and prepares an outline lighting

management plan to be certified, with a more detailed Lighting Management Plan to be prepared post-consent for approval under Requirement 6.

2.5 Furthermore, the Applicant acknowledges itself that *'design principle N.4 does not include operational lighting design for substations'* in response to 1LVIA4. There is, therefore, currently no mechanism for approval of the operational lighting for Friston Substation, should a Scenario 2 connection be pursued. Preparation of an Outline Lighting Management Plan, and a requirement for a more detailed Lighting Management Plan to be approved post-consent, would therefore also ensure that operational lighting at the substation is minimised in line with the dark skies strategy.

Applicant's Response to Question 1AQ1. of ExQ1

2.6 The Applicant states that measure CC03 in the Register of Environmental Actions and Commitments ('REAC') [REP3-078] has been revised to remove the commitment to using only SF_6-free switchgear. Measure CC03 of the updated REAC now reads:

> *'The Applicant is proposing to use both SF6-insulated and SF6-free equipment for the project. This is primarily driven by the availability of SF6-free circuit breakers. However, GIS manufacturers now produce switchgear that have no or minimal leakage.'*

2.7 ESC does not have the necessary expertise to comment in depth on the health impacts of this change.

2.8 However, with regard to impacts on climate change, SF_6 is one of the most potent greenhouse gases and even small leakages can have a significantly higher impact than CO_2. As a result, ESC understands that the EU has begun to phase out SF_6-insulated switchgear, and alternative solutions are being developed.

2.9 The Applicant states that SF_6 is not considered to be a local air quality pollutant, and its effects on local air quality are likely to be minimal and short-term. The Applicant would be grateful if the ExA would test this statement.

2.10 In addition, the Applicant does not appear to have commented on the climate change effects of this change. This is an unacceptable omission and ESC asks that the Applicant provides further detail in this regard.

2.11 The Applicant has stated that its move away from committing to the use of SF_6-free switchgear has been *'primarily driven by the availability of SF_6-free circuit breakers'*. Whilst ESC cannot comment on the validity of this claim, ESC strongly objects to the use of SF_6-insulated switchgear, owing to their

significant environmental impacts. ESC requests that the Applicant provides evidence to support its claims of equipment shortage.

2.12 ESC would also query how the Applicant can be confident that equipment availability at the point of construction will be the same as at the present time. ESC considers it would be appropriate for the REAC commitment to commit to SF_6-free switchgear, unless the Applicant can demonstrate to stakeholders' satisfaction that equipment shortages mean this is not feasible. The Applicant should be required to demonstrate that this is the position at the time of procurement – should consent for the Project be given.

2.13 Furthermore, ESC notes that the National Grid website states:

> *'Where we do still need to use SF_6 (such as for maintenance), we re-use SF_6 from decommissioned equipment wherever possible.'*

2.14 ESC therefore requests that the Applicant includes a commitment to the use of SF_6 from decommissioned equipment in the event that the use of SF_6-insulated switchgear is required.

2.15 The Applicant also claims that switchgear with 'no or minimal leakage' is now available. National Grid's website states:

> *'Electrical switchgear using SF_6 is designed to avoid the release of the gas into the atmosphere, but small quantities are released during the lifecycle of the equipment: manufacture, installation, operation, maintenance and decommissioning. Larger leaks can also occur during its lifecycle, for example due to equipment malfunction.'*

2.16 ESC is therefore extremely concerned that the Applicant has downplayed the potential for leakage.

2.17 In summary, ESC is not satisfied that the Applicant has adequately justified its decision to go back on its commitment to using SF_6-free switchgear. If sufficient justification can be provided, ESC considers that measure CC03 in the REAC requires amendments to ensure that the Applicant is committed to using SF_6-free switchgear where feasible.

<u>Applicant's Response to Question 1SERT1. of ExQ1</u>

2.18 ESC does not accept the Applicant's conclusion that the Suffolk Onshore element of the Sea Link project ('the Suffolk Onshore Scheme') will not have an impact on the East Suffolk tourism industry. It is patently clear that the detrimental impact during construction and the visual impact once the scheme is operational will have a serious impact on local tourism and it is disappointing – to say the least - that the Applicant is making such untenable claims.

2.19 ESC recently commissioned Visitor Perceptions Research that identified a group of 4,000 past or future East Suffolk visitors and divided them into seven segments or category of visitor.

2.20 Within this group are the Relaxation Seekers; a significant portion of visitors who associate the area specifically with "peacefulness," "nature," and "beauty".

2.21 This group are at risk of being displaced by the cumulative effect of multiple NSIP projects in East Suffolk. A perception of 'industrialisation' conflicts with the primary driver for visitation in both the 'Relaxation Seekers' and another segment, the 'Self-Caterers'.

Applicant's Response to Question 1SERT2. of ExQ1

2.22 The Applicant states that construction workers and tourists can be considered to have broadly similar spending habits. ESC has not identified any evidence to support this claim in fact, and has conveyed its position on this matter in its response to Question 1SERT2. of ExQ1 [REP3-085].

2.23 The spending habits of visitors and tourists are well understood and measured by the tourism industry on an annual basis. The impact of non-home-based (NHB) workers on available visitor accommodation stock and how they spend their money within the local economy is less clear.

2.24 The Applicant assumes that both visitors and workers spend money primarily on accommodation, food and drink, supporting the same local hospitality businesses. These high-level assumptions may be logical but provide no insight into the types of accommodation or food and drink providers used. This is important because, for example, food and drink establishments which cater to the needs of visitors may not be so attractive to workers who are in East Suffolk for employment purposes.

Applicant's Response to Questions 1SERT3. and 1SERT4. of ExQ1

2.25 If constructed purely in isolation, it could be that elements of the Suffolk Onshore Scheme would not, during the construction period, have a detrimental impact on visitor numbers in East Suffolk, although clearly certain elements will be seriously detrimental and in reality, of course, Sea Link will not be constructed in isolation.

2.26 ESC would draw attention to the number and scope of the multiple NSIP developments under construction in East Suffolk which is without precedent, and to its knowledge, without compare. This unique circumstance means that reference to the methodologies and findings of other NSIP application documents, whilst possibly of occasional interest, should not and cannot be

applied or transferred to East Suffolk. No two projects are the same and for the Applicant to claim otherwise is irrational.

2.27 The Sizewell C Project Environmental Statement, Chapter 9 Socioeconomics (provided as Appendix A to this submission) argued that *'there is limited empirical evidence that the Sizewell C project would lead to a quantifiable reduction in visitor numbers or a change in visitor behaviour.'*

2.28 However, that said, Sizewell C recognised and accepted that there would still be the potential for the tourist economy to be adversely affected as a result of the Sizewell C Project and made available a Tourism Fund to *'develop mitigation measures to reduce this risk and promote the area in order to reduce the risk of perceived changes in visitor behaviour from materialising.'*

2.29 The Local Government Association New Nuclear Local Authorities Group ('NNLAG') has commissioned studies into the impacts of the construction of Hinkley Point C ('HPC'). One aim of the second study ('Hinkley Point C Peak Construction: Impacts Monitoring and Auditing Study (2023-24)', submitted into the Sea Link Examination as Appendix B to this submission) was to revisit and refresh a series of key performance indicators ('KPIs') used in the 2019 HPC Study 1. These KPIs relate to six key sectors used in the study: economic development, transport, social and community, accommodation, environmental health, and biophysical environment.

2.30 Tourism business confidence was one measure within the economic development sector group. The findings of the 2023-2024 study recorded that business confidence was above a baseline of 35% and stood at 46% in 2018 but lacked any recent confidence data after that date.

2.31 Another measure, tourist perception data (Survey of impact of HPC on Somerset tourism, Qa Research, 2023) suggested that over 90% of tourists are not affected by HPC construction activity.

2.32 ESC has not been able to undertake a review of the survey data but notes that the measure is one of perception and not a measure of the number of visitors to the Hinkley Point C area.

2.33 Drawing on the above data, and bearing in mind, as noted, that no two projects are the same, ESC remains extremely concerned regarding the potential impact of the Suffolk Onshore Scheme and other NSIPs on visitor numbers to East Suffolk.

<u>Applicant's Response to Question 1SERT5. of ExQ1</u>

2.34 The Applicant considers that there is unlikely to be any notable decline in tourism numbers and tourism industry revenue as a result of the Suffolk Onshore Scheme.

2.35 ESC has noted the Applicant's review of other NSIP developments and its analysis of potential effects on tourism and visitor activity. This is not, however, a comparison of like with like and, ESC is less than convinced by the Applicant's predictions which it does not believe will be the case for the reasons outlined below.

2.36 As previously stated, ESC considers that the number and scope of multiple NSIP developments in East Suffolk is without precedent, and to its knowledge, without compare. This unique circumstance means that reference to the methodologies and findings of other NSIP application documents, whilst useful, should not and cannot be simply applied and transferred to East Suffolk. On the contrary, ESC considers that the Applicant's untested assumption and predictions should be treated with extreme caution.

Applicant's Response to Question 1SERT6. of ExQ1

2.37 ESC wishes to emphasise the importance of Snape Maltings as a local and indeed national tourism and economic asset to the visitor economy.

2.38 In addition, ESC will work with its partners, including Snape Maltings, to monitor any unforeseen adverse impacts during the construction phase of the Suffolk Onshore Scheme.

Applicant's Response to Question 1SERT7. of ExQ1

2.1 ESC has previously expressed in detail its view that the Applicant must prepare a Skills and Employment Plan in its response to ExQ1 Question 1SERT7 [REP3-085].

2.2 ESC fails to understand why the Applicant would not consider an Employment and Skills Plan for the Suffolk Onshore Scheme to be an essential element of its application. The project presents a significant opportunity to engage with the wider community including young people and job seekers to raise awareness of the work and career opportunities within the energy sector.

2.3 ESC understands that the Applicant will be submitting an update on its position regarding the preparation of a Skills and Employment Plan at Deadline 4. ESC will review this and provide comments, as necessary, at Deadline 5.

2.4 ESC notes the Applicant's ongoing involvement with regional programmes in support of employment, skills and education, providing that these activities

support local priorities and are connected into local skills and education provision.

3. ESC's comments on 'Document 9.36: Applicant's Comments on Other Submissions Received at Deadline 2' (Version A) [REP1A-029]

3.1 ESC acknowledges that a new measure (MPE08) has been added to the REAC [REP3-078] which commits the Applicant to undertaking further analysis to consider the potential for coastal erosion over the lifetime of the project in line with the final Offshore Construction and Environmental Management Plan ('CEMP'). This information must be used to inform the detailed design of the project, to ensure that the very real risk of future exposure of the offshore burial cables is as reduced as far as practicable.

3.2 The Applicant states, in its comments on Section 7.8 of ESC's Deadline 2 submission [REP3-064], that *'as a follow-up action to this analysis, the monitoring approach can be developed to focus on the beach profile and erosion processes and rates, with an appropriate monitoring schedule for the lifetime of the Proposed Project'.*

3.3 Whilst ESC welcomes this proposal, it queries where this commitment to adapting the monitoring approach following this further analysis, and establishing an appropriate monitoring schedule, is secured. ESC suggests that REAC measure MPE08 could be amended to include this additional detail.

4. ESC's comments on 'Document 9.40: Visitor and Tourism Assessment Technical Note – Suffolk' (Version A) [REP3-065]

Introduction

4.1 ESC welcomes the opportunity to review the Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065] submitted by the Applicant in response to concerns raised by ESC regarding the potentially adverse impacts of the Suffolk Onshore Scheme on the visitor economy.

4.2 ESC notes that within the document, the Applicant maintains its overarching conclusion that the Suffolk Onshore Scheme is unlikely to result in significant adverse effects on visitors or tourism.

4.3 ESC does not accept this conclusion and provides further information below, and within the Appendices to this submission, that support ESC's position.

4.4 ESC is of the view that the Applicant has totally failed to recognise and accept that the in-combination and cumulative impacts of multiple NSIP developments in East Suffolk have the potential to adversely affect the visitor economy. Such impacts should be – and should have been - addressed by the Applicant, and to refuse so to do is unacceptable.

4.5 ESC maintains that within a complex and evolving economic environment, conclusions cannot be drawn in absolute terms or with complete certainty. ESC has previously stated that the number and scope of multiple NSIP developments in East Suffolk is without precedent, and to its knowledge, without compare. This unique circumstance means that reference to the methodologies and findings of other NSIP application documents, whilst useful, cannot be viewed as being applicable or transferable to East Suffolk..

4.6 ESC considers that the continued absence of any identified intention to establish long-term, continuous monitoring and assessment of potential socio-economic impacts of the Suffolk Onshore Scheme on the visitor economy constitutes a fundamental failure of the Applicant's assessment. Neither the Applicant nor ESC can predict the future with certainty, and the absence of any proposed monitoring means that it is impossible to identify any of the inevitable negative changes in the visitor economy, and to plan appropriate interventions. Accordingly, ESC urges the Applicant to commit to long-term, continuous monitoring and assessment.

4.7 ESC's comments below consider the three key areas addressed by the Applicant within the Technical Note in turn: Tourist and Visitor Attractions, Tourist Accommodation Impacts, and Visitor Perception Impacts.

4.8 ESC presents its own commissioned report that challenges the findings and conclusions of the Applicant's review of visitor accommodation (Appendix C). Appendices E and F include the findings of ESC's recently commissioned Visitor Perception Research, which is helping ESC understand who visits East Suffolk and why. This research also provides an insight into visitor perceptions and behaviours following the commencement of construction of the Sizewell C project.

Tourist and Visitor Attractions

4.9 ESC maintains that it is insufficient to consider impacts of the Suffolk Onshore Scheme on individual tourism assets solely in terms of any temporary or permanent land take impacts and severance of access.

4.10 ESC also cannot accept the Applicant's conclusion that there will be no significant inter-project cumulative effects on visitor and tourism receptors.

4.11 For reasons previously outlined by ESC, including in Section 7.8.7 of its Local Impact Report [REP1-128], the Applicant's assessment methodology fails to

consider the complexities and interdependency of tourism receptors and their collective contribution towards a successful visitor economy. The impacts of the Suffolk Onshore Scheme on individual receptors should not be measured in isolation, and not without consideration of the wider effects on the visitor economy.

4.12 ESC is not alone in recognising the visitor economy as a complex system. In 2021, the then government invited Nick de Bois, Chair of the Visit England Advisory Board, to review and make recommendations regarding the structure, management, and funding of destination management in England.

4.13 The de Bois Review: an independent review of destination management organisations in England, which is provided as Appendix D to this submission, supports the claims made by ESC. Paragraph 8 of the Executive Summary recognises that the tourism industry *'fundamentally [understands] that tourism is an ecosystem'* and the success of one business is *'intrinsically linked to the success of the destination as a whole'*.

4.14 The report later goes on to illustrate this: *'Tourists do not just visit a hotel – they stay in one while doing other things in the local area, so for the hotel to be successful, it needs a strong set of local attractions, safe and clean streets, places for its guests to eat and drink, excellent public amenities and effective transport connectivity – to name a few.'*

4.15 This means that construction impacts of the Suffolk Onshore Scheme on individual receptors can create wider, seemingly unconnected, impacts on the visitor economy as a whole and should therefore be recognised and addressed within the assessment.

4.16 Visit England were subsequently tasked with implementing the far-reaching recommendations of the de Bois Review; restructuring England's destination management structures into a portfolio of tiered organisations that determine tourism strategy, manage and coordinate activities, and market destinations in support of the growth and development of the visitor economy.

4.17 Destination Management Plans or Tourism Strategies reflect a systems approach to supporting and developing visitor economies through a developed understanding of all components within the system. These can include tangible assets such as local infrastructure, attractions, accommodation, and amenities; as well as intangible assets such as the perception and reputation of a destination; all of which contribute to the overall visitor experience and success of the destination.

<u>Tourist Accommodation Impacts</u>

4.18 ESC has reviewed Section 3.3 of the Technical Note and Paragraphs 10.7.31-10.7.32 and 10.9.18-10.9.25 of 'Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism' (Version B) [REP1A-005].

4.19 Following this review, ESC remains seriously concerned that there is insufficient evidence for the Applicant to state, with any confidence or certainty, that the available visitor accommodation within a 60-minute drive of the Suffolk Onshore Scheme can accommodate the non-home-based workforce without causing potential harm to the visitor economy.

4.20 It is ESC's view that non-home-based workers could compete with visitors for accommodation, and in a worst-case scenario, there is a very strong potential for the in-combination cumulative demand effects of multiple NSIP developments to exceed the supply of visitor accommodation.

4.21 It has to be pointed out, however, that ESC's own view is uncertain for the simple reason that the Applicant's explanation of the source data, compilation methodology, inclusion/exclusion criteria, and whether the inventory includes only serviced accommodation or also non-serviced/holiday accommodation is worryingly inadequate and thereby fails to supply the information required nor meet acceptable standards. This inevitably limits auditability and confidence in the conclusions drawn.

4.22 In 2025, ESC commissioned Hotel Solutions and Forward Land to conduct an East Suffolk Hotel & Visitor Accommodation Study. The study will contribute towards a Tourist Accommodation Plan to mitigate the impacts of Sizewell C worker demand set in context of a wider East Suffolk Hotel and Visitor Accommodation Study.

4.23 The Final Report is due to be published in Quarter 1, 2026.

4.24 ESC does have sight of the Interim Results of the study and the headline serviced and non-serviced accommodation count is presented in Figure 1 below.

4.25 Figure 1 shows that there are 249 serviced establishments (Hotels, Venues, Pubs & Inns and Bed & Breakfasts) with 4,221 rooms in the 60-minute travel zone. This contrasts sharply with the 7,038 tourist accommodation "inventory rooms" in local hotels, bed & breakfasts and inns as reported by the Applicant at Paragraph 10.7.32 of Chapter 10 (Socioeconomics, Recreation and Tourism) of the ES [REP1A-005].

4.26 Clearly the conflicting results are a cause for concern. That conflict alone suggests that the Applicant's conclusion that the construction workforce could be accommodated within the local accommodation sector must be called into question.

4.27 To address this concern, ESC invited Forward Land and Hotel Solutions to provide an independent assessment of the Applicant's submission documents. The Review of Tourist Accommodation Assessment (Sea Link NSIP) can be found in Appendix C to this submission.

4.28 Within this review, Forward Land and Hotel Solutions concluded that:

> *'Whilst the applicant has sought to demonstrate that accommodation capacity is sufficient, the evidence base is undermined by a lack of transparency, reliance on generalised assumptions, and limited local market grounding. Given East Suffolk's tourism sensitivity and the potential for cumulative construction demand, we do not consider the submitted accommodation assessment sufficiently robust to support a conclusion of no adverse effects without further clarification and evidence. We would recommend that any decisions be deferring pending the presentation of more detailed information to allow more thorough appraisals.'*

4.29 ESC does not accept the findings of the Applicant's analysis of Tourism Accommodation Impacts and cannot do so until the Applicant provides the clarifications and further evidence identified within the Forward Land and Hotel Solutions review document.

TOTAL 60 MINUTE ACCOMMODATION SUPPLY

SIZEWELL C: 60 MINUTE TRAVEL ZONE	ESTABLISHMENTS	ROOMS / UNITS / PITCHES	BEDSPACES	BEDSPACES % OF STUDY AREA
Hotels	78	3,275	6,550	**12%**
Wedding Venues	4	71	142	0.3%
Pubs & Inns	50	325	650	1%
Guest Houses/ B&Bs	117	550	1,100	2%
Total Serviced	**249**	**4,221**	**8,442**	**16%**
% of Study Area	*4%*	*17%*	*15%*	
Self-Catering & Glamping	5,172	11,882	24,931	**44%**
Camping , Caravan Sites	136	4,433	9,463	17%
Holiday Parks	24	3,630	13,438	**24%**
Hostels and Retreats	4	71	205	0.4%
Total Non-Serviced	**5,336**	**20,016**	**48,037**	**85%**
% of Study Area	*96%*	*83%*	*85%*	
Total Accommodation	**5,585**	**24,237**	**56,479**	

Figure 1: Headline serviced and non-serviced accommodation count from the interim results of the East Suffolk Hotel & Visitor Accommodation Study

Visitor Perception Impacts

4.30 Critical to the success of any business or economic sector is the importance of identifying its existing and potential customers, and then developing a thorough understanding of their needs, wants, and experiences of the products and services on offer.

4.31 Without this understanding, a sector such as the visitor economy cannot adapt and evolve to meet the prevailing economic conditions and realise the business opportunities available, risking the loss of its customers, the visitors, and tourists to East Suffolk, to other visitor destinations within the UK or abroad.

4.32 ESC is committed to supporting the long-term success and prosperity of the visitor economy in East Suffolk. To achieve this, ESC works with a comprehensive network of public and private sector stakeholders and partner organisations to understand the factors that contribute towards a successful visitor economy, to identify and set strategic objectives, and to develop appropriate action plans that deliver beneficial outcomes.

4.33 Unfortunately, ESC considers that the Applicant's assessment of visitor perception impacts falls seriously short in its understanding of the importance and value of visitor perception as a measure, or barometer, of the wider potentially adverse impacts of the Suffolk Onshore Scheme on the visitor economy.

4.34 Whilst ESC acknowledges the Applicant's desk-based review of other energy NSIPs in East Anglia and Somerset, ESC is concerned that in conducting its review, the Applicant has strayed from an assessment of visitor perception to a broader assessment of potentially negative socio-economic impacts including mitigation by project design, broader environmental impacts, and visitor accommodation assessments, all of which may affect visitor perception but on their own do not provide a quantitative or qualitative measure of visitor perception nor any changes in perception and consequent effects on visitor behaviour.

4.35 Sizewell C, within paragraphs 9.7.63 to 9.7.93 of its Socio-economics ES chapter (Appendix A) refers to survey work at Hinkley Point C and Sizewell C. The surveys were developed to help understand whether visitor perceptions would translate into realised changes in visitor behaviour.

4.36 Sizewell C concluded at Paragraph 9.7.90 that *'there is limited empirical evidence that the Sizewell C project would lead to a quantifiable reduction in visitor numbers [or] a change in visitor behaviour'*. However, they admit at Paragraph 9.7.69 that *'it is very difficult to draw quantified conclusions from*

surveys where people are asked to estimate how they would react to a hypothetical situation'.

4.37 Despite these conclusions, Sizewell C recognised that there may still be the potential for the tourist economy to be adversely affected as a result of the Sizewell C Project, and made available a Tourism Fund to *'develop mitigation measures to reduce this risk and promote the area in order to reduce the risk of perceived changes in visitor behaviour from materialising'* (Paragraph 9.8.12).

4.38 ESC acknowledges that the Suffolk Onshore Scheme is a much smaller project than Sizewell C. However, the potential impacts on visitor perception and subsequent behaviour remain the same.

4.39 Additionally, the ExA should note that East Suffolk is not in a hypothetical situation based on untested assumptions and unproven predictions and is likely to experience the construction of multiple energy related NSIP developments over the course of the next decade. The resulting in-combination and cumulative impacts, and their resulting effects on the visitor economy need to be monitored and assessed during the construction period and beyond.

Visitor Perception Research

4.40 Visitor Perception or Attitudinal Studies are industry accepted tools that provide insight and understanding into how visitors view, experience, and choose destinations.

4.41 In 2025, ESC commissioned research that examined how current and potential visitors to East Suffolk feel about holidays and trips and the impact of Sizewell C development.

4.42 The East Suffolk Visitor Perceptions Research (Appendix E) is important because it is one of the largest and most in-depth studies of this type to have been conducted in East Suffolk and provides both quantitative and qualitative evidence of visitor perceptions which had previously been unavailable to NSIP examinations.

4.43 Uniquely, the research is ongoing and will be repeated over the course of the next decade, providing a prospective, longitudinal record and evaluation of trends in visitor perception over time.

4.44 12,564 members of the UK population completed an online survey which allowed researchers to identify an East Suffolk Group of 4,000 individuals who are past or future visitors to East Suffolk. These individuals were then engaged

in further, more detailed, questioning that allowed the East Suffolk Group to be sub-divided into seven 'distinct and revealing' segments (Appendix F). These segments were then invited to participate in qualitative research interviews.

4.45 Whilst the purposes of the research are much broader than a focussed examination of the impacts of NSIP development in East Suffolk, the East Suffolk Group were asked specific questions about Sizewell C, the intention being to inform ESC's understanding of the current and potential impact of the Sizewell C development on an individual's intention to visit East Suffolk.

4.46 Initial findings from the wider questioning show that 39% of the "East Suffolk Group" (past and future visitors) are more likely to visit other areas of the UK during construction.

4.47 Additionally, concerns over the impact of construction on the local area also emerged, with traffic (56%), the impact on the local character of the region (56%), and the impact on wildlife (67%), featuring most prominently.

4.48 This initial research provides an effective baseline from which ESC can measure visitor perception, intent, and realised behaviours. Any changes in the baseline will be identified through future iterations of the research. The information gathered will then inform ESC and its partners on the most appropriate approach to supporting the East Suffolk visitor economy, guiding marketing and promotional campaigns, and shaping future investment decisions.

Conclusion

4.49 ESC does not accept the conclusions drawn by the Applicant in the Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065].

4.50 To support this claim, ESC has provided additional data, insight, and examples of tourism industry consensus thinking in its assessment:

- In terms of the broader impacts on Tourist and Visitor Attractions, the Applicant's assessment methodology fails to consider the complexities and interdependency of tourism receptors and their collective contribution towards a successful visitor economy. ESC is not alone in recognising the visitor economy as a complex system and has presented evidence that this view is shared by the tourism industry.
- The Applicant has failed totally to provide the essential evidence required to be able to state, with any confidence or certainty, that the available visitor accommodation within a 60-minute drive of the Suffolk Onshore Scheme can accommodate the non-home-based workforce without causing serious harm to the visitor economy. ESC invited Forward Land and Hotel Solutions to provide an independent

assessment of the Applicant's submission documents, the recommendations of which support ESC's own concerns.

- Visitor Perception or Attitudinal Studies are industry accepted tools that provide insight and understanding into how visitors view, experience, and choose destinations. East Suffolk is likely to experience (and is already experiencing) the construction of multiple energy related NSIP developments over the course of the next decade and the resulting in-combination and cumulative impacts on the visitor economy need to be genuinely and comprehensively monitored and assessed in order to be understood. ESC has presented Visitor Perception data which demonstrates that the effects of NSIP development on visitor perception and behaviour can be measured and has provided cautionary insights into the effects of NSIP development in East Suffolk.

APPENDIX A – The Sizewell C Project Volume 2 Main Development Site Chapter 9 Socio-economics (Source: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-001815-SZC_Bk6_ES_V2_Ch9_Socio-economics.pdf)



The Sizewell C Project

6.3 Volume 2 Main Development Site

Chapter 9 Socio-economics

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May 2020

Planning Act 2008
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Appendix 9A: Technical Note 1: Workforce Profile.

Appendix 9B: Technical Note 2: Demographic Benchmarks and Workforce Characteristics.

Appendix 9C: Technical Note 3: Workforce Spatial Distribution.

Appendix 9D: Technical Note 4: Accommodation Datasets and Assumptions.

Appendix 9E: Technical Note 5: Sport and Leisure Audit and Estimated Demand.

Appendix 9F: Sizewell C: Suffolk Coast Visitors Survey.

9 Socio-economics

9.1 Introduction

9.1.1 This chapter of **Volume 2** of the **Environmental Statement** (**ES**) (Doc Ref. 6.3) presents an assessment of the socio-economic effects arising from the construction and operation of the Sizewell C power station at the main development site, and the associated development sites (referred to throughout this volume as 'the proposed development'). This includes an assessment of potential impacts, the significance of effects, the requirements for mitigation and the residual effects. The assessment is project-wide in nature – it considers the overall socio-economic effects of the Sizewell C Project's components on sensitive receptors such as the labour market, housing market and public services.

9.1.2 Descriptions of the existing site and proposals for the main development site are provided in **Chapters 1-4** of this volume of the **ES**. Descriptions of the existing sites and proposals for associated development sites are provided in **Chapters 1-2** of **Volumes 3-8** (Doc Ref. 6.4-6.9) of the **ES**. A description of the anticipated activities for the decommissioning phase, including a summary of the types of environmental effects likely to occur is provided in **Chapter 5** of this volume. A glossary of terms and list of abbreviations used in this chapter is provided in **Appendix 1A** of **Volume 1** of the **ES** (Doc Ref. 6.2).

9.1.3 The scope of the socio-economic assessment considers the following construction and operational phase impacts.

a) Construction impacts

- Economic impacts:
  - labour market impacts due to change in the level of construction employment generated in the economy;
  - employment impacts due to a change in the overall level of employment; and
  - business and supply chain impacts as a result of contracts and spending related to the Sizewell C Project.
- Accommodation impacts:
  - impacts on overall supply of homes as a result of increased demand generated by the temporary construction workforce;

  - tourist sector accommodation impacts;
  - private rented sector (PRS) impacts; and
  - owner-occupied sector impacts.

- Population dynamics: impacts on the existing population due to an increase in population generated by the construction workforce.

- Public services impacts of increased demand generated by the construction workforce and their families for the following services:

  - childcare and education services – early years, primary school and secondary school places;
  - social services;
  - other county and district level services;
  - sports and leisure facilities; and
  - emergency services.

b) Operational impacts

- employment: impact of additional employment in a high value added sector; and

- wider economic impacts: effects on skills, education, spending, and supply chain.

9.1.4 A standalone ES was prepared for the Sizewell B relocated facilities works for submission with the hybrid application under the Town and Country Planning Act 1990 (East Suffolk Council application ref. DC/19/1637/FUL). The Sizewell B relocated facilities ES (included in **Appendix 2A** of **Volume 1** of the **ES**) scoped out the assessment of socio-economic effects, as no potential for likely significant effects from the Sizewell B relocated facilities proposals on their own were identified. However, the assessment presented within this chapter also accounts for the effects of the Sizewell B relocated facilities project, as it forms part of the Sizewell C Project.

9.2 Structure of this chapter

9.2.1 The chapter is structured as follows:

- **Section 9.3** sets out the legislation, policy and other documentation that has informed the assessment. This includes national policy, including relevant national policy statements (NPS) that help set the

parameters to the assessment, and highlights areas of local policy that are considerations for the potential effects on communities within the study areas.

- **Section 9.4** sets out the methodology applied to the assessment, including: a summary of the responses to consultation that have informed the approach; the study areas; the datasets that have informed the baseline assessment; and the methodology applied to determine the assessment of the significance of the socio-economic effects.

- **Section 9.5** details the baseline conditions across the assessment study areas, against which the impacts will be assessed, including the population, economic and labour market baseline, accommodation baseline and community facilities baseline.

- **Section 9.6** describes the Sizewell C Project's embedded design and mitigation measures relevant to the assessment of socio-economic effects.

- **Section 9.7** sets out the assessment of effects during the construction and operational phases.

- **Section 9.8** describes the proposed mitigation and monitoring to address the potential adverse effects, and enhance the beneficial effects identified at **section 9.7**.

- **Section 9.9** concludes by setting out the likely residual effects of the Sizewell C Project, taking into account mitigation and monitoring described at **section 9.8.**

9.2.2 As detailed in **section 9.4** of this chapter, the approach to the socio-economic assessment has been informed by engagement with Suffolk County Council (SCC), and East Suffolk Council (ESC) (note ESC was formed following the merger of the former Suffolk Coastal District (SCDC) and Waveney District Councils (WDC)), as well as service providers and local stakeholders, and community groups. The assessment of effects has therefore been established through an iterative process of engagement and refinement.

9.2.3 This assessment has been informed by data from other assessments including:

- **Chapter 10** of **Volume 2** of the **ES**: Transport.

- **Chapter 28** of **Volume 2** of the **ES:** Health and Wellbeing.

9.2.4 This assessment has been informed by data presented in the following technical notes appended to the chapter:

- **Appendix 9A:** Technical Note 1: Workforce Profile.
- **Appendix 9B:** Technical Note 2: Demographic Benchmarks and Workforce Characteristics.
- **Appendix 9C:** Technical Note 3: Workforce Spatial Distribution.
- **Appendix 9D:** Technical Note 4: Accommodation Datasets and Assumptions.
- **Appendix 9E:** Technical Note 5: Sport and Leisure Audit and Estimated Demand.
- **Appendix 9F:** Sizewell C: Suffolk Coast Visitors Survey.

9.3 Legislation, policy and guidance

9.3.1 An overview of legislation, policy and guidance specifically of relevance to this socio-economic assessment is set out in **Appendix 6E** of **Volume 1** of the **ES.**

9.3.2 As stated in **Chapter 3** of **Volume 1** of the **ES**, the overarching NPS for Energy (Ref 9.1) when combined with the NPS for Nuclear Power Generation (Ref 9.2) provides the primary basis for decisions by the Secretary of State on applications for nuclear power generation developments such as this.

9.3.3 The NPSs for Energy Infrastructure set out government energy policy; the need for new infrastructure; and guidance in determining an application for a Development Consent Order (DCO). The NPSs include specific criteria and issues which should be covered by applicants' assessments of the effects of their scheme, and how the Planning Inspectorate should consider these impacts. They include specific references to socio-economic effects.

9.3.4 Notwithstanding this, the Secretary of State may consider other matters that are both important and relevant to decision-making. This could include national, regional and, local policy documents.

9.3.5 Further, the Planning Act 2008 provides that in making a decision on a nationally significant infrastructure project, regard must be made to any

local impact report prepared by relevant local authorities. It is anticipated that the local impact report would rely in part on national, regional and local policy to provide context. On this basis, and on the basis that such policy may contain information or be supported by evidence that is of relevance to this assessment, regard has been given to these documents (where relevant to the technical assessment).

a) Summary

9.3.6 A full summary of legislation, guidance and policy relevant to this assessment is included in **Appendix 6E** of **Volume 1** of the **ES.**

9.3.7 The policy review demonstrates there are a large number of policies at the national, regional and local levels relevant to the socio-economic assessment of the Sizewell C Project.

9.3.8 In order to meet the requirements of the Overarching National Policy Statement for Energy (NPS EN-1) (Ref 9.1) (paragraph 5.12.4), the review of legislation, policy and guidance seeks to capture the key policy areas covered which need to be addressed in the assessment.

9.3.9 This can be split into three categories:

- Process and Criteria Policies: are those which set out how the assessment should be undertaken, the weight given to different issues in the assessment, and how impacts should be addressed.
- Assessment of Impact and Mitigation: are those areas identified by policy makers in which the proposals at Sizewell C might have an impact, which, if negative, might require mitigation.
- Enhancement and Legacy: are those areas identified, predominantly in local policy, where potential positive impacts of the Sizewell C Project might be delivered in a way which could be enhanced to achieve wider policy objectives.

9.3.10 The distinction between the second and third categories is important in order to identify areas in which the applicant might be expected to minimise or mitigate impacts as a requirement, and those in which longer term partnership working might provide enhanced outcomes.

9.3.11 The following policy documents are considered in the context of the development of the baseline, assessment of effects, and design of mitigation for this assessment (these are set out in detail in **Appendix 6E** of **Volume 1** of the **ES**):

- Overarching National Policy Statement for Energy (NPS EN-1).
- National Policy Statement (NPS) for Nuclear Power Generation (NPS EN-6) (Ref 9.2).
- National Planning Policy Framework (NPPF) 2019 (Ref 9.3).
- Industrial Strategy, building a Britain fit for the future (November, 2017) (Ref 9.4).
- Industrial Strategy Nuclear Sector Deal (June 2018) (Ref 9.5).
- HM Government, Integrated Communities Strategy Green Paper (March 2018) (Ref 9.6).
- Local Industrial Strategy for Norfolk and Suffolk, New Anglia Local Enterprise Partnership (LEP) (2019) (Ref 9.7).
- The East Norfolk and Suffolk Economic Strategy, New Anglia LEP (November 2017) (Ref 9.8).
- Suffolk Growth Strategy, SCC (Ref 9.9).
- Transforming Suffolk, Suffolk's Community Strategy 2008-2028, Suffolk Strategic Partnership (June 2008) (Ref 9.10).
- Suffolk Coastal Final Draft Local Plan (January 2019) (Ref 9.11).
- Suffolk Coastal District Local Plan Core Strategy and Development Management Policies, SCDC (July 2013) (Ref 9.12).
- SCDC Leisure Strategy 2014-2024, SCDC (Ref 9.13).
- East Suffolk Means Business, East Suffolk Business Plan (2015-2023) (Ref 9.14).
- East Suffolk Economic Growth Plan, 2018-2023 (Ref 9.15).
- East Suffolk Tourism Strategy 2017-2022, ESC (Ref 9.16).
- East Suffolk Housing Strategy 2017-2023, ESC (Ref 9.17).

- Waveney Local Plan, East Suffolk Council, (Adopted March 2019) (Ref 9.18).

- Leiston Neighbourhood Plan 2015-2029, Leiston Neighbourhood Forum, (March 2017) (Ref 9.19).

9.4 Methodology

a) Scope of the assessment

9.4.1 The generic Environmental Impact Assessment (EIA) approach and methodology is detailed in **Chapter 6** of **Volume 1** of the **ES** (Doc Ref. 6.2).

9.4.2 This section provides an overview of the specific details of the socio-economic methodology applied to the assessment of the Sizewell C Project, and a summary of the general approach to provide appropriate context for the assessment that follows. The scope of assessment considers the impacts of the construction and operation phases of the Sizewell C Project.

9.4.3 **Appendix 6E** of **Volume 1** of the **ES** sets out details of the methodology.

9.4.4 The scope of this assessment has been established through a formal EIA scoping process undertaken with the Planning Inspectorate. A request for an EIA scoping opinion was initially issued to the Planning Inspectorate in 2014, with an updated request issued in 2019.

9.4.5 Comments raised in the EIA scoping opinion received in 2014 and 2019 have been taken into account in the development of the assessment methodology. These are detailed in **Appendices 6A** and **6C** of **Volume 1** of the **ES**.

b) Consultation and engagement

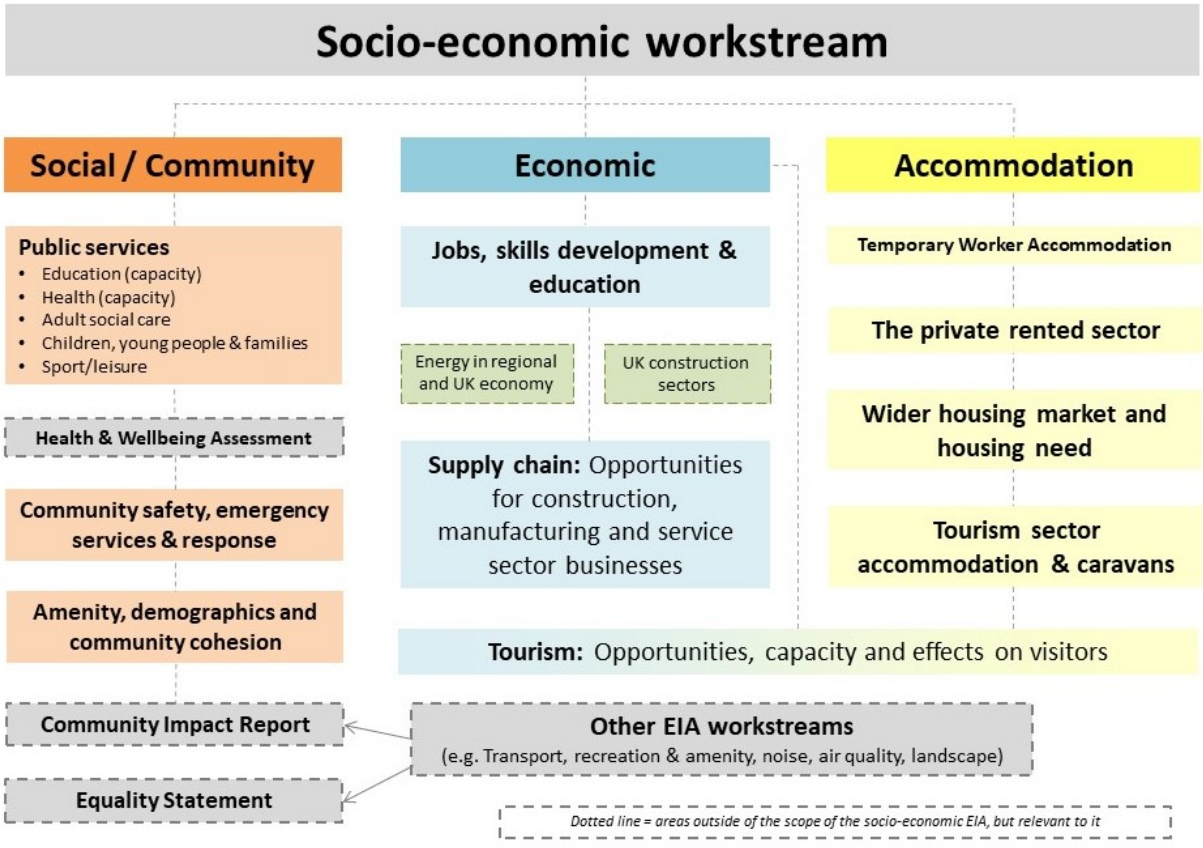
9.4.6 The scope of the assessment has also been informed by ongoing consultation and engagement with statutory consultees throughout the design and assessment process.

9.4.7 The **Consultation Report** (Doc Ref. 5.1) describes the full process which SZC Co. has carried out, the requirements for which are set out in primary and secondary legislation, including meetings held with ESC and SCC throughout the EIA process to discuss the scope of the assessment. A summary of the comments raised and SZC Co.'s responses are detailed in **Annexes A** to **H** to the **Consultation Report**.

9.4.8 The **Consultation Report** also identifies responses to comments made by individuals, statutory bodies and other organisations, and includes a socio-economic section, cross referenced with this chapter.

9.4.9 A series of formal socio-economic working groups, incorporating representatives from ESC and SCC and SZC Co. were established from 2013. The working groups have considered the Sizewell C Project assumptions and methodology adopted for the assessment, the approach to assessing effects and identifying critical issues, and the development of analysis leading to mitigation. Membership of the working groups has expanded to include other relevant stakeholders, including but not limited to local tourism and skills/educational organisations, the emergency services, and the NHS as the assessment has progressed. **Plate 9.1** sets out the approach to issues within the wider socio-economic workstream, which has influenced the working groups' membership and scope.

Plate 9.1: Components of the socio-economic workstream



9.4.10 A series of technical notes were prepared as part of this engagement and formal consultation process, and these are appended. The methodology, baseline and development of project assumptions is summarised in the following bullet points:

- **Appendix 9A** of this volume – this note sets out how the workforce is anticipated to change throughout the Sizewell C Project in terms of its size, components (e.g. skill levels), and the extent to which the workforce is home-based (HB) or non-home-based (NHB). It is based on information from Hinkley Point C, Sizewell B, and other projects, as well as early contractor involvement.

- **Appendix 9B** of this volume – this note sets out the anticipated demographic profile and other population characteristics of the workforce, based on 2011 Census data and other research from national industry bodies.

- **Appendix 9C** of this volume – this note describes how the workforce is anticipated to distribute geographically at the peak of construction activity, drawing on information from other technical notes in this list, and the Gravity Model (a 'distance decay' model based on workers' propensity to travel to work, informed by value of time estimates and the location of available accommodation).

- **Appendix 9D** of this volume – this note sets out the Sizewell C Project's assumptions about which accommodation sectors the NHB workforce is likely to live in, based on demand and supply aspects using research and public datasets, and experience from other projects.

- **Appendix 9E** of this volume – this note sets out the baseline for sport and leisure provision across the study area and describes the methodology and assessment for potential temporary demand for facilities from the NHB workforce, using guidance and methodology from Sport England.

c) Study areas

9.4.11 The spatial extent of the socio-economic assessment includes the main development site, all associated development sites, and the surrounding area, with administrative geographies defined by each socio-economic topic.

9.4.12 The precise areas used are partly influenced by data availability and, in some cases, also reflect the boundaries of relevant service planning areas, e.g. for school or health facilities.

9.4.13 The spatial scope of the socio-economic baseline studies therefore varies by impact category. Full details of the approach to defining study areas are

set out in **Appendix 6E** of **Volume 1** of the **ES**, and summarised in the following paragraphs.

9.4.14 **Figure 9.1** shows the following study areas in relation to the main development site:

- local wards (Leiston, Aldeburgh, Saxmundham, Aldeburgh and Yoxford);
- the ward-based 60-minute travel area (used for NHB workers);
- local authority areas within the 60-minute travel area; and
- the (90-minute) construction daily commuting zone (CDCZ) (used for HB workers).

9.4.15 Administrative geography is the primary scale at which baseline data from public datasets can be collected – this includes (from smallest/most local to largest/widest):

- Output Areas, Super Output Areas and Wards – used to define local areas where effects may occur at a sub-local authority scale such as localised housing or population changes.
- District and county level – these areas form the basis of the assessment of impacts on the local labour market (wider economic impacts), housing market, and public services.
- Regional level – this area forms the basis of sub-national economic and labour market effects in particular.
- National level – depending on the dataset, this could refer to the United Kingdom, Great Britain, or England, and is used to demonstrate the scale of effects, benchmarks, or changes from a wider average.

i. Workforce effects

9.4.16 Socio-economic effects are primarily related to the size, characteristics, and distribution of the construction workforce and whether that workforce is HB or NHB. As such, there are two ward-based assessment scales regularly used in this assessment. These are based on the Gravity Model, which includes inputs from the socio-economic assessments on the workforce profile, skills profile of the resident workforce, and accommodation location

and availability. It then, based on travel times, allocates the expected distribution of the construction workforce across defined travel areas:

- 60-minute travel time: This is a collection of wards within a defined 60-minute travel area from the main development site. It represents the estimated extent of daily travel to the construction site by NHB workers.

- CDCZ: The CDCZ is defined as the wards within an approximately 90-minute commute time of the main development site. The CDCZ is used primarily to define the local (HB) labour market for the construction phase. The definition of the CDCZ involves consideration of a range of factors which affect workers' willingness to commute, including time, distance, and travel allowances; plus findings from other studies of the mobility of UK construction workers.

9.4.17 Where data is not available at the ward-scale, best-fit local authority boundaries have been used.

9.4.18 A full description of detailed inputs to the determination of the 60-minute travel area and CDCZ is included in **Appendix 9A** of this volume, with specific elements covered in **Appendix 9C** and **Appendix 9D** of this volume, as well as in the **Transport Assessment** (Doc Ref 8.5).

ii. Accommodation study areas

9.4.19 Accommodation data is generally produced across all administrative geographies, though more recent and different datasets are available at a local authority scale.

9.4.20 Generally, accommodation effects are relevant to the local authority (district) scale as this is the level at which housing services and support for housing vulnerability is statutorily provided.

9.4.21 Accommodation effects are also influenced by the distribution of the workforce across the 60-minute travel area which allows for some analysis at local authority scale, and ward-based assessment of localised effects.

9.4.22 It is also relevant to have regard to other spatial scales including the Strategic Housing Market Area. The NPPF (Ref 9.3) requires local authorities to assess housing needs at this level, rather than at an individual local authority level, to ensure a sound needs assessment is provided. The Strategic Housing Market Area areas within the 60-minute travel area are therefore relevant when considering the accommodation impacts of the Sizewell C Project. There are two Strategic Housing Market Area areas within the 60-minute travel area – Ipswich (including Ipswich and Babergh,

Mid-Suffolk, and the former SCDC local authority areas), and Waveney (the former WDC local authority area only) zones.

iii. Economic study areas

9.4.23 Economic data is generally produced across all administrative geographies, though more recent and different datasets are available at a local authority scale.

9.4.24 Generally, economic effects are relevant to wider scales as this is the level at which labour markets operate and at which business services, skills provision, and education are planned for.

9.4.25 Economic effects are also influenced by the distribution of the workforce across the 60-minute travel area (in terms of the economic effects of NHB workers), and the CDCZ (in terms of employment supported for HB workers).

9.4.26 It is also relevant to consider potential effects with regard to other spatial scales such as the LEP. The New Anglia Local Enterprise Partnership (NALEP) is one of 38 LEPs across the country which are spatially defined partnerships between local authorities, public sector organisations, and business. LEPs aim to lead economic growth and job creation. NALEP covers the two counties of Norfolk and Suffolk, and sets economic objectives across this spatial area.

iv. Public services study areas

9.4.27 Public services are provided at different scales depending on the type of service. For this assessment, study areas include:

- District (ESC) scale – for the provision of local services including leisure and regulatory and environmental services.
- County (SCC) scale – for the provision of local services including education and social services and some emergency service provision (organisations providing services at this scale include SCC, Suffolk Constabulary and Suffolk Fire and Rescue Service).

9.4.28 There are also local study areas depending on the organisation of services and reporting of public information, for example, neighbourhood policing areas which are generally groups of wards.

v. Other relevant study areas

9.4.29 It is also relevant to consider potential effects with regard to other spatial scales:

- Effects on tourism may be relevant to consider at a range of scales depending on the nature of effects and the location of tourist sector accommodation and designations.

- Effects related to the operational workforce would be determined by the likely spatial distribution of the workforce, and the subsequent effect on the local and regional economies.

d) Baseline assessment

9.4.30 Baseline information has been identified through (see **Appendix 6E** of **Volume 1** of the **ES** for further details):

- Analysis of publicly-available demographic and economic datasets including nationally recognised data, and survey information obtained from the Office for National Statistics (ONS), and other Government departments including the Ministry of Housing, Communities and Local Government.

- Work undertaken through various accompanying technical notes, included as **Appendices 9A**–**9E** of this volume.

- Work on the Gravity Model which has been used to assess the spatial distribution of the workforce, undertaken jointly with the transport workstream. A full description of the model and its inputs is set out in the **Transport Assessment** (Doc Ref. 8.5).

- Consultation with appropriate statutory bodies.

- Review and audit of public services and community facilities, including education, and healthcare from relevant public data sources including The NHS Website and Annual School Census.

e) Assessment approach

9.4.31 The potential for significant socio-economic effects is primarily linked to the workforce profile, which sets out the change in employment required as a result of construction activity across the duration of the construction phase.

9.4.32 As such, assessments are presented, where appropriate, at the peak of construction workforce demand, representing the potential reasonable worst case effect on, for example, demand for accommodation and public services.

9.4.33 It is recognised that some effects may occur at different stages of the construction phase, that mitigation may require a lead-in time to ensure that it is effective, and that effects may be determined by the change in workforce over time compared to the components of the Sizewell C Project, such as project accommodation provision. Therefore, where appropriate, assessments are made in the context of annual change over the duration of the construction phase.

9.4.34 There would also be effects during the operational phase when construction is complete, for the lifetime of the Sizewell C Project, and these are assessed from completion of the construction phase.

f) Assessment criteria

9.4.35 As described in **Chapter 6** of **Volume 1** of the **ES**, the EIA methodology considers whether impacts of the proposed development would have an effect on any resources or receptors. Assessments consider broadly the magnitude of impacts and value/sensitivity of resources/receptors that could be affected in order to classify effects.

9.4.36 **Appendix 6E** of **Volume 1** of the **ES** sets out the approach to value, sensitivity and magnitude that combine to form the assessment of significance for socio-economic effects.

9.4.37 **Table 9.1** identifies those impacts where significance can be defined with reference to the baseline and quantitative indicators. Other qualitative assessments are based on professional judgement. They seek, so far as is possible, to identify quantitative criteria as to the level of change in relation to the current capacity of the area (for example for schools and accommodation), or in the context of current annual rates of turnover and change in population. This recognises the dynamic nature of the environment with which the Sizewell C Project would interact.

Table 9.1: Approach to assessment of significance for socio-economic effects

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
Economic Effects – Construction					
Home-based (HB) recruitment.	Adverse	No adverse effects are considered in terms of employment generation – all effects are considered to be beneficial in this regard (potential secondary effects on labour market churn are also considered).			
	Beneficial	HB employment equivalent to >10% of existing construction employment.	HB employment equivalent to 5% to 10% of existing construction employment.	HB employment equivalent to <5% of existing construction employment.	HB employment equivalent to <1% of existing construction employment.
Effects on unemployment and economic inactivity.	Adverse	No adverse effects are considered in terms of the effects of the Sizewell C Project on unemployment and economic activity – all effects are considered to be beneficial in this regard.			
	Beneficial	HB workforce drawn from unemployment represents >5% of current registered unemployed.	HB workforce drawn from unemployment represents 3% to 5% of current registered unemployed.	HB workforce drawn from unemployment represents <3% of current registered unemployed.	No workforce drawn from current unemployment/economic inactivity.
Effects on labour market churn and 'displacement'.	Adverse	Assessed qualitatively in the context of existing labour market churn in the construction sector.			
	Beneficial				
Business and supply chain.	Adverse	No adverse effects are considered in terms of the effects of the Sizewell C Project on business and the supply chain – all effects are considered to be beneficial in this regard.			
	Beneficial	Assessed qualitatively based on the potential for contract value to be secured.			
Wages/spending and additionality.	Adverse	No adverse effects are considered in terms of the effects of the Sizewell C Project on wages/spending and additionality – all effects are considered to be beneficial in this regard.			

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
	Beneficial	Assessed qualitatively based on the potential for net additional contribution to the economy of earning and expenditure.			
Effects on tourism economy.	Adverse	Assessed qualitatively based on the identification of potential perceived sensitivities to changes in visitor behaviour in the context of the existing visitor environment and characteristics of the Suffolk coast, and evidence of perceived effects versus observed effects elsewhere.			
	Beneficial				
Effects on agricultural economy.	Adverse	Agricultural land lost represents > 10% of agricultural land in Suffolk.	Agricultural land lost represents 5–10% of agricultural land in Suffolk.	Agricultural land lost represents 1–5% of agricultural land in Suffolk.	Agricultural land lost represents < 1% of agricultural land in Suffolk.
	Beneficial	Beneficial effects on the regional agricultural economy are not likely to arise as a result of the Sizewell C Project resulting in either no change or overall loss to the quantum of land in this sector, and have therefore not been considered in this assessment.			
Effects of transport on business.	Adverse	Assessed qualitatively based on a review of overall effects of the Sizewell C Project on the transport network, and the ability for potentially affected businesses to claim statutory compensation should they perceive they qualify for it.			
	Beneficial				
Accommodation Effects – Construction					
Tourist sector.	Adverse	Workforce demand exceeds 50% of available and affordable capacity at peak season.	Workforce demand exceeds 25% of available and affordable capacity at peak season.	Workforce demand exceeds 10% of available and affordable capacity at peak season.	Workforce demand is less than 10% of available and affordable capacity at peak season.
	Beneficial	Beneficial effects may occur where construction workforce has the potential to use otherwise vacant accommodation, particularly off—peak. This has been considered qualitatively, as it is likely to fluctuate between seasons, and is considered at the 60-minute area scale only.			
Private rented sector (PRS).	Adverse	Workforce demand exceeds 20% of overall stock or 100% of frictional vacancy needed for	Workforce exceeds 10% of overall stock or 50% of frictional vacancy needed for PRS to	Workforce demand is less than 50% of frictional vacancy needed for PRS to operate.	Workforce demand is less than 10% frictional vacancy needed for PRS to operate.

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
		PRS to operate.	operate.		
	Beneficial	Beneficial effects on the PRS are not considered in this assessment. The Sizewell C Project only has the potential to cause adverse effects due to the nature of demand for private rented accommodation. However, there may be long-term beneficial effects associated with mitigation strategies that leave legacy benefits in terms of the overall supply and quality of accommodation in the sector.			
Owner-occupied sector.	Adverse	> 50% of annual turnover of owner-occupied sector.	25–50% of annual turnover.	10–25% of annual turnover.	< 10% of annual turnover.
	Beneficial	Beneficial effects on the owner-occupied sector are not considered in this assessment, as the Sizewell C Project only has the potential to cause adverse effects due to the nature of demand for owner occupied accommodation.			
Population Dynamics – Construction					
Population change and dynamics.	--	Effect of new NHB workers represents >50% of annual average new residents.	Effect of new NHB workers represents 20% to up to 50% of annual average new residents.	Effect of new NHB workers represents 10% to up to 20% of annual average new residents.	Effect of new NHB workers represents less than 10% of annual average new residents.
Public Services – Construction					
Childcare and education.	Adverse	Effect of new population if additional means exceeding current capacity, where baseline levels were not already at or exceeding capacity.	Effect of new population if additional takes surplus capacity to within 5% of total capacity, or exceeds existing capacity by between 5% and 10% where baseline levels	Effect of new population if additional takes surplus capacity to within 10% of total capacity, or exceeds existing capacity by up to 5% where baseline levels were already at or exceeding	Effect of new population if additional means no change to within 10% of surplus capacity, or no change from baseline significance.

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
			were already at or exceeding capacity.	capacity.	
	Beneficial	Beneficial effects on the childcare and education sector are not likely to occur as a result of the Sizewell C Project, which will not lead to an alleviation of need for these services as a result of physical interventions or implementation strategies, and have therefore not been identified in this assessment.			
Social services.	Adverse	Assessed qualitatively – drawing on information from scheme design and implementation strategies such as the **Community Safety Management Plan** (Doc Ref. 8.16), Worker Code of Conduct**, Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9) and **Accommodation Strategy** (Doc Ref. 8.10) supplemented by review of potential risks/issues identified through engagement related to project-wide effects.			
	Beneficial	Beneficial effects on the social care sector are not likely to occur as a result of the Sizewell C Project, which will not lead to an alleviation of need for these services as a result of physical interventions or implementation strategies, and have therefore not been identified in this assessment.			
Other county-level services.	Adverse	Assessed qualitatively based on the potential for NHB construction workers to create net additional demand for services in the context of their demographic characteristics, accommodation choices, locations and duration of residence.			
	Beneficial	Beneficial effects on other county level services are not likely to occur as a result of the Sizewell C Project, which will not lead to an alleviation of need for these services as a result of physical interventions or implementation strategies, and have therefore not been identified in this assessment.			
Formal sports and leisure.	Adverse	Unmet demand for additional formal sports and leisure facilities as a result of the construction workforce equivalent to whole facilities being needed, or a contribution to new facilities (considered qualitatively, informed by published standards of demand).			No, or imperceptible impact on demand for or supply of formal sports and leisure provision.
	Beneficial	The Sizewell C Project will deliver sports facilities that both meet the needs of workers and provide additional	The Sizewell C Project will deliver sports facilities that both meet the needs of workers and provide	The Sizewell C Project will deliver sports facilities that meet the needs of workers and help to attract a high-quality	No, or imperceptible impact on demand for or supply of formal sports and leisure provision.

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
		community resource in an area or sector of existing deficiency.	additional community resource.	workforce.	
Regulatory and environmental services.	Adverse	Proportion of NHB workforce in non-council-tax accommodation represents >10% increase in population at District level.	Proportion of NHB workforce in non-council-tax accommodation represents 5% to 10% increase in population at District level.	Proportion of NHB workforce in non-council-tax accommodation represents 2% to 5% increase in population at District level.	Proportion of NHB workforce in non-council-tax accommodation represents <2% increase in population at District level.
	Beneficial	Beneficial effects on regulatory and environmental services are not likely to occur as a result of the Sizewell C Project, which will not lead to an alleviation of need for these services as a result of physical interventions or implementation strategies, and have therefore not been identified in this assessment.			
Crime and policing.	Adverse	Potential estimated increase of more than 20% in crime rates per 1,000 population.	Potential estimated increase of between 10% and 20% in crime rates per 1,000 population.	Potential estimated increase of between 1% and 10% in crime rates per 1,000 population.	Potential estimated increase of up to 1% in crime rates per 1,000 population.
	Beneficial	Assessed qualitatively – drawing on information from scheme design and implementation strategies such as the **Community Safety Management Plan** (Doc Ref. 8.16), supplemented by review of potential risks/issues identified through engagement related to project-wide effects.			
Fire service.	Adverse	Assessed qualitatively – drawing on information from **Transport Assessment** (Doc Ref. 8.5) and scheme design and implementation, supplemented by review of potential risks/issues identified through engagement related to project-wide effects.			
	Beneficial	Assessed qualitatively – drawing on information from **Transport Assessment** (Doc Ref. 8.5) and scheme design and implementation that could improve service provision in the long-term.			

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
Community cohesion and integration.	Adverse	Assessed qualitatively using national government definitions of community cohesion, integration, and sustainability.			
	Beneficial				
Operational Effects					
Local direct employment.	Adverse	No adverse effects are considered in terms of employment generation – all effects are considered to be beneficial in this regard.			
	Beneficial	Employment equivalent to >20% of existing employment in energy generation sector.	Employment equivalent to 10% to 20% of existing employment in energy generation sector.	Employment equivalent to 1% to 10% of existing employment in energy generation sector.	Employment equivalent to <1% of existing employment in energy generation sector.
Local indirect employment/economic effects.	Adverse	No adverse effects are considered in terms of local indirect employment generation and economic effects – all effects are considered to be beneficial in this regard.			
	Beneficial	Assessed qualitatively based on the potential for net additional contribution to the economy of earning and expenditure.			
Business and supply chain.	Adverse	No adverse effects are considered in terms of business and supply chain effects – all effects are considered to be beneficial in this regard.			
	Beneficial	Assessed qualitatively based on the potential for contract value to be secured locally.			
PRS	Adverse	Workforce demand exceeds 20% of overall stock or 100% of frictional vacancy needed for PRS to operate.	Workforce exceeds 10% of overall stock or 50% of frictional vacancy needed for PRS to operate.	Workforce demand is less than 50% of frictional vacancy needed for PRS to operate.	Workforce demand is less than 10% frictional vacancy needed for PRS to operate.
	Beneficial	Beneficial effects on the PRS are not considered in this assessment, as the Sizewell C Project only has the potential to cause adverse effects due to the nature of demand for private rented accommodation during the operational phase.			

Impact	Beneficial/Adverse	Major	Moderate	Minor	Negligible
Owner-occupied sector.	Adverse	> 50% of annual turnover of owner-occupied sector.	25–50% of annual turnover.	10–25% of annual turnover.	> 10% of annual turnover.
	Beneficial	Beneficial effects on the owner-occupied sector are not considered in this assessment, as the Sizewell C Project only has the potential to cause adverse effects due to the nature of demand for owner occupied accommodation.			
Net additional demand for public services.	Adverse	Assessed qualitatively considering the net additionality of operational workforce and their contribution to service delivery through general taxation.			
	Beneficial	Beneficial effects on public services are not likely to occur as a result of the Sizewell C Project, which will not lead to an alleviation of need for these services as a result of physical interventions or implementation strategies, and have therefore not been identified in this assessment.			
Population change, community cohesion and integration.	Adverse	Assessed qualitatively using national government definitions of community cohesion, integration and sustainability, and considering the annual rate of additional residents as a result of the NHB portion of the operational workforce.			
	Beneficial				

9.4.38 Following the classification of an effect as presented in **Table 9.1**, a clear statement is made as to whether the effect is 'significant' or 'not significant'. As a general rule, major and moderate effects are considered to be significant and minor and negligible effects are considered to be not significant. However, professional judgement is also applied where appropriate.

g) Assessment methodology

9.4.39 The assessment of likely significant socio-economic effects within the study areas has been undertaken by reference to the likely changes from the baseline conditions, and the effects of those changes as a result of the Sizewell C Project.

9.4.40 The assessment has considered the following potential effects.

i. Economic effects

9.4.41 The economic effects of the Sizewell C Project are primarily driven by the demand for goods from the supply chain and for services in terms of contracts and labour recruitment to deliver the Sizewell C Project. These are informed by:

- the overall value of the Sizewell C Project; and
- the mix of contract packages required over the construction phase in terms of supply chain and employment.

9.4.42 Labour market effects are considered in terms of the demand for local employment, and the benefits that demand brings to existing labour markets and in terms of the amount of NHB labour brought into the region for the Sizewell C Project. These influence the economy in terms of skills demands, productivity, effects on unemployment and economic inactivity, expenditure and additionality effects[1].

9.4.43 Jobs supported by the Sizewell C Project directly would result in changes to employment levels in the local employment structure. These would depend on both the demands of the Sizewell C Project at different points in the construction phase, and associated policies, but there is likely to be a major increase in local employment/opportunities. There would also be a multiplier effect with indirect (e.g. local supplier firms) and induced (e.g.

[1] Net positive difference that results from economic development intervention. The extent to which an activity (and associated outputs, outcomes and impacts) is larger in scale, at a higher quality, takes place more quickly, takes place at a different location, or takes place at all as a result of intervention. Additionality measures the net result, taking account of deadweight, leakage, displacement, substitution and economic multipliers.

local service jobs) effects from the Sizewell C Project. There may also be some labour market churn as some employees move into roles on or associated with the Sizewell C Project from other local employers.

9.4.44 Primarily, employment effects are considered in terms of their value relative to the existing construction economy and labour market, levels of unemployment and economic inactivity and labour market churn, and output/productivity.

9.4.45 This chapter also considers the wider economic effects of the Sizewell C Project including the proportion and estimated value of local supply chain benefits and secondary benefits from employee spending.

9.4.46 In addition, the chapter looks at effects on other sectors – primarily:

- tourism: considering potential sensitivities that may affect peoples' perceptions of the area with the potential to lead to changes in visitor behaviour; and

- agriculture: in terms of loss of land, and therefore agricultural activity supporting jobs. Effects on severance or changes to landholdings affecting businesses (accounting for any proposed mitigation that SZC Co. would undertake) is assessed in **Chapter 17** of this volume (Doc Ref. 6.3) for the main development site and **Chapter 10** of **Volumes 3-9,** (Doc. Ref. 6.4-6.10) for associated developments.

ii. Accommodation effects

9.4.47 The effects of the Sizewell C Project on accommodation and housing markets are driven by the number and location of NHB workers associated with the project, and the types of accommodation they are likely to stay in. The assessment considers the effects on:

- Owner-occupied accommodation: potential for increased demand for family-type owner-occupied homes in the local area from long-term construction workforce and operational workers.

- Private rented accommodation: potential for increased demand for private rented accommodation from the NHB workforce, and particularly where there may be effects related to the lower 30th percentile of the sector where tenants may be in housing need, or in receipt of housing benefits, or otherwise vulnerable to ending of tenancy.

- Tourist accommodation: potential for increased demand for tourist accommodation from NHB workforce.

iii. Public services, community and demographics

9.4.48 The effects of the Sizewell C Project on the population, community facilities, and public services are driven by the number and location of NHB workers throughout the construction phase (as set out in the workforce profile), and their demographic and characteristics. This influences how they may be anticipated to create additional demand for services/facilities. The assessment considers:

- Population/demographic change: changes in the local population level and structure. For example, there is likely to be a large NHB and male population during the construction phase, a proportion of whom could be accompanied by families; there would be smaller numbers with a longer term presence during the operational phase.

- Impact on local social conditions and associated services: project-related demographic changes have the potential to adversely impact on local social conditions and associated services. For example, a non-home-based construction workforce may have the potential to lead to a change in demand for local healthcare facilities, school and policing services which could create possible issues for the local population (e.g. impact on school places, crime in the community; traffic flows/noise).

- Other less tangible socio-cultural change: changes in the level and structure of employment and demographic changes could have the potential to affect quality of life, community character/cohesion and integration. Parts of the local community may be differently affected by the development, or there could be a shift in the character of some communities (especially those close to the main development site or on key transport routes to the Sizewell C Project).

h) Assumptions and limitations

9.4.49 Project assumptions and limitations have been set out in:

- **Appendix 6E** of **Volume 1** of the **ES**; and

- technical notes appended to this chapter – **Appendices 9A**–**9E.**

9.4.50 In summary, these assumptions and limitations include:

- assumptions about the duration and phasing of the Sizewell C Project and its associated development, acknowledging internal and external uncertainties such as the political and economic climate;
- the size, profile, and characteristics of the construction workforce;
- the recruitment of the workforce and the extent to which it would be HB and NHB;
- the accommodation likely to be used by the NHB workforce;
- the operational workforce; and
- limitations related to datasets (representing a 'snapshot' in time) and the approach to dynamism of the baseline.

i. Core assumptions

9.4.51 The Sizewell C Project's transport and socio-economic effects are influenced by two core assumptions about the construction workforce:

- the number of workers required over time, by skill/role, and the extent to which they can be sourced from existing labour markets (HB) or would temporarily move to the area (NHB); and
- the spatial distribution of workers (by accommodation type) across the area.

9.4.52 The first assumption is driven by the Workforce Profile – details of which are set out in **Appendix 9A** of this volume and summarised in **Figure 9.2** and **Figure 9.3**.

9.4.53 This sets out that this assessment uses a workforce profile peaking at 7,900 workers – this is a precautionary approach to ensure that appropriate mitigation can be applied.

9.4.54 Both core assumptions are driven by the gravity model and accommodation assumptions – details of which are set out in **Appendix 9A, Appendix 9C** and **Appendix 9D** of this volume.

9.4.55 Throughout this assessment, the effects of these combined assumptions are considered in terms of their influence on the significance of effects on the economy and labour market, accommodation and public services.

ii. Definitions

9.4.56 Throughout this assessment reference is made to a number of different terms relating to the Sizewell C Project's workforce, defined in order to adequately inform the assessment of effects. The following terms are defined here:

- Workers: In line with standard practice, a 'worker' is defined using the 'five day rule' – meaning people who spend at least five days working on the site in a given month. This enables the distinction of workers who may generate the potential for socio-economic effects e.g. on housing or public services from visitors. This therefore does not include 'visitors' to the site (see below). There may be up to 7,900 workers at peak.

- Visitors: Occasional visitors to the site for work, not meeting the definition of a worker (see above) and therefore not likely to generate the potential for socio-economic effects – though likely to contribute to transport effects.

- Associated development workers: This refers to the operational staff at associated development sites – up to 600 at peak including operation of the facilities within the on-site accommodation campus.

- Employment years: It is not possible to identify in detail the length of each contract for each skill type required. One way of representing the employment – and headline economic effects – supported by the construction phase of the Sizewell C Project is to consider how many years of employment would be needed overall across the workforce profile. Overall, based on standard working hours, the Sizewell C Project would support around 40,000 years of employment throughout the construction phase of the Sizewell C Project. This does not mean that there would be 40,000 'jobs' – contracts will be of varying lengths. SZC Co. will seek to re-utilise people through different roles in order to promote sustainable careers and efficient working.

- Non-home-based workers: Workers who retain a home address outside of the 60-minute area, but move to the area temporarily (likely returning home between working periods) in a range of short-medium term accommodation.

- Home-based workers: Workers who already live within 90-minutes of the site.

- Workers on-site: For clarity, this assessment does not consider the total number of workers on-site at any given time. While this is an important distinction for transport assessments, the definition of 'workers' above is more relevant for considering impacts on socio-economic receptors.

9.5 Baseline environment

9.5.1 This section describes the socio-economic baseline for the Sizewell C Project, including a summary of key characteristics of the local area's socio-economic baseline, including demographic, economy and employment, accommodation, education, health and leisure facilities.

a) Current baseline

i. Population and population density

9.5.2 The six local authorities closest to the site (East Suffolk, Great Yarmouth, Ipswich, Babergh, Mid Suffolk and South Norfolk) (the 'immediate districts') have a combined population of 817,100 (ONS, mid-year population estimates, 2018). East Suffolk's population comprises just under one third of the total (248,200).

9.5.3 The largest settlements in the immediate districts are Ipswich and Felixstowe to the south of the area, and Lowestoft and Great Yarmouth to the north.

9.5.4 Of the six immediate districts, four are predominantly rural, and the area as a whole has a low population density (2.1 residents per hectare (ha)). Across the 60-minute travel area (which does not extend to the urban areas of Ipswich and Great Yarmouth), population density is very low at 1.6 residents per ha).

9.5.5 In the five wards surrounding the main development site there are 19,470 residents living at a low density of 1.2 people per ha.

9.5.6 **Table 9.2** summarises the total population and population density in the immediate districts, the 60-minute travel area and the CDCZ, and in the wards surrounding the site.

Table 9.2: Population and population density

Area	Population Estimates 2018	Area Size (ha)	Population Density
Local Wards			
Leiston	6,515	2,512	2.6

Area	Population Estimates 2018	Area Size (ha)	Population Density
Saxmundham	5,765	3,030	1.9
Snape	1,982	3,871	0.5
Yoxford	2,022	5,473	0.4
Aldeburgh	3,183	1,764	1.8
Districts			
Great Yarmouth	99,370	17,419	5.7
South Norfolk	138,017	90,771	1.5
East Suffolk	248,249	126,125	2.0
*Suffolk Coastal**	129,938	*89,156*	1.5
*Waveney**	118,311	*36,968*	3.2
Mid Suffolk	102,493	87,107	1.2
Ipswich	137,532	3,941	34.9
Babergh	91,401	59,378	1.5
Study Area.			
60-minute travel area	320,861	206,159	1.6
CDCZ (90-minute travel area)	1,776,727	792,074	2.2
Wider Scales.			
Norfolk	903,680	537,056	1.7
Suffolk	758,556	380,018	2.0
East	6,201,214	1,910,838	3.2
England	55,977,178	13,027,843	4.3

Source: ONS, mid-year population estimates, 2019

** Suffolk Coastal and Waveney have since combined to form East Suffolk District*

ii. Age and gender profile

9.5.7 The immediate districts have higher proportions of older people, and lower proportions of working age people, compared with the national average. This disparity is particularly striking in East Suffolk district where 27% of residents are aged 65 and over compared to a regional average of 19% and 18% nationally. This is outlined in **Table 9.3**.

9.5.8 This trend is reflected across the 60-minute travel area where 27.1% of residents are aged 65 and over, and 55.9% are working age (aged 16–64). Across the CDCZ, which incorporates a number of larger urban areas, the proportion of working-age residents is closer to the national average (59.4% of CDCZ residents compared to 62.6% national average).

9.5.9 The gender split across the 60-minute and CDCZ areas is in line with averages for the East of England and nationally – with slightly higher proportions of females (51%) compared to males (49%) across all areas. This is broadly the case across the immediate districts, although there are some variations at lower spatial scales.

Table 9.3: Age profile

Area	% Children (0–15)	% Working Age (16–64)	% Older People (Age 65+)	Gender (M:F)
Local Wards				
Leiston	16.5%	57.7%	25.8%	49:51
Saxmundham	19.4%	54.6%	26.0%	47:53
Snape	14.0%	53.2%	32.8%	47:53
Yoxford	11.6%	47.6%	40.8%	48:52
Aldeburgh	10.0%	44.9%	45.1%	45:55
Districts				
Great Yarmouth	17.8%	58.0%	24.2%	49:51
South Norfolk	18.1%	58.0%	24.0%	49:51
East Suffolk	16.9%	55.9%	27.1%	49:51
*Suffolk Coastal**	16.7%	56.0%	27.3%	49:51
*Waveney**	17.2%	55.9%	26.9%	48:52
Mid Suffolk	16.9%	58.8%	24.3%	49:51
Ipswich	20.3%	63.2%	16.4%	50:50
Babergh	17.0%	57.0%	26.0%	49:51
Study Area				
60-Minute Travel Area	17.0%	56.4%	26.6%	49:51
CDCZ (90-Minute Travel Area)	17.6%	59.4%	23.0%	49:51
Wider Scales				
Norfolk	16.9%	58.8%	24.3%	49:51
Suffolk	18.1%	58.7%	23.2%	49:51
East	19.4%	61.0%	19.6%	49:51
England	19.2%	62.6%	18.2%	49:51

Source: ONS, mid-year population estimates, 2019.

iii. Recent population growth

9.5.10 The population of the immediate districts increased by an estimated 27,500, or 3.5%, over the five years between mid-2013 (ONS, 2014) and mid-2018 (ONS, 2014). This rate of population growth is below the East of England (4.2%) and national (3.9%) averages shown in **Table 9.4**. Within this area, population growth has been highest in South Norfolk (an increase of 10,300 or 8.1%). The population of East Suffolk grew by 6,800 (2.8%) over the same period. Recent population growth in the five wards surrounding the main development site was approximately 1,100 or 6.0%.

Table 9.4: Population growth, 2013–18

Area	2013 Population	2018 Population	Growth
Local Wards			
Leiston	6,331	6,515	2.9%
Saxmundham	4,988	5,765	15.6%
Snape	1,888	1,982	5.0%
Yoxford	1,986	2,022	1.8%
Aldeburgh	3,176	3,183	0.2%
Districts			
Great Yarmouth	97,736	99,370	1.7%
South Norfolk	127,682	138,017	8.1%
East Suffolk	241,426	248,249	2.8%
*Suffolk Coastal**	125,212	129,938	3.8%
*Waveney**	116,214	118,311	1.8%
Mid Suffolk	98,431	102,493	4.1%
Ipswich	135,604	137,532	1.4%
Babergh	88,704	91,401	3.0%
Other Scales			
60-minute travel area	311,564	320,861	3.0%
CDCZ (90-minute travel area)	1,703,064	1,776,727	4.3%
Wider Scales			
Norfolk	870,296	903,680	3.8%
Suffolk	735,844	758,556	3.1%
East	5,951,934	6,201,214	4.2%
England	53,865,817	55,977,178	3.9%

Source: ONS, mid-year population estimates, 2014 and 2019.

iv. Migration

9.5.11 The latest statistics on internal migration flows at local authority area level are shown in **Table 9.5** for mid-2017 to mid-2018 (ONS, 2019 – local area migration indicators). This shows an annual net inflow of around 4,764 people into the immediate districts, including 2,176 into East Suffolk district.

Table 9.5: Internal migration flows (within the UK): immediate districts

Area	Migration into Area	Migration from Area	Migration Net Flow
Districts			
Great Yarmouth	4,286	4,132	150
South Norfolk	9,899	7,369	2,530
East Suffolk	12,416	9,980	2,440
*Suffolk Coastal**	*7,129*	*5,690*	*1,439*
*Waveney**	*5,287*	*4,290*	*997*
Mid Suffolk	6,063	5,219	840
Ipswich	6,593	7,822	-1,230
Babergh	5,430	4,730	700
Wider Scales			
Norfolk	31,566	26,131	5,440
Suffolk	26,814	23,359	3,460
East	176,465	167,656	8,810
England	99,676	118,100	-18,424

Source: ONS local area migration indicators, 2019.

9.5.12 The population at all scales is dynamic and mobile. Approximately 11% of people move either within, to or from the District area each year, compared to 12% across England (Census, 2011).

9.5.13 National Insurance number registrations for foreign national adults in the immediate districts rose by 17% between 2014 and 2019 (Department for Work and Pensions (DWP), 2019). However, the rise was focused in Ipswich where there was a 66% increase in registrations; there was also a small (3%) rise in South Norfolk, while all other districts saw a fall in registrations – as shown in **Table 9.6.**

9.5.14 These numbers do not track whether migrants become permanent residents or the duration of their stay. Many would be temporary seasonal

workers. However, in the context of the annual migration figures described above they still form a minority of migration to the area.

Table 9.6: National insurance number registrations for foreign national adults

Area	Year to March 2014	Year to March 2019	% Change
East Suffolk	660	650	-2%
*Suffolk Coastal**	*368*	*471*	*28%*
*Waveney**	*292*	*179*	*-39%*
Great Yarmouth	852	656	-23%
Ipswich	1,436	2,386	66%
Mid Suffolk	168	148	-12%
Babergh	295	206	-30%
South Norfolk	336	346	3%

Source: DWP, 2014; DWP, 2019.

v. Baseline dynamics

9.5.15 A baseline study has been conducted to identify the turnover in population and jobs at a local scale using Census Moving Groups (2011) analysis for population turnover and by applying average job turnover for the UK (Organisation for Economic Co-operation and Development, 2015) to the surveyed jobs (Business Register and Employment Survey, 2019). Turnover is shown in **Table 9.7**.

Table 9.7: Population and jobs turnover

Area	% New Residents in 2011	Total New Residents 2011	Jobs Turnover Estimate at 15–20% (per year)
Local Wards.			
Leiston	5.8%	370	390–520
Saxmundham	8.8%	432	280–380
Snape	9.0%	172	50–60
Yoxford	9.7%	185	110–150
Aldeburgh	9.1%	293	210–280
Districts			
East Suffolk	4.2%	10,068	13,710–18,280
*Suffolk Coastal**	*6.3%*	*7,849*	7,670 – 10,230
*Waveney**	*6.2%*	*7,120*	6,040 – 8,050

Area	% New Residents in 2011	Total New Residents 2011	Jobs Turnover Estimate at 15–20% (per year)
Ipswich	5.6%	7,513	10,750–14,340
Great Yarmouth	3.3%	3,241	5,560–7,420
South Norfolk	5.7%	7,016	8,070–10,760
Mid Suffolk	5.4%	5,242	5,390–7,190
Babergh	5.3%	4,688	4,840–6,460
Other Scales			
60-minute travel area	8.2%	25,179	15,960–21,280
CDCZ (90-minute travel area)	10.1%	170,437	109,204–145,610

Source: Census Moving Groups 2011; BRES, 2019.

9.5.16 The high level of dynamism could be linked to the strength of tourist and agricultural economies in the area, which rely extensively on a seasonal and migratory workforce.

9.5.17 This dynamism means the local area is able to cope with outages every 18 months or so at the existing Sizewell B station. Outages can have a substantial NHB workforce of in the region of 850 workers (out of approximately 1,000 total outage workers). These are absorbed by the local accommodation market without significant difficulties.

vi. Employment

9.5.18 The latest employment estimates for the immediate districts are for 2018, published in 2019 (BRES, 2019). At that time, there were an estimated 321,000 employee jobs across the immediate districts, although total employment including self-employed jobs was somewhat higher, at an estimated 337,000. Just over one quarter of employee jobs (around 91,500) were located in East Suffolk. Employee jobs across the 60-minute travel area are estimated at 106,000. Across the CDCZ there are an estimated 728,000 employee jobs, which represent approximately one quarter of all employee jobs across the East of England (2.8 million jobs).

9.5.19 The main concentrations of employment within the immediate districts are located in the main urban centres of Ipswich, Great Yarmouth, Felixstowe and Lowestoft, as shown in **Table 9.8**.

Table 9.8: Employment estimates

Area	Employee Jobs (2019)	Total Employment (2019)
Local Wards		
Leiston	2,500	2,500
Saxmundham	2,000	2,000
Snape	300	350
Yoxford	700	800
Aldeburgh	1,500	1,500
Districts		
Great Yarmouth	37,000	38,000
South Norfolk	54,000	57,000
East Suffolk	91,500	96,000
*Suffolk Coastal**	51,000	54,000
*Waveney**	40,500	42,000
Mid Suffolk	36,000	38,000
Ipswich	71,500	73,000
Babergh	32,500	34,000
Other Scales		
60-minute travel area	106,000	111,000
CDCZ (90-minute travel area)	728,000	753,000
Wider Scales		
Norfolk	368,000	388,000
Suffolk	323,000	339,000
East	2,781,000	2,880,000
England	25,976,000	26,842,000

Source: BRES, 2019.

9.5.20 BRES estimates, shown in **Table 9.9**, indicate relatively strong employee jobs growth in the East of England over the last six years (15.0% growth) and England as a whole (11.7% growth). Growth across the 60-minute travel area (11.5%) and the CDCZ (10.6%) has been below the national average. In East Suffolk there has been an increase of 5,000 (5.8%) in the number of employee jobs. In the wards surrounding the site, the proportional change in numbers of jobs has been more volatile, reflecting the much smaller number of jobs in these areas. Taking the five wards together, there has been an overall increase in the number of employee jobs of 900 jobs (14.8% change).

Table 9.9: Estimated employee job growth

Area	Employee Jobs (2012)	Employee Jobs (2018)	% Change
Local Wards			
Leiston	2,500	2,500	0.0%
Saxmundham	1,500	2,000	33.3%
Snape	400	300	-25.0%
Yoxford	450	700	55.6%
Aldeburgh	1,250	1,500	20.0%
District			
Great Yarmouth.	37,000	37,000	0.0%
South Norfolk.	47,000	54,000	14.9%
East Suffolk.	86,000	91,000	5.8%
Suffolk Coastal.*	*47,000*	*51,000*	*8.5%*
*Waveney**	*39,000*	*40,000*	*2.6%*
Mid Suffolk.	33,000	35,000	6.1%
Ipswich	65,000	72,000	10.8%
Babergh	30,000	32,000	6.7%
Other Scales			
60-minute travel area	96,000	107,000	11.5%
CDCZ (90-minute travel area)	658,000	728,000	10.6%
Wider Scales			
Norfolk	337,000	368,000	9.2%
Suffolk	295,000	323,000	9.5%
East	2,419,000	2,781,000	15.0%
England	23,256,000	25,976,000	11.7%

Source: BRES, 2013; BRES, 2019.

9.5.21 **Table 9.10** provides a more detailed breakdown of recent employment change in the immediate districts by broad industry sector. The figures include only employee jobs and exclude self-employed workers. Employment growth over the six years 2012-2018 was focused in the health (6,000 jobs); professional, scientific and technical (4,000 jobs); and arts, entertainment, recreation and other services (3,000 jobs) sectors. Employment losses were experienced in a number of sectors, including most significantly education (-1,000 jobs), and manufacturing (-2,000 jobs).

Table 9.10: Employment change by industry sector, immediate districts

Sector	Employee Estimates (2012)	Employee Estimates (2018)	Growth
Agriculture, forestry & fishing	5,000	5,000	0.0%
Mining, quarrying & utilities	5,000	7,000	40.0%
Manufacturing	31,000	29,000	-6.5%
Construction	15,000	17,000	13.3%
Motor trades	6,000	8,000	33.3%
Wholesale	10,000	11,000	10.0%
Retail	32,000	33,000	3.1%
Transport & storage (inc. postal)	20,000	21,000	5.0%
Accommodation & food services	23,000	26,000	13.0%
Information & communication	8,000	9,000	12.5%
Financial & insurance	7,000	8,000	14.3%
Property	3,500	3,500	0.0%
Professional, scientific & technical	17,000	21,000	23.5%
Business administration & support services	19,000	20,000	5.3%
Public administration & defence	13,000	13,000	0.0%
Education	27,000	26,000	-3.7%
Health	45,000	51,000	13.3%
Arts, entertainment, recreation & other services	11,000	14,000	27.3%

Source: BRES, 2013; BRES, 2019.

9.5.22 **Table 9.11** provides a sector breakdown of recent employment change in East Suffolk. The largest sectors in the area are retail (11,000 jobs), health (9,000 jobs), and manufacturing (10,000 jobs).

Table 9.11: Employment change by industry sector, East Suffolk

Sector	Employment Estimates (2013)	Employment Estimates (2019)	Growth
Agriculture, forestry & fishing	3,500	3,500	0.0%
Mining, quarrying & utilities	1,500	1,750	16.7%
Manufacturing	10,000	10,000	0.0%

Sector	Employment Estimates (2013)	Employment Estimates (2019)	Growth
Construction	4,000	4,500	12.5%
Motor trades	2,000	2,250	12.5%
Wholesale	2,500	2,500	0.0%
Retail	11,000	11,000	0.0%
Transport & storage (inc postal)	10,000	10,000	0.0%
Accommodation & food services	8,000	9,000	12.5%
Information & communication	4,000	4,000	0.0%
Financial & insurance	800	800	0.0%
Property	900	1,000	11.1%
Professional, scientific & technical	4,500	6,000	33.3%
Business administration & support services	5,000	4,000	-20.0%
Public administration & defence	3,500	3,500	0.0%
Education	8,000	8,000	0.0%
Health	9,000	9,000	0.0%
Arts, entertainment, recreation & other services	3,500	4,500	28.6%

Source: BRES, 2013; BRES, 2019.

9.5.23 The structure of employment in the immediate districts differs in a number of respects from the national average, with lower representation in professional, scientific and technical activities, business administration and support services, and education.

9.5.24 **Table 9.12** shows employment sectors under-represented in the local economy include information and communication (2.8% of jobs compared to 4.4% nationally), financial and insurance (2.5% compared to 3.5% nationally), professional, scientific and technical (6.5% compared to 9.0% nationally) and education (8.1% compared to 8.9% nationally).

9.5.25 Within this overall picture, there are differences in the importance of specific sectors between East Suffolk, and the immediate districts. East Suffolk has larger proportions of jobs in manufacturing (10.8% of jobs), retail (11.9%), transport and storage (10.8%), accommodation and food services (9.7%), and information and communication jobs (4.3%). East Suffolk has smaller proportions of jobs in financial and insurance (0.9%), business administration and support (4.3%), and health (9.7%).

Table 9.12: Employee jobs by industry sector

Sector	East Suffolk		Immediate Districts		England	
	Jobs	%	Jobs	%	Jobs	%
Agriculture, forestry & fishing (A).	1,750	1.9%	5,000	1.6%	157,000	0.6%
Mining, quarrying & utilities (B, D and E).	1,750	1.9%	7,000	2.2%	315,000	1.2%
Manufacturing (C).	10,000	10.8%	29,000	9.0%	2,082,000	8.0%
Construction (F).	4,000	4.3%	17,000	5.3%	1,202,000	4.6%
Motor trades (Part G).	2,250	2.4%	8,000	2.5%	470,000	1.8%
Wholesale (Part G).	2,500	2.7%	11,000	3.4%	1,084,000	4.2%
Retail (Part G).	11,000	11.9%	33,000	10.2%	2,429,000	9.4%
Transport & storage (inc postal) (H).	10,000	10.8%	21,000	6.5%	1,279,000	4.9%
Accommodation & food services (I).	9,000	9.7%	26,000	8.1%	1,936,000	7.5%
Information & communication (J).	4,000	4.3%	9,000	2.8%	1,150,000	4.4%
Financial & insurance (K).	800	0.9%	8,000	2.5%	902,000	3.5%
Property (L).	900	1.0%	3,500	1.1%	453,000	1.7%
Professional, scientific & technical (M).	6,000	6.5%	21,000	6.5%	2,325,000	9.0%
Business administration & support services (N).	4,000	4.3%	20,000	6.2%	2,388,000	9.2%
Public administration & defence (O).	3,500	3.8%	13,000	4.0%	1,030,000	4.0%
Education (P).	8,000	8.7%	26,000	8.1%	2,312,000	8.9%
Health (Q).	9,000	9.7%	51,000	15.8%	3,306,000	12.7%
Arts, entertainment, recreation & other services (R, S, T and U).	4,000	4.3%	14,000	4.3%	1,156,000	4.5%

Source: BRES, 2019.

9.5.26 Suffolk labour supply in the construction sector is in similar proportions to national and regional supply. There were around 17,000 employee jobs in the construction sector in the immediate districts in 2018, plus a further 5,500 employee jobs in the related activities of architecture, engineering and technical consultancy. These estimates exclude self-employed jobs.

9.5.27 It is important to distinguish between data which includes self-employment, and that which does not because self-employment is very important in the construction sector, due to contractors and sub-contractors not employing people directly. The breakdown of employment (not including self-employment) in construction and related activities (civil engineering and specialist construction activities) is presented in **Table 9.13**.

Table 9.13: Employment in construction and related activities

Area	Construction of Buildings (Standard Industrial Classification (SIC) 41)	Civil Engineering (SIC 42)	Specialised Construction Activities (SIC 43)
Districts			
East Suffolk	1,700	500	2,500
*Suffolk Coastal**	1,000	300	1,250
*Waveney**	700	200	1,250
Great Yarmouth	400	175	1,000
South Norfolk	800	700	1,750
Mid Suffolk	800	2,000	1,500
Ipswich	800	800	1,250
Babergh	600	225	1,000
Other Scales			
60-minute travel area	2,400	700	3,100
CDCZ (90-minute travel area)	11,400	5,600	20,000
Wider Scales			
Norfolk	6,000	2,500	12,000
Suffolk	5,000	3,500	9,000
East	52,000	23,000	90,000
England	406,000	180,000	693,000

Source: BRES, 2019.

9.5.28 Compared with the national average, the immediate districts have a lower proportion of residents in professional and associated professional and technical occupations (31% compared with a national average of 36%) (Annual Population Survey, 2019). However, the proportion of residents in skilled manual trades (12%) is slightly above the national average (10%). The proportion of residents employed in personal service, sales and customer service occupations (11%) is also higher than the national

average (9%). These trends are similar, but more pronounced in East Suffolk, as shown in **Table 9.14**.

Table 9.14: Residents in employment by occupation

Occupational Group	East Suffolk	Immediate Districts	England
Managers, directors and senior officials.	10.3%	11.1%	11.1%
Professional occupations.	15.6%	17.6%	20.9%
Associate prof & tech occupations.	12.1%	13.3%	15.0%
Administrative and secretarial occupations.	11.5%	11.2%	10.1%
Skilled trades occupations.	12.8%	11.9%	9.9%
Caring, leisure and other service occupations.	11.7%	11.0%	8.9%
Sales and customer service occupations.	8.8%	7.6%	7.4%
Process, plant and machine operatives.	5.3%	5.6%	6.3%
Elementary occupations.	11.8%	10.7%	10.4%

Source: APS, 2018.

vii. Business and enterprise

9.5.29 There were approximately 36,600 active businesses in the immediate districts in 2018 (Business Counts, 2018). This figure includes both VAT-registered and PAYE-based enterprises. Business density, at 77 businesses per 1,000 working-age adult residents, is similar to the national average (79) shown in **Table 9.15**. Recent growth in the number of businesses in the immediate districts (12% overall) was below the national average (21%). However the rate has varied across districts. Growth in Ipswich was highest (19%), while growth in Great Yarmouth (6%), Babergh (7%), and Mid Suffolk (8%) was significantly slower.

9.5.30 There were 3,225 new business registrations in the immediate districts during 2017. This represents an annual rate of 6.8 new registrations per 1,000 working-age residents, which is below the national average (9.9). The latest data on business survival rates in the immediate districts shows that the proportion of new businesses surviving for at least three years (63%) is higher than the national average (59%).

Table 9.15: Business stock, density and growth

Area	Active Businesses 2018	Businesses per 1,000 Working-Age Residents	Growth in Businesses 2013–18
Districts			
East Suffolk	11,150	79	1,230
Great Yarmouth	3,600	61	210
South Norfolk	6,370	85	890
Mid Suffolk	5,430	91	400
Ipswich	5,400	62	850
Babergh	4,620	87	320
Wider Scales			
England	2,697,200	79	462,900

Source: Business Counts 2013; Business Counts 2018.

viii. Economic activity, unemployment and worklessness

9.5.31 Employment rates across the immediate districts (77%) are generally higher than the average across England (75.4%), in line with the rate across the East of England (78.0%) (Annual Population Survey, 2019). However there is some variation in working age employment rates across the immediate districts, ranging from an estimated 65.1% in Great Yarmouth to 79.2% in South Norfolk as shown in **Table 9.16**. However, these district-level figures are based on relatively small samples and should be treated with caution.

Table 9.16: Working Age Employment Rates (16–64)

Area	Residents in Employment	Working-Age Residents	Employment Rate
Districts			
Great Yarmouth	36,400	55,900	65.1%
South Norfolk	60,400	76,300	79.2%
East Suffolk	105,000	134,800	77.9%
Suffolk Coastal	*57,600*	*70,300*	*81.9%*
Waveney	*47,400*	*64,500*	*73.5%*
Mid Suffolk	45,300	58,400	77.6%
Ipswich	68,300	87,400	78.1%
Babergh	40,700	51,700	78.7%

Area	Residents in Employment	Working-Age Residents	Employment Rate
Wider Scales			
Norfolk	395,000	523,800	75.4%
Suffolk	343,500	437,700	78.5%
East	2,932,300	3,759,800	78.0%
England	26,169,200	34,728,600	75.4%

Source: Annual Population Survey (ONS, 2019)

9.5.32 Claimant count data (2019) (Department for Work and Pensions, 2019) is an experimental dataset that measures the number of people claiming Jobseeker's Allowance plus those who claim Universal Credit, and are required to seek work and be available for work. It is not considered to be a national statistic.

9.5.33 Claimant count rates across the immediate districts vary in comparison with the national average (2.8%) shown in **Table 9.17**. Rates in South Norfolk (1.4%), Mid Suffolk (1.4%) and Babergh (1.7%) are lower than the national average, whereas rates are relatively high in Ipswich (3.4%), East Suffolk (2.4%) and Great Yarmouth (4.6%). There are currently 3,335 claimants across the 60-minute travel area (1.8% of working age residents), and 24,270 (2.3% of working age residents) across the CDCZ.

Table 9.17: Claimant count data, September 2019

Area	Unemployed Claimants	% Working Age Residents
Local Wards		
Leiston	75	2.0%
Saxmundham	65	2.2%
Snape	10	1.1%
Yoxford	15	1.8%
Aldeburgh	10	0.8%
Districts		
Great Yarmouth.	10	4.6%
South Norfolk.	1,150	1.4%
East Suffolk.	3,385	2.4%
Suffolk Coastal.	960	1.3%
Waveney	2,435	3.7%
Mid Suffolk.	860	1.4%
Ipswich	3,000	3.4%

Area	Unemployed Claimants	% Working Age Residents
Babergh	885	1.7%
Other Scales		
60-minute travel area	3,335	1.8%
CDCZ (90-minute travel area)	24,270	2.3%
Wider Scales		
Norfolk	11,510	2.2%
Suffolk	10,040	2.3%
East	80,920	2.1%
England	978,890	2.8%

Source: ONS 2019.

ix. Income

9.5.34 The Annual Survey of Hours and Earnings (ASHE, 2019) provides median gross earnings data for full-time workers at local authority level. Data is available for both residents of a spatial area, and workers employed in each area. Resident-based data is shown in **Table 9.18**, and workplace data is in **Table 9.19**.

9.5.35 In 2019, median gross annual earnings for workers and residents across the immediate districts were generally below the East of England and England medians (£31,878 for residents and £30,345 for workers across the East of England versus and £30,661 for residents and £30,667 for workers across England).

9.5.36 Across most of the immediate districts, growth in residents' earnings over the ten years from 2009–2019 was higher than the average growth across England (17.3%). Median workplace-based earnings were below the national average (17.3%) in Great Yarmouth (15.8%), South Norfolk (13.6%), Ipswich (14.5%) and Babergh (10.8%).

Table 9.18: Residents – median earnings (full-time workers)

Area	2009	2019	% Growth
Districts			
Great Yarmouth.	£21,569	£25,943	20.3%
South Norfolk.	£25,206	£30,396	20.6%
East Suffolk.	#	£29,666	#
Suffolk Coastal.	*£27,215*	#	#

Area	2009	2019	% Growth
Waveney	*£24,370*	#	#
Mid Suffolk.	£24,999	£29,401	17.6%
Ipswich	£22,606	£28,162	24.6%
Babergh	£25,659	£31,722	23.6%
Wider Scales			
East	£27,303	£31,878	16.8%
England	£26,145	£30,661	17.3%

 # - Figures suppressed within ASHE. Source: ASHE 2009; ASHE 2019

Table 9.19: Workplace – median earnings (full-time workers), 2018

Area	2009	2019	% Growth
Districts			
Great Yarmouth	£24,559	£28,439	15.8%
South Norfolk	£25,379	£28,818	13.6%
East Suffolk	#	£29,950	#
*Suffolk Coastal**	*£27,881*	#	#
*Waveney**	*£22,940*	#	#
Mid Suffolk	£22,143	£28,908	30.6%
Ipswich	£23,468	£26,867	14.5%
Babergh	£23,065	£25,567	10.8%
Wider Scales			
East	£25,500	£30,345	19.0%
England	£26,133	£30,667	17.3%

 # - Figures suppressed within ASHE. Source: ASHE, 2009; ASHE, 2019.

x. Skills and qualifications

9.5.37 The proportion of working age residents in the immediate districts with at least Level 2 qualifications (GCSE qualification at Grade C (or equivalent) or higher) (84%) is lower than the proportions across the East of England (86%) and England as a whole (87%) shown in **Table 9.20**. There are variations across the districts, with a relatively low proportion of Great Yarmouth residents with at least Level 2 qualifications (77%) and higher proportions in Mid Suffolk (91%) and South Norfolk (also 91%).

9.5.38 The proportion of working age residents in the immediate districts with at least Level 3 qualifications (A Level qualification (or equivalent) or higher)

(57%) is also lower than the proportions across the East of England (62%) and England (65%).

9.5.39 Across England, 44% of working-age residents have Level 4 (degree level (or equivalent) or higher) qualifications – this is higher than the proportions across the East of England (39%) and the immediate districts (34%).

9.5.40 Across all spatial scales, proportions of working-age residents with Level 2, 3, and 4 qualifications or higher has increased over the 10 years 2008–2018.

Table 9.20: Qualifications of working age residents (16–64), 2008 and 2018

Area	% Qualified at Level 2+ (2008)	% Qualified at Level 3+ (2008)	% Qualified at Level 4+ (2008)	% Qualified at Level 2+ (2018)	% Qualified at Level 3+ (2018)	% Qualified at Level 4+ (2018)
Districts						
Great Yarmouth	68%	35%	12%	77%	49%	12%
South Norfolk	79%	55%	27%	91%	64%	43%
East Suffolk	77%	49%	21%	85%	53%	35%
Suffolk Coasta.	*80%*	*52%*	*25%*	*85%*	*55%*	*40%*
Waveney	*73%*	*46%*	*16%*	*85%*	*50%*	*29%*
Mid Suffolk	73%	46%	24%	91%	68%	44%
Ipswich	70%	45%	17%	82%	55%	31%
Babergh	74%	44%	24%	84%	61%	34%
Other Scales						
East	76%	51%	28%	86%	62%	39%
England	78%	55%	32%	87%	67%	44%

Source: Annual Population Survey, 2008; APS 2018.

9.5.41 Data on GCSE exam attainment for the 2017/18 academic year is available at county level (Department for Education, 2018), as shown in **Table 9.21**. Attainment in Suffolk and Norfolk is generally below East of England averages in terms of the proportion of pupils gaining nine to five or nine to four passes in Maths and English. Attainment in Suffolk, Norfolk and the East of England is generally higher than the average across England as a whole, with the exception of the proportion of pupils in Norfolk gaining nine to five passes in Maths and English (39.3% compared to 39.9% across England as a whole).

Table 9.21: GCSE exam attainment levels

Area	% Pupils Gaining 9–5 Pass in Maths and English	% Pupils Gaining 9–4 Pass in Maths and English
Suffolk	41.1%	63.8%
Norfolk	39.3%	62.0%
East	43.6%	65.1%
England	39.9%	59.1%

Source: Department for Education, 2018.

xi. Tourist economy

9.5.42 SZC Co. has been working with stakeholders to understand the value and volume of tourism in the area. Tourism is notoriously difficult to define, and is inherently flexible – its economic effects are influenced by environmental and economic characteristics, seasonality and many other variables.

9.5.43 An Economic Impact Report has been produced for the Destination Management Organisation (DMO) by Destination Research (2018) (Ref 9.20) for the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB). It presents information on visitor numbers, expenditure, and an estimate of the number of jobs supported by this and indirect/induced expenditure in different sectors. The report finds that in 2017 the Suffolk Coast and Heaths AONB:

- attracted over 4.1 million trips, of which over 90% were day trips;
- generated over £164 million of direct spend, and over £45 million indirect/induced value; and
- supported 3,400 full-time equivalent jobs.

9.5.44 The same assessment was also undertaken at (Suffolk) county-level in 2017 which found that Suffolk (Ref 9.21):

- attracted over 35 million trips, of which 95% were day trips;
- generated over £1.4bn of direct spend, and over £595m indirect/induced value; and
- supported over 31,000 full-time equivalent jobs.

9.5.45 Public datasets may also be used to estimate the number of jobs in 'tourism' sectors (Ref 9.22). On this basis, Suffolk (county) has around

34,100 tourism-sector jobs (full and part time), making up 10.1% of all jobs in Suffolk in 2018. This is set out in **Table 9.22**.

Table 9.22: Jobs in tourist sectors

Area	Tourist Sector Jobs	All Jobs	% Tourist Sector Jobs
Local Wards			
Leiston	300	2,500	12.0%
Saxmundham	200	2,000	10.0%
Snape	100	350	28.6%
Yoxford	200	800	25.0%
Aldeburgh	600	1,500	40.0%
Districts			
Great Yarmouth	7,700	38,000	20.3%
South Norfolk	4,400	57,000	7.7%
East Suffolk	11,600	96,000	12.1%
*Suffolk Coastal**	6,100	54,000	11.3%
*Waveney**	5,500	42,000	13.1%
Mid Suffolk	2,800	38,000	7.4%
Ipswich	6,300	73,000	8.6%
Babergh	3,500	34,000	10.3%
Other Scales			
Norfolk	43,600	388,000	11.2%
Suffolk	34,100	339,000	10.1%
England	2,845,900	26,842,000	10.6%
Norfolk	43,600	388,000	11.2%

Source: BRES, 2019.

xii. Land use and agricultural economy

9.5.46 Agricultural land accounts for a total of approximately 330,000ha in Suffolk, and an estimated 10,000 jobs in 2018 (BRES, 2019).

Accommodation

9.5.47 A detailed review of accommodation stock, including overall stock, potential change in stock since the 2011 Census, occupancy, vacancy, turnover and capacity assessments are set out in **Appendix 9D** of this volume.

9.5.48 The following section summarises the potential capacity of accommodation, drawing on a more detailed assessment in **Appendix 9D** of this volume. This has involved careful consideration of the potential scale of accommodation available in four sectors:

- tourist accommodation;
- PRS;
- owner-occupied sector; and
- latent accommodation: accommodation that is either new or not currently included in records of tourist or private rented accommodation, because it has been out of use, or has not sought registration.

Tourist sector

Overall stock

9.5.49 There is a large supply of tourist sector accommodation across the 60-minute area, most of which is concentrated in urban areas or within coastal areas. The stock of accommodation in the area is diverse in terms of the type of service provided and the price per night/booking.

9.5.50 **Table 9.23** sets out the stock of tourist accommodation (by bedroom) using data provided by Visit East Anglia (2012) (Ref 9.23).

Table 9.23: Bedspaces in tourist accommodation

	Total	Serviced	Non-serviced		
		Hotels and Similar	Self-Catering	Caravan and Campsites	Other e.g. Holiday Parks, Hostels
Local Wards					
Leiston	**333**	29	9	295	–
Saxmundham	**423**	29	79	315	–
Snape	**411**	15	151	45	200
Yoxford	**605**	131	197	277	–
Aldeburgh	**1,691**	341	806	544	–
Districts					
Great Yarmouth	**19,003**	3,752	380	4,916	9,955
South Norfolk	**1,533**	949	332	176	76

	Total	Serviced	Non-serviced		
		Hotels and Similar	Self-Catering	Caravan and Campsites	Other e.g. Holiday Parks, Hostels
East Suffolk	**19,670**	2,526	3,644	4,151	9,350
*Suffolk Coastal**	***10,057***	*1,287*	*2,225*	*2,266*	*4,279*
*Waveney**	***9,613***	*1,239*	*1,419*	*1,885*	*5,071*
Mid Suffolk.	**1,393**	800	393	200	–
Ipswich	**986**	986	–	–	–
Babergh	**1,550**	1,167	350	33	–
Other Scales					
60-minute Area.	**26,276**	6,255	4,300	5,645	10,076

Source: Visit East Anglia, 2012.

9.5.51 Data is also produced at a local authority scale by Visit Britain as part of their Accommodation Stock Audit (latest data 2016) (Ref 9.24). While this cannot be used to inform the Gravity Model (which requires local-level data to run), it provides some context for the wider stock by sector. **Table 9.24** summarises the overall stock by sector (bedspaces) for Suffolk (county) and East Suffolk (district). It should be noted that due to different categorisation of accommodation, the two datasets are not directly comparable.

Table 9.24: Bedspaces in tourist sector accommodation

	Total	Serviced	Non-serviced		
		Hotels and Similar	Holiday Dwellings	Tourist Campsites	Other Collective Accommodation
East Suffolk (district)	**11,005**	4,168	4,262	2,512	63
Suffolk (county)	**20,620**	12,233	5,302	2,989	96

Source: Visit Britain, 2016.

Availability and affordability

9.5.52 Room occupancy rates for tourist accommodation are produced monthly by Visit England at a regional scale through the England Occupancy Survey (2019) (Ref 9.25). A review of this information for the East of England region from 2016–2019 suggests occupancy ranges from 63% in the Winter (January) to 85% in the peak of Summer (July/August). Occupancy tends to exceed 80% for four to five months of the year.

9.5.53 Applied to the above datasets, this suggests that:

- there may be between 1,600 (peak) up to 7,300 (off peak) unoccupied bedspaces in ESC depending on the data sources and assumptions; and

- there may be between 3,100 (peak) and 9,700 (off-peak) unoccupied bedspaces in the 60-minute area depending on the data sources and assumptions.

9.5.54 A significant amount of tourist accommodation would not be affordable to Sizewell C construction workers. By sector, SZC Co. has assumed that:

- 85% of serviced accommodation would not be affordable for workers;

- in most areas, 90% of self-catering accommodation would be affordable to workers (though SZC Co. note through engagement with The Suffolk Coast DMO that there is likely to be considerable local variation in price between areas); and

- while all caravan accommodation is likely to be affordable, planning restrictions for the year-round use of caravans for construction workers reduces the potential for availability – engagement with local authorities suggests this could reduce availability to workers by 50%.

9.5.55 **Table 9.25** applies these discounts to the overall stock identified in **Table 9.23**, with the effect of reducing the overall stock that is anticipated to be available and affordable to workers by over 60%.

Table 9.25: Bedspaces in tourist accommodation

Geography	Total	Serviced	Non-serviced		
		Hotels and Similar	Self-Catering	Caravan and Campsites	Other e.g. Holiday Parks, Hostels
Local Wards					
Leiston	160	4	8	148	–
Saxmundham	233	4	71	158	–
Snape	161	2	136	23	–
Yoxford	335	20	177	139	–
Aldeburgh	1,049	51	725	272	–
Districts					
Great Yarmouth	3,363	563	342	2,458	–
South Norfolk	529	142	299	88	–

Geography	Total	Serviced	Non-serviced		
		Hotels and Similar	Self-Catering	Caravan and Campsites	Other e.g. Holiday Parks, Hostels
East Suffolk	5,734	379	3,280	2,076	–
*Suffolk Coastal**	3,329	193	2,003	1,133	–
*Waveney**	2,405	186	1,277	943	–
Mid Suffolk.	574	120	354	100	–
Ipswich	148	148	–	–	–
Babergh	507	175	315	17	–
Other Scales					
60-minute area	7,631	938	3,870	2,823	–

Source: Visit East Anglia, 2012.

Private rented sector

9.5.56 The 2011 Census identifies that there are over 99,000 private rented bedrooms in the 60-minute area, within 42,000 homes. The distribution of these bedspaces across the area varies substantially, with more and a greater proportion (of all bedspaces) in urban areas.

9.5.57 **Table 9.26** sets out the total number of private rented bedspaces within the 60-minute area and East Suffolk district as at the 2011 Census.

Table 9.26: Homes and bedrooms in the private rented sector based on 2011 census data

Geography	Total Homes	Total Rooms
Local Wards		
Leiston	478	1,124
Saxmundham	289	728
Snape	132	351
Yoxford	132	326
Aldeburgh	216	543
Districts		
Great Yarmouth	7,605	17,101
South Norfolk	6,752	16,752
East Suffolk	16,295	38,755
*Suffolk Coastal**	*8,065*	*19,723*

Geography	Total Homes	Total Rooms
*Waveney**	*8,230*	*19,032*
Mid Suffolk.	5,157	12,930
Ipswich	12,092	26,732
Babergh	5,451	13,405
Other Scales		
60-minute area	42,030	99,033

Source: Census, 2011.

9.5.58 The PRS has changed substantially since 2011 Census data was collected. By applying the increases evidenced above from the English Housing Survey (Ref 9.26) and relevant Strategic Housing Market Assessments, it is reasonable to assume that the 2011 Census underestimates the stock of PRS homes and rooms across East Suffolk, and the 60-minute area by up to 11,600 and 29,700 bedrooms respectively.

Vacancy

9.5.59 The Ipswich Housing Market Area Strategic Housing Market Area Update (2019) (Ref 9.27) states that the vacancy rate in Suffolk Coastal is around 8.3%. This is defined using 2011 Census data for homes that are empty and those that are used as second homes. A vacancy rate of 6.9% is presented for Waveney within the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Volume 2 (2017) (Ref 9.28).

9.5.60 However, there is a significant difference between tenures especially where the market requires a certain level of vacancy to operate efficiently. Average (national) vacancy rates in the PRS over the last ten years, as recorded by the English Housing Survey, suggest vacancy rates of around 10.3% – this includes properties that are empty or available to let, or away from the market for the short, medium, or long-term.

Turnover/Churn

9.5.61 The English Housing Survey sets out that average annual churn rate in the PRS (households moving within, in or out of the sector in a given year) averages at 31.8% over the last ten years in England. This equates to 2.7% of all properties turning over in each month.

9.5.62 Evidence from the 2011 Census[2] indicates an annual churn of around 29% of private rented households in Suffolk Coastal and 27% in Waveney (those households in the districts in the PRS who moved in the last year), which appears about average for districts in the UK.

9.5.63 In Suffolk Coastal, around 8.2% of PRS households moved into dwellings in the district in 2011, and in Waveney around 6% of PRS households moved into dwellings in the district in 2011.

9.5.64 Average turnover of the PRS in East Suffolk wards in 2011 (Census) was around 35% (or 2.8% per month).

'Frictional Vacancy'

9.5.65 The level of vacancy can be combined with the average level of turnover to estimate the 'frictional vacancy'. This is the level of vacancy that the sector is assumed to need to operate effectively at any point in time. This is based on the assumption that frequent movements within and in/out of this sector need to be facilitated by a level of on-going vacancy. Overall, in East Suffolk, annual turnover is around 35%, and so monthly turnover is likely to be around 2.8% on average (see above). Vacancy in the PRS is estimated at between 6.9% and 10.3% (see above). Subtracting the monthly turnover rate from the overall vacancy gives an average frictional vacancy rate for East Suffolk of between 4.1% and 7.5%.

9.5.66 This level of frictional vacancy can be estimated at a local level (i.e. ward), and provides a benchmark for the level of on-going vacancy that the sector has at any point in time.

Owner-occupied sector

9.5.67 The 2011 Census identifies that there were 134,427 family homes (3+ bedrooms) in the owner-occupied sector across the 60-minute area in 2011. Since then the private housing sector has grown by approximately 4% in Suffolk, so this is considered an under-estimate.

9.5.68 **Table 9.27** sets out the total number of family-size (3+ bedroom) owner-occupied homes in 2011 (Census) across the relevant study areas:

[2] This data only refers to 'wholly moving households' i.e. one where all members of the household have moved from the same address. A partly moving household is where one or more members of the household have moved in the last year but not all members have moved from the same address. Partly moving households in the PRS sector accounted for an additional 8.7% of all PRS households. Overall, 4.4% of all households in Suffolk Coastal were formed in 2011 as a result of partially moving. These are additional to wholly moving households.

Table 9.27: Homes and rooms in family-size (3+ bedroom) owner-occupied homes

Geography	Total Homes
Local Wards	
Leiston	1,339
Saxmundham	1,107
Snape	518
Yoxford	520
Aldeburgh	952
Districts	
Great Yarmouth.	18,719
South Norfolk.	31,191
East Suffolk.	55,858
*Suffolk Coastal**	30,240
*Waveney**	25,618
Mid Suffolk.	23,527
Ipswich	25,869
Babergh	20,968
Other Scales	
60-minute area.	134,427

Source: Census, 2011.

Latent accommodation sector

9.5.69 Latent accommodation includes 'un-rated' tourist accommodation, rooms for let in private homes, currently empty homes, and accommodation new to the market each year.

9.5.70 Based on 2011 Census data for occupancy rating (using a conservative assessment – considering that any home with a '+2' occupancy rating has at least one spare bedroom), there were over 1,000 spare bedrooms in Leiston alone. **Table 9.28** sets out the number of empty bedrooms across the study areas in 2011 by tenure.

Table 9.28: Estimated unoccupied bedrooms by tenure based on occupancy rate

Geography	Owner-Occupied (Bedrooms)	Social Rented (Bedrooms)	Private Rented (Bedrooms)
Local Wards			
Leiston	830	37	81
Saxmundham	875	81	109
Snape	865	51	80
Yoxford	407	20	51
Aldeburgh	445	11	42
Districts			
Great Yarmouth	11,967	760	1,030
South Norfolk	22,228	594	1,787
East Suffolk	39,745	1,550	3,407
*Suffolk Coastal**	*22,372*	*678*	*1,929*
*Waveney**	*17,373*	*872*	*1,478*
Mid Suffolk	16,622	488	1,373
Ipswich	15,735	1,467	1,693
Babergh	15,100	629	1,304

Source: Census, 2011.

9.5.71 The Ministry of Housing, Communities and Local Government Live Table 615 (ONS, 2019) identifies that as at October 2018 there are 3,257 vacant properties in ESC (SCDC and WDC). Of these, 1,130 are 'long-term' vacants – meaning that these dwellings have been unoccupied and substantially unfurnished for over six months.

9.5.72 Waveney has 73 local authority-owned vacant properties, and across East Suffolk there are 56 general needs vacant properties owned by Private Registered Providers.

xiii. Education

9.5.73 This section discusses primary and secondary education services. Information is included on current pupil numbers in local schools and the numbers of surplus school places within the 60-minute travel area.

9.5.74 Information is also included at the end of the section on other education provision, including pre-school and nursery provision and post-16 education.

Primary education

9.5.75 **Table 9.29** sets out data on pupil numbers and school capacities for all maintained schools within the 60-minute travel area. In total there were 22,434 pupils on roll in 121 primary schools within this area in the school year 2018/19 (DfE, 2019). Based on Planned Admission Numbers, total capacity of these schools is 25,416 places. There were 3,123 surplus places in the area – equivalent to 12% of existing primary school capacity.

9.5.76 Data provided by SCC (October 2019) (Ref 9.29) sets out school capacity and surplus data forecast across Suffolk in 2023/24. **Table 9.29** also shows forecast surpluses in study areas within SCC (based on surplus compared to 100% capacity). Data is included for all schools other than Witnesham Primary School (East Suffolk) and Somersham Primary school (Mid Suffolk).

9.5.77 Comparing SCC 2023/24 forecasts to Annual School Census data shows growth in pupil numbers at Leiston ward primary schools of 142 pupils (102 due to demographic growth, and 40 related to housing growth). It is noted that this does not include additional capacity provided by planning obligations related to new housing development.

Table 9.29: Primary school capacity

Geography	Net Capacity (all year groups)	Pupils on Roll (January 2019)	Surplus Places	% Surplus Capacity	Net Capacity (SCC)	Forecast pupils on Roll 2023/24 (SCC)	Forecast Surplus Places 2023/24 (SCC)	Forecast % Surplus Capacity 2023/24 (SCC)
Local Wards								
Leiston	525	391	165	26%	560	533	27	5%
Saxmundham	483	445	38	8%	483	460	23	5%
Snape	175	145	30	17%	175	173	2	1%
Yoxford	175	104	71	41%	173	142	31	18%
Aldeburgh	105	103	2	0%	105	104	2	1%
Districts (geographic areas within 60-minute area)								
Great Yarmouth.	840	789	51	6%				
South Norfolk.	2,828	2,418	419	14%				
East Suffolk.	15,650	13,718	2,014	12%	15,876	13,954	1,922	12%
Mid Suffolk.	4,411	3,917	537	11%	4,363	4,291	72	2%
Ipswich	840	836	6	0%	832	861	-29	-3%
Babergh	182	173	9	5%	182	194	-12	-7%
Other Scales								
60-minute area.	25,416	22,434	3,123	12%				

Sources: Department for Education, 2019; SCC Directory of Schools in Suffolk for the 2020/21 school year (Ref 9.30); Norfolk County Council Primary and Infant Schools in Norfolk 2019/20 (Ref 9.31).

9.5.78 Surplus places are unevenly distributed across local primary schools. Some schools have significant numbers of surplus places; others are operating close to or above current capacity.

9.5.79 SCC's Education and Learning Infrastructure Plan (Version 3.0) (2017) (Ref 9.32) considers where there would be a need for more school places in Suffolk in the future. The document sets out expected growth in primary school numbers of 4% over the five years following the date the report was published (2017). Within this growth 'hotspots' are identified in Ipswich, north Lowestoft and Forest Heath.

9.5.80 Based on ONS 2014-based sub-national population projections, the report projects that the rise in demand for primary school places occurring at the time of reporting is expected to level out and then decline towards the mid-2020s.

9.5.81 The report lists a number of proposed school expansions and new schools to meet demand for spaces, including the following across the 60-minute area:

- Mid Suffolk – Potential expansion of Bosmere Primary, Chilton Primary, Trinity CEVA, and St Peter & St Paul, and potential new schools in Stowmarket (Cedars Park and Chilton Leys).

- East Suffolk – expansion of Sir Robert Hitchams CEVC Primary, Saxmundham Primary, Rendlesham Community Primary, Martlesham Primary, Cedarwood Primary, Oulton Broad Primary (if required), and potential new schools at Martlesham (Adastral Park), Felixstowe/Trimley St Martin and St Marys, Wood Meadow and Lake Lothing.

9.5.82 Norfolk County Council's Children's Services Committee published school place planning information in March 2019 (Ref 9.33) relating to the need to meet demand generated by Sustainable Urban Extensions across the County. Within the 60-minute travel area, the following primary school expansions and new schools are proposed to meet projected demand for places:

- South Norfolk – potential new two or three form entry primary school in Long Stratton.

Secondary education

9.5.83 **Table 9.30** sets out data on pupil numbers and school capacities for all secondary schools within the 60-minute travel area. There are 22 secondary schools within the 60-minute travel area. Total capacity in these

schools is 19,817 places (based on Suffolk and Norfolk County Councils School Admission Documents). Pupil numbers in these schools totalled 17,596 in January 2019 based on Department for Education Annual School Census data. There are 2,453 surplus places in the area, representing around 12% of existing capacity.

9.5.84 Data provided by SCC (October 2019) (Ref 9.29) sets out school capacity and surplus data forecast across Suffolk in 2023/24. **Table 9.30** shows forecast surpluses (based on surplus compared to 100% capacity, for study areas in SCC). It is noted that this does not include additional capacity provided by planning obligations related to new housing development.

Table 9.30: Secondary school capacity

Geography	Net Capacity (all year groups)	Pupils on Roll (January 2019)	Surplus Places	% Surplus Capacity	Net Capacity (SCC)	Forecast pupils on Roll 2023/24 (SCC)	Forecast Surplus Places 2023/24 (SCC)	Forecast % Surplus Capacity 2023/24 (SCC)
Local Wards								
Leiston	560	394	166	30%	617	545	72	12%
Saxmundham	600	474	126	27%	572	555	17	3%
Snape	--	--	--	--	--	--	--	--
Yoxford	--	--	--	--	--	--	--	--
Aldeburgh	--	--	--	--	--	--	--	--
Districts (geographic areas within 60-minute area)								
Great Yarmouth.	--	--	--	--	--	--	--	--
South Norfolk.	2,120	1,644	476	22%	--	--	--	--
East Suffolk.	10,766	9,648	1,118	11%	11,088	10,527	139	1%
Mid Suffolk.	3,961	3,426	535	16%	3,891	3,792	94	2%
Ipswich	2,470	2,317	153	6%	2,440	2,432	8	0%
Babergh	600	561	39	7%	600	672	-72	-12%
Other Scales								
60-minute area.	19,917	17,596	2,453	12%	--	--	--	--

Sources: Department for Education, 2019; SCC Directory of Schools in Suffolk for the 2020/21 school year; Norfolk County Council Secondary Schools in Norfolk 2019/20 (Ref 9.34).

9.5.85 Surplus secondary school places are unevenly distributed across the 60-minute area. There are two secondary schools within the local ward area –

Alde Valley School and SET Saxmundham Free School – both of which have a large number of surplus places (30% surplus capacity). Across the secondary schools in East Suffolk there is 11% surplus capacity (equivalent to 1,153 surplus places). There is less surplus secondary capacity in the geographic areas of Ipswich (6% surplus across Copleston High School and St Alban's Catholic High School), and Babergh (7% surplus at Holbrook Academy) that are within the 60-minute area.

Forecast pupil rolls & future development

9.5.86 SCC's Education and Learning Infrastructure Plan (Ref 9.32) considers where there would be a need for more school places in Suffolk in the future. The document sets out expected growth in secondary school numbers of 13% over the five years following the date the report was published (2017). Within this growth, 'hotspots' are identified in terms of areas expected to see the most pressure for additional secondary places – including areas within the 60-minute area – Babergh, the area south of Lowestoft, and Ipswich, particularly to the east of the town.

9.5.87 The report highlights that "*based on ONS 2016-based sub-national population projections, demand for secondary school places is expected to rise from 2016, and steadily thereafter for the next ten years*" and that "*as the ONS projections are trend-based, demand is likely to be higher, once population increases driven by new housing developments and migration are taken into account*" (Ref 9.32).

9.5.88 The report lists a number of proposed school expansions to meet demand for spaces, including the following across the 60-minute area:

- Babergh (Holbrook) – places at Holbrook Academy to be monitored, places limited and combined growth in the wider area may lead to the need to expand the school.
- Ipswich (East) – Copleston High School is expected to see a rise in pupil numbers and a project is underway to consider expansion options for the school.
- Mid Suffolk – potential increase in secondary provision in Debenham.
- East Suffolk – potential new secondary school or expansion of existing school at Martlesham (Adastral Park).

9.5.89 Norfolk County Council's Children's Services Committee published school place planning information in March 2019 (Ref 9.33) relating to the need to meet demand generated by Sustainable Urban Extensions across the

county. Within the 60-minute area, the following primary school expansions and new schools are proposed to meet projected demand for places:

- South Norfolk – potential expansion of Long Stratton High.

Pre-school provision

9.5.90 Local authorities have a statutory duty to secure sufficient childcare for children from birth to 14 (or 18 for disabled children), and produce reporting, measuring the demand for, and supply of, childcare, identifying gaps in the market and how to address any shortfall.

9.5.91 SCC's most recent Childcare Sufficiency Assessment for Suffolk was produced in 2019 (Ref 9.35). It assessed information about the current and projected supply and demand of childcare for particular age ranges of children, and the affordability, accessibility and quality of provision. This work is undertaken by gathering data on the number of places available, take up of places and population. This report sets out that:

- In total, there are 41,444 children under the age of five living in Suffolk. These children may require early years childcare.
- In total, there are 776 Office for Standards in Education, Children's Services and Skills (Ofsted) registered childcare providers in Suffolk. 598 are in receipt of early years education funding and 178 offer childcare funded directly from the parent/carer.
- Demand for funded two-year-old places is greater in areas where there are higher levels of deprivation.

9.5.92 The Childcare Sufficiency Assessment considers demand and supply on a 'cluster' basis. For the Framlingham and Leiston cluster (including Aldeburgh, Framlingham, Hacheston, Leiston, Peasenhall and Yoxford, Saxmundham and Wickham Market), there is currently a surplus of 66 available places (or 102 with migration taken into account), though overall for Suffolk there is a net deficit of over 3,000 places. A 'place' refers to a 15-hour (per week) slot.

9.5.93 Norfolk County Council's Childcare Sufficiency Assessment 2018 (Ref 9.36) sets out overall trends across the county, plus 36 detailed area profiles.

9.5.94 The following overall trends are identified:

- Although Norfolk's overall population is growing, the number of early years children is reducing.

- Across the county there is sufficient zero to five childcare to meet demand, but this varies by area.
- The quality of early years provision is high, and costs are below national averages.

9.5.95 The following Norfolk Children's Centre Areas fall within the 60-minute area:

- Village Green – there are sufficient two, three and four year old funded places across the area with 170 places available at any one time for 152 eligible children.
- Long Stratton – there are sufficient two, three and four year old funded places across the area with 253 places available at any one time for 193 eligible children.
- Diss – there are sufficient two, three and four year old funded places across the area with 362 places available at any one time for 225 eligible children.
- Acle Marshes – there are sufficient two, three and four year old funded places across the area with 473 places available at any one time for 269 eligible children.
- Harleston and Loddon – there are sufficient two, three and four year old funded places across the area with 490 places available at any one time for 295 eligible children.
- Seagulls and Gorleston and Hopton – there are sufficient two, three and four year old funded places across the area with 774 places available at any one time for 400 eligible children.

Post-16 provision

9.5.96 There are 30 maintained schools, academies and colleges across Suffolk, and 38 across Norfolk offering provision for 16-18 year olds.

9.5.97 The closest provider of 16–18 year old education to the site is Alde Valley School in Leiston.

xiv. Other community facilities

9.5.98 Within the 60-minute travel area there are 20 libraries operated by SCC and Norfolk County Councils, listed in **Table 9.31**. The closest libraries to the

site are in Leiston, Saxmundham and Aldeburgh. There are also libraries in Wickham Market and Framlingham.

9.5.99 There are a large number of village and community halls across the area. SCDC (now ESC) carried out an audit of community and village halls across the district in 2014 (SCDC Built Facilities Assessment, November 2014) (Ref 9.37). It found there are 113 village and community halls across the district, that current levels of provision are adequate to meet existing needs, and that the whole population of (what was) SCDC are within 10 minutes' drive of their nearest village or community hall (96.4% are within 10 minutes cycle, and 72.2% are within ten minutes' walk of their nearest community hall).

9.5.100 The closest halls to the site are in Leiston. These include:

- Home Guard Hall (Victory Road);
- Leiston Community Centre (King George's Avenue); and
- Women's Institute Hall (John Street).

Table 9.31: Libraries and community centres

Geography	Libraries	Community Centres
Local Wards		
Leiston	1	4
Saxmundham	1	3
Snape	--	4
Yoxford	--	5
Aldeburgh	1	3
Districts (geographic areas within 60-minute area)		
Great Yarmouth.	--	--
South Norfolk.	2	--
East Suffolk.	13	At least 113*
Mid Suffolk.	5	--
Ipswich	--	--
Babergh	--	--
Other Scales		
60-minute area.	20	At least 113*

Source: Suffolk and Norfolk County Councils, 2019.
**SCDC area only.*

xv. Sport and leisure facilities

9.5.101 **Appendix 9E** of this volume sets out a detailed baseline for sports and recreation facilities across the study area, and within local communities using published information from local authority assessments and Sport England databases.

9.5.102 It sets out the number, location and types of facilities, and estimates existing deficits, and surplus from modelling undertaken by the local authorities.

xvi. Crime and community safety

9.5.103 Suffolk experiences slightly lower rates of crime and disorder compared to the national average (71.5 recorded crimes per 1,000 people compared to 87 recorded crimes per 1,000 people in England) (Police.uk, 2019); (ONS Home Office Police Recorded Crime, 2019).

9.5.104 Crime and fear of crime are highest in the more urban areas within the county (with greater population) and often coincide with areas of relative deprivation.

9.5.105 Home Office statistics on numbers of recorded offences in the immediate counties and districts are presented in **Table 9.32** based on the number of recorded crimes during the 12-month period to December 2018.

9.5.106 There were 54,124 recorded offences in Suffolk during the 12 months to December 2018. Adjusting for the county's resident population (using ONS mid-2017 population estimates), this represents an annual crime rate of 71.5 offences per 1,000 population. This is below the regional (East of England) average of 75.9 crimes per 1,000 residents. Recorded crime rates are particularly low in (the former) SCDC (47.7 recorded crimes per 1,000 population), but are higher in WDC (82.5).

9.5.107 Data is also available on a neighbourhood-level for smaller areas for a 12-month period up to the end of July 2019. Neighbourhood policing areas are generally at a higher spatial scale than wards. This data has been analysed over 12 months to give estimates of comparative crime rates for the areas closest to the main development site.

Table 9.32: Recorded offences 12 Months to 2018

Geography	Recorded Crime	ONS Mid-year Population Estimates (2017)	Recorded Crime per 1,000 Population
Local Neighbourhoods			
Leiston[3]	1,364	26,398	51.6
Districts/Community Safety Partnerships (12 months to March 2018)			
East Suffolk	15,880	246,913	64.3
*Suffolk Coastal**	6,158	129,016	47.7
*Waveney**	9,722	117,897	82.5
Great Yarmouth	9,438	99,417	94.9
South Norfolk	5,268	135,471	38.9
Ipswich	16,089	138,480	116.2
Wider Scales (12 months to December 2018)			
Suffolk	54,124	757,000	71.5

Source: Home Office Police Recorded Crime by PFA (ONS, 2019) and Police.uk (accessed October 2019). Crime rates per 1,000 population are calculated using ONS mid-2017 population estimates. Number of recorded offences is for the 12 month period to 30 December 2018.

xvii. Deprivation and social inequality

9.5.108 The national Indices of Multiple Deprivation (ONS, 2019) highlight levels of deprivation across each local authority area, indicated relative to all other English local authorities. ESC is ranked the 143 most deprived of 317 local authorities in England. Average levels of deprivation are much higher in Great Yarmouth (20) and Ipswich (71), but lower in South Norfolk (235), Babergh (218) and Mid Suffolk (237).

9.5.109 **Figure 9.4** shows spatial areas of deprivation at Lower-level Super Output Area level – this highlights that areas in Ipswich, Lowestoft and Great Yarmouth are within the 10% and 20% most deprived areas in England.

9.5.110 A more detailed analysis of the sub-domains of the Indices of Multiple Deprivation – which explores different aspects of deprivation – identifies particular issues in relation to education, skills and training deprivation in East Suffolk, Great Yarmouth and Ipswich.

[3] Leiston Neighbourhood Policing area is approximately equivalent to the following 2011 Census ward areas: Leiston, Aldeburgh, Saxmundham, Snape, Earl Soham, Hacheston and Framlingham

Suffolk "hidden needs"

9.5.111 The Suffolk Community Foundation's report Hidden Needs in Suffolk: Five Years On (2011–2016) (Ref 9.38) reviews the degree of deprivation and disadvantage in both urban and rural areas in Suffolk, reassessing original analysis included in an earlier report published in 2011. It identifies that:

- over 83,000 people in Suffolk live in income deprivation and have limited access to necessities, suggesting that inequality is still a big problem in Suffolk, this figure having increased by 5,000 people over the last five years;
- the proportion of Suffolk's population over the age of 65 is steadily increasing at a faster rate than the national average, leading to reduced economic activity, which may have adverse effects on the county's economy;
- the impact of international immigration on population growth and age structure has been limited when compared to the effect immigration had when the first report was published;
- rural areas of Suffolk are known to experience less deprivation, but can often be underrepresented and played down by area statistics – people in rural areas are said to need 15 to 25% more income than their urban counterparts to enjoy the same standard of living, suggesting that individuals on equal incomes may experience more deprivation in rural areas compared to urban areas;
- in total 28% of all citizens living in income deprivation reside in rural areas. In addition to this, 36% of adults with disabilities or long-term illnesses and 37% of adults in Suffolk with no qualifications live in rural areas, fuelling inequality across the county;
- rural Suffolk is also subject to various geographical barriers to services such as large road distances from schools, supermarkets and GPs. Since 2008, there has also been a decline in rural access to banks, youth centres and bus services;
- rural Suffolk has also experienced deprivations in communication, with over 50% of parishes branding local broadband as *"poor",* limiting children's access to educational services and reducing the sustainability of local businesses;

- a Social Mobility Index introduced in 2016 suggests that social mobility tends to be high in the earlier years of provision, but mobility decreases as individuals approach adulthood. Ipswich and Waveney have been named in the bottom 10% of districts in England for social mobility while almost 70% of Suffolk neighbourhoods dropped position in the Indices of Multiple Deprivation rankings by at least a decile over the study period, suggesting that social mobility can be improved much further; and

- job opportunities in the entire Suffolk region are consistently better than the Eastern region (on average), leading to unemployment rates lower than national averages.

b) Future baseline

i. Population and household projections

9.5.112 The latest official 2016-based sub-national population projections for local authority areas were published by the ONS in May 2018. These provide trend-based projections for the twenty five year period from 2016 to 2041, although the focus here is on projected population change over the next ten years as this is more relevant to the Sizewell C Project timescales.

9.5.113 The latest projections for the immediate districts, the region and nationally are summarised in **Table 9.33.** Population growth over the next ten years in East Suffolk (4.3%) is expected to be slightly lower than the national average (5.9%), and significantly lower than the average growth expected across the East of England region (7.3%). In absolute terms, the population of the immediate districts is expected to grow by 44,600 people, equivalent to 4,460 people per annum. This overall increase is expected to be distributed as follows:

- East Suffolk – an overall increase of 10,410, or 1,040 per annum.

- Mid Suffolk – an overall increase of 5,920 or 590 per annum.

- South Norfolk – an overall increase of 14,260, or 1,430 per annum.

- Babergh – an overall increase of 4,190, or 420 per annum.

- Ipswich – an overall increase of 7,240, or 720 per annum.

- Great Yarmouth – an overall increase of 2,590, or 260 per annum.

Table 9.33: Sub-national population projections, 2016–26

Area	2016 Population	2026 Population	Growth
Districts			
Great Yarmouth.	98,992	101,580	2.6%
South Norfolk	132,965	147,222	10.7%
East Suffolk	245,003	255,416	4.3%
*Suffolk Coastal**	*127,836*	*133,519*	*4.4%*
*Waveney**	*117,167*	*121,897*	*4.0%*
Mid Suffolk	100,720	106,638	5.9%
Ipswich	138,515	145,753	5.2%
Babergh	90,250	94,435	4.6%
Wider Scales (12 months to December 2018)			
Norfolk	891,731	944,073	5.9%
Suffolk	751,175	788,350	4.9%
East	6,129,005	6,573,378	7.3%

Source : ONS, sub national population projections, 2018.

9.5.114 The sub-national projections indicate future changes in the age structure of the population, showing the most significant proportional growth would be in the numbers of people aged 65 and over at all spatial scales.

9.5.115 As described in **Table 9.34,** Across the immediate districts the following changes in the overall population by age group are expected:

- Children (aged 0–15 years) – numbers in this age group are expected to increase by 3,180, or 2.2% between 2016 and 2026. This is below the projected rate in the East of England (7.0%) and England as a whole (4.9%). In East Suffolk there is expected to be very little change in the number of 0–15 year olds (0.0% change).

- Working age population (16–64 year olds) – numbers are expected to increase by 3,210 or 0.7% between 2016 and 2026. This is below the projected rate in the East of England (3.3%) and England as a whole (2.3%). In East Suffolk there is expected to be a fall in the number of working age residents (-1.2%, equivalent to a fall of 1,670 working age residents).

- Above retirement age (aged 65 and over) – numbers are expected to increase by 38,220 or 20.2% in the immediate districts between 2016 and 2026. This is slightly above the projected rate in the East of

England (20.0%) and England as a whole (19.4%). In East Suffolk the increase is expected to be 18.6% (12,080 residents).

Table 9.34: Sub-national population projections by age group, 2016–26

Area	% Growth Ages 0–15	% Growth Ages 16–65	% Growth Ages 65+
Districts			
East Suffolk	0.0%	-1.2%	18.6%
*Suffolk Coastal**	*-1.3%*	*-2.4%*	*22.6%*
*Waveney**	*1.5%*	*0.1%*	*14.2%*
Great Yarmouth	0.4%	-2.0%	15.7%
South Norfolk	11.1%	6.4%	21.0%
Mid Suffolk	-2.1%	0.2%	25.9%
Ipswich	2.9%	2.0%	20.8%
Babergh	0.0%	-1.6%	22.0%
Wider Scales (12 months to December 2018)			
Norfolk	5.5%	1.6%	16.7%
Suffolk	2.0%	-0.1%	20.6%
East	7.0%	3.3%	20.0%
England	4.9%	2.3%	19.4%

Source : ONS, sub national population projections, 2018.

ii. Employment projections (sector)

9.5.116 Employment projections are developed regionally via the East of England Forecasting Model (Cambridgeshire Insights, 2018) (Ref 9.39). This model is designed to facilitate the setting of consistent housing and jobs targets and is grouped by area (district and county) and variable, as well as skills.

9.5.117 The East of England Forecasting Model baseline forecasts for sectoral growth in employment are set out below for Suffolk (county) and East Suffolk (district) in **Table 9.35** and **Table 9.36** respectively. It is noted that these forecasts do not explicitly include Sizewell C, but do account for part of Sizewell B's construction period as a result of drawing on past trends in employment in the area.

Table 9.35: East of England Forecasting Model sector employment forecasts for Suffolk county (2017)

Sector	2015	2020	2025	2030	2035	Change 2015–2035
Agriculture	7,000	8,100	7,900	7,600	7,400	300
Extraction	300	100	100	100	100	-200
Manufacturing	33,100	32,400	31,000	29,500	28,100	-5,000
Utilities/Waste	3,700	4,500	4,600	4,700	4,900	1,200
Construction	27,500	29,400	31,100	32,400	33,800	6,300
Wholesale and Retail	55,900	56,300	57,200	57,900	58,400	2,500
Transport	23,600	26,900	27,400	27,800	28,100	4,500
Accommodation, Food & Drink	25,100	25,700	26,700	27,900	29,100	4,000
Communications	6,700	6,700	6,700	6,700	6,800	100
IT	4,800	5,500	5,800	6,000	6,200	1,400
Finance and Property	14,800	13,500	14,000	14,400	14,600	-200
Professional and Scientific	21,700	22,000	23,200	24,400	25,500	3,800
Business and Employment	37,700	28,400	29,500	30,600	31,800	-5,900
Public Setor	85,600	91,300	94,600	97,700	101,000	15,400
Arts, Entertainment	10,400	11,300	11,600	11,900	12,200	1,800
Other Services	9,700	10,200	10,300	10,500	10,800	1,100

Source: Cambridgeshire Insights, 2018.

9.5.118 **Table 9.35** sets out that in Suffolk:

- The public sector is projected to grow substantially, along with construction and service activities; and
- Business and employment services are projected to decline, as is manufacturing.

Table 9.36: East of England Forecasting Model sector employment forecasts for East Suffolk district (2017)

Sector	2015	2020	2025	2030	2035	Change 2015–2035
Agriculture	2,200	2,600	2,500	2,400	2,400	100
Extraction	100	–	–	–	–	-100
Manufacturing	10,200	10,000	9,500	9,000	8,500	-1,600
Utilities/Waste	1,100	1,300	1,300	1,400	1,400	300
Construction	7,600	8,300	8,700	9,000	9,300	1,700
Wholesale and Retail	15,500	15,600	15,800	16,000	16,200	600
Transport	10,800	12,600	12,700	12,800	12,900	2,100
Accommodation, Food & Drink	9,300	9,500	9,900	10,300	10,800	1,400
Communications	4,700	4,700	4,700	4,800	4,900	200
IT	900	1,100	1,100	1,200	1,200	300
Finance and Property	2,100	2,000	2,000	2,100	2,100	100
Professional and Scientific	5,800	6,000	6,200	6,500	6,700	900
Business and Employment	7,000	6,500	6,600	6,700	6,800	-200
Public Sector	23,000	24,400	25,300	26,200	27,100	4,100
Arts, Entertainment	3,200	3,500	3,600	3,700	3,700	500
Other Services	2,900	3,000	3,000	3,100	3,100	300

Source: Cambridgeshire Insights, 2018.

9.5.119 **Table 9.36** sets out that in East Suffolk:

- the public sector is projected to grow substantially, along with construction and service activities and transport employment; and
- business and employment services are projected to decline slightly, as is manufacturing.

iii. Skills and training forecasts

9.5.120 The Construction Industry Training Board (CITB) and Experian generate research into the future for construction skills, employment and their drivers on a four-year basis (CITB, 2018) (Ref 9.40). The latest report considers the period from 2019 to 2023 and sets out that:

- With an annual average growth rate of 1.2% for construction output between 2019–23, the East of England is similar to the forecasted UK average growth rate of 1.3%.

- Construction employment in the region is also forecast to grow at an average rate of 0.4% per year, rising from nearly 245,000 workers at the end of 2018 to nearly 250,000 by 2023.

- The average annual recruitment rate in the East of England is forecast to be 2.0% of the base 2018 workforce, stronger than the UK figure of 1.2%. This means the region would be looking for an extra 4,910 workers each year.

- In terms of roles, at a national level the greatest demand is for construction process management, other construction professional and technical staff scaffolders, wood trades, logistics personnel and plant operatives. In the East of England, growth is expected to be strongest for managerial, professional and technical occupations.

- At present, the forecasts for the East of England do not include Sizewell C. However, it is notable that stalled new nuclear power generation projects in the north-west (Moorside) and Wales (Wylfa Newydd) have had significant effects on revising down growth in those regions from previous projections.

9.6 Environmental design and mitigation

a) Introduction

9.6.1 As detailed in **Volume 1**, **Chapter 6** of the **ES** (Doc Ref. 6.2), a number of primary and tertiary mitigation measures have been identified through the iterative EIA process and have been incorporated into the design and construction planning of the proposed development.

9.6.2 In parallel with the assessment process, SZC Co. has been working with the local authorities and other stakeholders to identify and plan for measures to avoid, and/or mitigate, any negative impacts from the development and to enhance positive effects during the construction phase and once Sizewell C is operational.

b) Primary mitigation

9.6.3 This is often referred to as 'embedded mitigation' and includes modifications to the location or design of the development made during the pre-application phase that are an inherent part of the Sizewell C Project,

become a fundamental part of the design for which consent is sought, and do not require additional action to be taken.

9.6.4 A number of primary mitigation measures have been embedded into the design, and for the assessment, this chapter assumes that they are in place to mitigate otherwise potentially significant effects. The assessment notes that these mitigation measures would require construction and implementation themselves, and accounts for that transition period. These are identified in **Chapters 2** and **3** of this volume, and are summarised in this section. The summary makes clear where and why these measures have been included and the way in which they have contributed to the management and reduction of environmental effects.

9.6.5 The following primary mitigation relevant to socio-economic effects has been consulted upon and embedded into the Sizewell C Project:

i. Temporary Accommodation Campus

9.6.6 A temporary accommodation campus for construction workers, including facilities such as a gym, restaurant, bar and informal recreation facilities, to be located on the main development site.

9.6.7 These design measures, including provision for emergency services presence, welfare, food/drink and recreation activities for workers at the accommodation campus, would contribute to reducing potential effects on public safety and emergency services.

ii. Temporary Caravan Park

9.6.8 A temporary caravan site for construction workers would be located on the Land to the East of Eastlands Industrial Estate, also part of the main development site.

9.6.9 Design measures associated with the caravan site would contribute to reducing potential effects on public safety and emergency services.

iii. Temporary Occupational Healthcare Service

9.6.10 A temporary on-site, 24/7 occupational health service for construction workers is described in detail in **Volume 2**, **Chapter 28** of the **ES** (Doc Ref. 6.2).

9.6.11 The provision of an on-site occupational healthcare service for workers at the main development site would include mental and sexual health services. The provision of this occupational healthcare service would be secured through an obligation in the Section 106 Agreement (see **draft**

Section 106 Head of Terms provided as **Appendix J** to the **Planning Statement** (Doc Ref. 8.4)).

iv. Permanent Off-site Sports Facilities

9.6.12 SZC Co. has committed to significant investment in local recreation, sport and leisure provision in Leiston in the form of a 3G pitch and two multi-use games areas (MUGAs) at Alde Valley School in Leiston, in recognition that:

- the workforce would likely raise demand for specific types of activity – such as football – of which there is a local deficiency in provision (of all-weather pitches); and
- investment in facilities would be likely to make a positive contribution to integration and the experience of the workforce and local community.

9.6.13 This facility would have shared use with the school and local community and would therefore have residual impacts on recreation, sport, and leisure services which would be major beneficial at all levels.

9.6.14 Measures would be built in to the design to reduce safeguarding risks, such as physical and temporal segregation of use by workers and the community, and the school, at shared recreational facilities in Leiston.

9.6.15 SZC Co. proposes to construct or provide a contribution to fund the construction of this facility which would be managed by ESC. The funding would include a contribution for the maintenance of the pitches during the construction phase when the facilities would be used by the Sizewell C construction workforce as well as provision of a sink fund. During the operational phase, it is proposed that any ongoing costs of the sports facilities would be borne by ESC or Alde Valley School. The provision of the off-site sports pitches will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

v. Visitor centre

9.6.16 The existing Sizewell B visitor centre would be replaced with a permanent, modern educational facility for visitors, including school groups. It is proposed that the new visitor centre would be located at the north-east of the Coronation Wood development area, adjacent to the proposed Sizewell B training centre. It is anticipated that the proposed visitor centre would include exhibition spaces, an auditorium, media centre, viewing area, classrooms, and offices.

9.6.17 The visitor centre would be accessible by the general public with exhibition space and modern educational elements providing capacity for school groups. Its role would be to provide information to the general public and school groups about aspects including: the process for generating electricity, the benefits of low-carbon energy and sustainability more generally, and the new technology's role in the future of nuclear power in the UK. It would also illustrate the contribution of Sizewell C to carbon reduction and its role as part of the Suffolk Energy Coast and demonstrate the importance of the surrounding AONB.

c) Tertiary mitigation and enhancement

9.6.18 Some mitigation measures comprise standard management practice, and are therefore included as tertiary mitigation against which impacts are assessed. These measures are embedded processes/procedures, rather than physical design measures. For the purposes of the socio-economic assessment, processes and procedures specified for the Sizewell C Project are also proposed to provide enhancement for beneficial effects.

9.6.19 If, after accounting for these activities, significant adverse effects are still assessed as likely within **section 9.7** below, further mitigation measures are identified in **section 9.8** of this chapter.

9.6.20 These include employment and training activities to secure local recruitment set out in the **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9), a Worker Code of Conduct to help govern worker behaviour, and a **Supply Chain Strategy** provided in **Appendix B** of the **Economic Statement** (Doc Ref. 8.9).

9.6.21 The implementation of the **Employment, Skills and Education Strategy** and **Supply Chain Strategy,** including the proposed tertiary mitigation, will be secured through obligations contained in a Section 106 Agreement (see the **draft Section 106 Heads of Terms** appended to the **Planning Statement** (Doc. Ref. 8.4)).

i. Employment, Skills and Education Strategy

9.6.22 SZC Co. has worked closely with stakeholders in the region to develop a strategy with a range of measures that combine to create an environment in which education, skills and workforce development can flourish, to the benefit of both the Sizewell C Project and the region.

9.6.23 The **Employment, Skills and Education Strategy** is included as **Appendix A** to the **Economic Statement** (Doc Ref 8.9). It sets out a strategic approach centred around four strategic priorities:

- Creating economic benefit and improving social mobility by:
  - leaving a legacy;
  - addressing key government and regional policy priorities; and
  - linking employment, skills and education to complementary activities for developing the supply chain as set out in **Appendix B** to the **Economic Statement** – **Supply Chain Strategy** (Doc Ref 8.9).
- Minimising workforce and project risk caused by a lack of availability, capability, capacity or competence in the UK or regional skills base.
- Setting realistic DCO commitments and leveraging significant additional value.
- Where appropriate, integrating strategic activity between Sizewell C and Hinkley Point C – and in the future Bradwell B – by leveraging the full benefit of 'fleet effect' for skills and workforce.

9.6.24 The **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** sets out how learning from Hinkley Point C has helped provide more clarity about Sizewell C, and sets out a 'prospectus' of required roles and qualifications for Sizewell C in the future by phase of construction and type of role.

9.6.25 It then sets out a range of interventions and investments that the Sizewell C Project will make, to be secured through the Section 106 Agreement, including:

- A Sizewell C Jobs Service - SZC Co.'s focus on recruitment will be on targeting the right people into the right jobs through the enhancement of the Hinkley Point C Jobs Service. This will provide a service that is managed centrally but delivers locally though a small number of dedicated staff in Suffolk and through optimising external partnerships.
- Skills initiatives – including (where funding is referred to, this will be secured through the Section 106 Agreement):
  - a flexible Asset Skills Enhancement and Capability Fund with a strong, accountable governance structure including Tier 1 contractors and local stakeholders;

- a commitment to funding a Regional Skills Coordinator post to provide a focal point of coordination and skills planning between the Sizewell C Project and providers; and
- supporting contractors in exploring options for training and assessment facilities to enable the competence of workers to be assessed and to identify areas of additional training.

- Education initiatives – partnering with regional stakeholders to invest in a range of activities including:
  - supporting specific and existing educational initiatives in the region that are working well or are supporting young people in raising their aspirations for careers in energy, engineering or construction;
  - supporting and investing in specific interventions with a focus on career introduction and development;
  - starting early with 'aspiration raising' activities;
  - introducing actual opportunities to 'have a go' with an emphasis on the promotion of Sizewell C's critical skills that are in short supply;
  - creating an innovative and 'first of a kind' bursary scheme to support the creation of alternative pathways for those that haven't reached the required entry level, providing a 'second chance' for young people in Leiston, Lowestoft, Great Yarmouth and Ipswich; and
  - establishing a Young Sizewell C programme providing an insight programme to inspire and build awareness of opportunities among young people who are closest to the workplace and to help pipeline them into actual Sizewell C opportunities.

9.6.26 The **Employment, Skills and Education Strategy** will be linked with priority social services target groups, for example so that outreach programmes target children, NEETs, and other vulnerable groups

ii. Supply Chain Strategy

9.6.27 SZC Co. has set out to develop a strategy for its supply chain for Sizewell C that builds on the good progress made at Hinkley Point C and seeks to engage and promote business in the region to gain competency to compete for and win contracts.

9.6.28 The **Supply Chain Strategy** is included as **Appendix B** to the **Economic Statement** (Doc Ref 8.9). The core objective of the strategy is to

successfully deliver the construction and commissioning of the Sizewell C Project utilising the expertise and capability within the local and regional supply chain, where possible.

9.6.29 The strategy sets out how SZC Co. will aim to replicate the design of Hinkley Point C to benefit from being able to use the UK approved, frozen EPR™ design being built in Somerset, while taking into account local conditions in order to develop and implement Sizewell C. Replication does not mean that the entire Hinkley Point C supply chain and workforce will be transferred to Sizewell C, rather that core elements of the supply chain that are critical to replication of the power station are transferred.

9.6.30 SZC Co. therefore anticipates that Sizewell C will be able to deliver a similar level of economic benefits to Suffolk and the East of England, in terms of supply chain opportunities for local and regional businesses, as Hinkley Point C is delivering for Somerset and the South West.

9.6.31 An important role of the strategy is to contribute to the economy of the East of England and the UK more widely: Sizewell C will support the maintenance and development of the UK nuclear sector and wider construction innovations and skills.

9.6.32 The strategy identifies lessons learnt from previous experience, and sets out a range of initiatives, to be secured by the Section 106 Agreement, that will enable the region to capture economic benefits generated by the goods and services needed for the delivery of the Sizewell C Project. These include:

- A Sizewell C supply chain team, partnering with the Suffolk Chamber of Commerce. The team will assist local and regional businesses in winning contracts on the Sizewell C Project through management of a supply chain website with project information, details of work packages and professional standards, signposting to relevant support, details of events and examples of success.

- A Sizewell C Supply Chain Portal capturing details and core capabilities of regional businesses and mapping them against requirements of the Sizewell C Project, brokering business support and matching suppliers with SZC Co. and Tier 1 contractors.

- Contractor engagement including senior leadership commitments from Tier 1 contractors to engage with the local and regional supply chain, including attendance at ‘meet the buyer’ events.

- Monitoring and reporting in order to compare and contrast local and regional levels of engagement.

9.6.33 Sizewell C's strategy is to integrate employment, skills, and education with the supply chain development activity in order to help jobseekers find roles on the Sizewell C Project and to help backfill vacancies that may become harder-to-fill within the supply chain, using the Sizewell C Jobs Service.

9.6.34 The **Supply Chain Strategy** will be linked with priority social services target groups, for example so that outreach programmes target children, NEETs, and other vulnerable groups

iii. Code of Construction Practice and Worker Code of Conduct

9.6.35 Some tertiary measures have been developed for multiple purposes – for example to deliver safe, efficient construction activities, but also to promote community cohesion and minimise effects of the workforce on perceptions of public safety.

Code of Construction Practice (CoCP) (communication, community and stakeholder engagement)

9.6.36 The strategy for communication, community, and stakeholder engagement is set out in the **CoCP** (Doc Ref. 8.11). This would provide a point of contact between the community and the Sizewell C Project, both to disseminate information and to receive comments/complaints. Community liaison activities set out in the **CoCP** (Doc Ref. 8.11) would address issues relating to community cohesion and integration that may arise from members of the public.

Recruitment activities and Worker Code of Conduct

9.6.37 Security vetting would be embedded into any recruitment and contracting by SZC Co. and Tier 1 contractors.

9.6.38 A Worker Code of Conduct (see Hinkley Point C example appended to the **Community Safety Management Plan** (Doc Ref. 8.16)), would be put in place to set required standards on behaviour both on and off site.

9.6.39 The Worker Code of Conduct would be explained to workers at induction and reinforced in the course of the Sizewell C Project through ongoing training and awareness campaigns. Each worker would be required to sign a copy of the document at induction. Complaints would be monitored, as discussed in the **CoCP** (Doc Ref. 8.11), and action taken where necessary.

9.6.40 Whilst the absence of a contractual relationship means SZC Co. are not able to discipline workers directly, regular performance reviews with

contractors would provide a means of ensuring good worker behaviour and breach of the Worker Code of Conduct may mean dismissal of the worker from the Sizewell C Project.

iv. Transport measures

9.6.41 Mitigation related to road safety as set out in **Chapter 10 (Transport)** of this volume has also been considered as such mitigation would reduce effects on the emergency services.

9.6.42 Tertiary mitigation strategies such as the **Traffic Incident Management Plan** (Doc Ref. 8.6), **Construction Traffic Management Plan** (Doc Ref. 8.7), and the **Construction Worker Travel Plan** (Doc Ref. 8.8) will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**). These implementation strategies would contribute to a reduction in significance of potential effects on emergency services, which rely on local roads to respond to incidents.

9.7 Assessment

a) Introduction

9.7.1 This section presents the findings of the socio-economic assessment for the construction, operation and removal and reinstatement (where relevant) phases of the proposed development.

b) Construction

i. Overview of construction phase effects

9.7.2 The socio-economic construction phase effects of the Sizewell C Project result from the workforce required to build Sizewell C, and the demand for goods and services to support the development.

9.7.3 **Section 9.4** of this chapter, along with the appended technical notes, summarises the Sizewell C Project assumptions in relation to:

- how many workers will be required and when (workforce profile);
- where workers are likely to be recruited from (HB and NHB recruitment);
- where NHB workers are likely to live, based on accommodation capacity assumptions and SZC Co.'s **Accommodation Strategy** (Doc Ref. 8.10), and the Gravity Model produced for the **Transport Assessment** (Doc Ref. 8.5); and

- the demographic characteristics of the workforce.

9.7.4 This section uses these assumptions to assess the effects of the proposals against the policy, baseline and significance criteria described above in relation to the following topics:

- Economic effects including labour market effects, business and supply chain effects, wages/spending and additionality, and effects on the tourism and agricultural economies.
- Accommodation effects.
- Population and demographics.
- Public services/community facilities including education and pre-school; social services; other county level services; formal sport and leisure; and regulatory and environmental services.
- Community safety and emergency services.
- Community cohesion and integration.

ii. Economic effects

9.7.5 The construction of Sizewell C could have a range of economic effects. In this section the areas of impact would focus on spatial levels identified in the baseline assessment.

Labour market effects

9.7.6 Assumptions about the labour force requirements for the construction of Sizewell C are set out in **Appendix 9A** of this volume.

9.7.7 The construction workforce profile provides an estimate of the number of roles required in any given month, by type of role, over the construction period. It shows the overall build-up and ramp-down of the construction workforce, and its components – civils construction, mechanical, electrical and heating, professional and management, site support/services, construction of associated development sites (mainly civils) and the operational workforce.

9.7.8 The workforce profile highlights that:

- in the early years, the workforce profile is mainly driven by the requirement for civils roles, supported by non-construction project management and professional roles and site support roles;

- during this time there is a component of the workforce constructing the associated development sites (including the new road schemes, park and ride facilities and the on-site accommodation campus);
- the civils workforce peaks at just above 3,600 workers in year five of the construction phase;
- the civils workforce then reduces, as 'J0'[4] is passed and at this stage there is an increase in mechanical, electrical and heating roles. During this stage, the operational workforce is also starting to build up;
- the peak of the construction workforce happens in year seven of the construction phase – at this stage the mechanical, electrical and heating workforce has peaked at around 3,300 roles;
- the peak of the workforce is relatively short – it is likely to exceed 7,000 workers for less than two years; and
- following the mechanical, electrical and heating peak, the workforce drops substantially and from year ten to completion is well below 2,000 workers – around this stage associated development sites are deconstructed and site restoration is undertaken, and the operational workforce reaches full capacity (at 900) – so the construction-related workforce accounts for around 1,000 workers at this stage.

9.7.9 This 'gross' peak employment total of 7,900 (plus 600 associated development staff) equates to around 1% of jobs in the 90-minute commuting area (CDCZ) for HB workers.

9.7.10 The build-up of the workforce equates to approximately 1,100 jobs per year for the first 7 years of the Sizewell C Project (up to peak construction). This equates to 0.2% of total jobs in the CDCZ. The addition of 1,100 jobs to the regional economy (on average) over this period compares to an average annual jobs growth of 4,900 in Suffolk and 67,500 in the East of England between 2012 and 2017.

Non-home-based recruitment

9.7.11 Because of the relatively high levels of labour demand, it is projected that a substantial proportion of the workforce would be recruited from outside the

[4] The date SZC Co. uses to denote the first pour of nuclear safety related concrete – a standard milestone in French nuclear construction.

90-minute area. This would vary by skill type and timing within the Sizewell C Project as described in **Appendix 9A** of this volume.

9.7.12 The NHB split is based on the Gravity Model assumptions, including assumptions about project accommodation set out in **Appendix 9D** of this volume.

Home-based recruitment

9.7.13 The Sizewell C Project is likely to generate the types of non-operational jobs for existing local residents at the overall peak of the construction period as shown in **Table 9.37.**

Table 9.37: Estimated construction and support jobs supported at peak likely to be taken by home-based workers

Occupation Type	Home-Based Workers at Peak	
	Workers	Sectors
Civil operatives.	460	Timber and formwork, concrete/cement/ /steelfixers, drivers, lifting operatives and supervisors, labourers, steelwork erectors, access and other plant operators, welders, civil works labourers and semi-skilled occupations.
Mechanical, electrical and heating operatives.	650	Semi-skilled mechanical, electrical and heating operatives, welders, pipefitters, cabling operatives, fitters, electricians, laggers, support services, instrumentation.
Professional and management.	150	Mainly professional, management-type jobs.
Site services/support.	550	Administrative, private security and service sector (e.g. catering, cleaning).
Associated developments.	600	Includes drivers, security, service-sector jobs, cleaning, maintenance and administrative jobs.
Total	**2,410**	**All construction-related workforce associated with the Sizewell C Project at peak.**

9.7.14 At peak, this means an additional 2,410 jobs for local residents across a range of occupations and skill levels in non-operational roles. In total, this equates to around 7% of total construction jobs in the 90-minute area, and is therefore assessed as a moderate beneficial effect which would be **significant** at this level.

9.7.15 Construction already accounts for over one billion pounds of output in Suffolk, contributing around 7% of the county's total output. In the construction sector in Suffolk, gross value added per worker per year stands at over £60,000 per full-time equivalent. Activity at Sizewell C

therefore equates to close to two and a half billion pounds over the course of the construction phase (based on around 40,000 person-years of employment required).

Impacts on the dynamic labour market

9.7.16 The labour market is dynamic: people move in and out of the labour market and move between jobs regularly. As demand for workers increases, jobs may be filled by people currently in employment moving jobs, people who are registered as unemployed, and people who do not form part of the labour market because they are classed as economically inactive.

9.7.17 There are generally two components of worklessness – economically active people who are unemployed (but are actively seeking work via claiming Job Seekers Allowance), and people who are economically inactive, but are ready to and want to work. The number of people who are economically inactive but who want to work is significantly greater than the numbers who are registered as unemployment benefit claimants. The Government's preferred definition of unemployment – the International Labour Organisation (ILO) measure – shows higher numbers of people unemployed than either the Job Seekers Allowance measure or the economically inactive who want to work.

9.7.18 The ILO definition of unemployment includes both those who are economically active, but unemployed and seeking work (for example, claiming Job Seekers Allowance), and people who are economically inactive but want to work and are work-ready (but are not actively seeking work). Taken together, these groups offer a considerable source of spare capacity for the labour market.

9.7.19 **Figure 9.5** identifies the extent of this labour pool in Suffolk, showing that currently there are 31,400 people in Suffolk who are unemployed but looking for work, or are economically inactive but want a job, and on average through the economic cycle there are between 35,000 and 40,000 (ONS Annual Population Survey, 2018).

9.7.20 These numbers are volatile, and there are significant annual changes in the level of economic inactivity, which is much more sensitive to changes in economic output than unemployment. It can therefore be seen that the number of people who are active in the labour market is not fixed – it expands and contracts according to economic environment, so when there are more jobs available, it can be expected that more people would be economically active.

9.7.21 Depending on the point in the economic cycle, between 40% and 52% of new jobs are filled by people who were not previously working (Ref 9.41). Some of these would be registered as unemployed, and some would not.

Some would need help to get into work, others would not. The corollary of this is that up to 60% of vacancies would be filled by people who change job.

9.7.22 This is the normal operation of the labour market, and the choices of individuals within it, and is not directly related to the impacts of the proposed development.

9.7.23 This is partly because the supply of labour is not fixed. When new jobs are created, it encourages more people to start work and enables those who are in work to increase their hours. It also allows people who currently have to travel out of the area to change jobs to something closer and more convenient.

9.7.24 Employment and economic activity should also be seen in the context of moves between jobs, sectors and locations. Whilst there is no single data source for average job tenure, a number of UK-based studies conducted based on the Labour Force Survey and the Organisation for Economic Co-operation and Development (OECD) produces an annual dataset (OECD, 2015). **Table 9.38** summarises these broad statistics on jobs tenure across all industries:

Table 9.38: Average job tenure in the UK

Job Tenure	<1 Year	1–3 Years	3–5 Years	5–10 Years	>10 Years
Percentage	17.6%	16.5%	13.3%	20.7%	31.9%

Source: OECD, 2015.

9.7.25 This means that of the 343,500 people working in Suffolk (APS, 2018), on average, more than 60,000 change job in any given year. The data also shows that around half of workers have a job tenure of less than five years. By extension, within the construction phase of Sizewell C, most workers would change jobs twice and most employers would need to fill each of their posts twice.

9.7.26 Average tenure is particularly short in construction given the transient and mobile nature of projects and the workers they employ. A survey by BMG Research for CITB in 2018/19 (Ref 9.42) identified that in the East of England:

- 27% of workers expect to be working on a site for less than three months;
- 18% of workers expect to be working on-site for between three and six months; and

- only 23% expect to be working on a site for more than one year.

9.7.27 Most construction projects in the UK and the East of England are relatively short-term in nature, with a constant churn of jobs and skilled workers operating in many different locations. Sizewell C would be fairly unusual, as it is a longer-term project with a very wide range of skills required over different stages of the build.

9.7.28 Whilst a temporary impact, Sizewell C's construction phase would be relatively long-term for a construction project, and notably longer than the average job tenure in the UK. A worker who might leave a permanent job to move to a temporary construction job on the Sizewell C Project would do so voluntarily – as is the normal operation of the labour market – and the training and work experience received would give them the opportunity to move onto other jobs, careers and projects.

9.7.29 SZC Co.'s contractors stand to benefit from recycling workers over that period due to lower costs in re-training, so it is likely that workers on the Sizewell C Project would be in a strong position to move to other work roles, gaining sustainable careers with transferable skills over a long time period. As such, SZC Co. has developed an **Employment, Skills and Education Strategy,** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9) to maximise local recruitment, and ensure the skills benefits can be retained locally. **Table 9.39** shows the proportion of total jobs and jobs in the construction sector in Suffolk that the total workforce at Sizewell C represents in each year of the Sizewell C Project.

Table 9.39: Sizewell C jobs as a % of all jobs and construction sector jobs

Year	SZC Jobs (Annual average)	SZC Construction Jobs[5]	Suffolk County			
			All Jobs (Forecast from 2022)	%	Construction Jobs (Forecast from 2022)	%
1	742	497	376,105	0.2%	30,215	2%
2	1,567	1,050	377,840	0.4%	30,487	3%
3	3,072	2,058	379,712	0.8%	30,782	7%
4	4,158	2,742	381,679	1.1%	31,109	9%
5	6,888	4,475	383,394	1.8%	31,375	14%
6	6,931	4,578	385,038	1.8%	31,596	14%

[5] "Construction" i.e. mechanical, electrical and heating and civils and associated development construction, not including non-construction roles at associated development sites such as catering or security.

Year	SZC Jobs (Annual average)	SZC Construction Jobs[5]	Suffolk County			
			All Jobs (Forecast from 2022)	%	Construction Jobs (Forecast from 2022)	%
7	7,796	5,067	386,763	2.0%	31,864	16%
8	6,742	4,100	388,438	1.7%	32,111	13%
9	4,506	2,582	390,243	1.2%	32,412	8%
10	2,116	895	391,728	0.5%	32,664	3%
11	1,727	558	393,534	0.4%	32,947	2%
12	1,284	257	395,268	0.3%	33,245	1%

Labour market churn and 'hard to fill' vacancies

9.7.30 There is the potential as part of this process that employees would be recruited from other local employers, thus causing vacancies that are harder to fill in the case of some occupations.

9.7.31 Experience at Sizewell B was that around 20% of locally recruited employees had previously been unemployed or economically inactive and around 30% (600 of 2,200) recruited in the peak recruitment year had come from other local employers. A survey of 160 local companies found that less than 10% of the companies thought the power station project made it more difficult to retain or recruit (replacement) staff (Ref 9.43).

9.7.32 Research by the Resolution Foundation (Ref 9.41) suggests that up to 60% of people starting new jobs have come from other jobs, with the remainder being entrants into the labour market. This is strongly linked to the economic cycle, and in the last recession in 2010 only 48% of jobs were filled by people already in work. This suggests that Sizewell C is likely to see a larger proportion of its local workforce drawn from people entering or re-entering the labour market.

9.7.33 If similar proportions to Sizewell B were to occur at the peak of the Sizewell C construction programme, then of the (up to) 2,410 new home-based roles (including at associated development sites but discounting operational staff) this would mean around 1,205 would move with the existing employer and 1,205 would be newly recruited (from either worklessness or another job).

9.7.34 Of those newly recruited up to c. 480 would be formerly unemployed or previously inactive workers and up to 725 would be workers from existing firms. This would equate to:

- around 2% of unemployed workers in the CDCZ area, or around 5% in Suffolk gaining work on the Sizewell C Project. This is assessed as a

moderate to major beneficial impact which would be **significant** at all spatial levels; and

- around 2% of the construction workforce in the CDCZ area, or 4% in Suffolk gaining work on the Sizewell C Project, which would be negligible and **not significant** in the context of the overall 'churn' within the construction and overall labour market in the area.

9.7.35 Labour market churn (as opposed to displacement[6]) (Ref 9.44) is a normal feature of the economy, particularly in the construction sector. Employers fill any emerging vacancies, across a range of skills. Even those jobs that are highly skilled can be filled by training people from the next level down, so these would generally be filled from elsewhere in the labour market. It is likely that the creation of employment at Sizewell C would increase labour market churn, but given the scale of the labour market and its flexibility, this change is considered to be **not significant.**

9.7.36 The Sizewell C Project would recruit HB workers from four different categories:

(a) locals without a job or with spare capacity for work;

(b) locals who change job;

(c) locals whose employer gets a contract on the Sizewell C Project; and

(d) locals who work elsewhere or are self-employed and/or work on very short-term contracts/tenures.

9.7.37 SZC Co. considers that the Sizewell C Project should aim to achieve a high level of local benefits by recruiting from categories (a), (b), (c), and (d) and that (b) is the area of concern for existing local businesses, local authorities, and NALEP as identified in the **Consultation Report** (Doc Ref. 5.1).

9.7.38 Category (a) has significant potential for recruitment based on existing and continual spare capacity in the labour market as set out above; and would be enhanced through SZC Co.'s package of measures to improve skills and education set out in its **Employment, Skills and Education Strategy,** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9).

9.7.39 Hinkley Point C's initiatives to support employment, recruitment, skills and training have proven to be successful – including (Ref 9.45):

[6] Displacement is defined in the HM Treasury Green Book as: "*the degree to which an increase in economic activity promoted by an intervention is offset by reductions in economic activity elsewhere*" (Ref 9.44).

- a cumulative total of 433 apprenticeships have been delivered (as at April 2019) compared to a project aspiration to create 400 new apprenticeships and facilitate 1,000 during the construction phase;

- 15,150 people have registered with the HPC Jobs Service (of which 48% are local residents) (as at January 2019) and 759 people have been placed in work through the HPC Job Service (as at April 2019) of which around 50% are local residents;

- 740 young people (as at April 2019) have registered with the Young HPC Programme; and

- by March 2018, 8,767 people in West Somerset had benefitted from the project's interventions for developing career choices and employment outreach such as aspiration building and skills development.

9.7.40 Category (c) has the opportunity to deliver benefits to existing businesses and their employees as a result of growing competencies and skills.

9.7.41 Evidence points strongly to a dynamic labour market that is flexible and responsive, rather than an over-heated labour market where extra demand would cause likely significant impacts.

9.7.42 As a result, significant adverse impacts are not anticipated, but SZC Co. is working to ensure this is the case through a range of employment, skills and supply chain support measures.

Business and supply chain

9.7.43 The development of Sizewell C would create supply chain opportunities, and represents a substantial part of the UK's national nuclear new build programme and wider infrastructure development.

9.7.44 The supply chain would operate on a number of levels:

- There would be several Tier 1 contractors appointed for the construction of the Sizewell C Project, national and international companies working independently, or through alliances who would be responsible for delivering one or more packages of works. A substantial proportion of construction expenditure would be on equipment and materials through this group.

- There would be a large number of Tier 2 sub-contractors and suppliers working for these contractors, ranging from providing

materials, equipment, very specialist skills, through to more general trades.

9.7.45 The technology suppliers/engineers and equipment and materials contracts (national and international level) would contribute to national policy ambitions set out in the UK's Industrial Strategy (Ref 9.46) to develop the UK's low carbon manufacturing capacity.

9.7.46 There are however, a number of local and regional firms that may benefit from these contracting opportunities. SZC Co. and its supply chain would also procure a large range of other (non-construction) services including, for example, professional and design services, facilities management (for campuses and park and rides), transport services, security and catering.

9.7.47 Construction contracts and sub-contracts, and particularly non-construction packages would have a much stronger local and regional element, with a substantial proportion of construction value retained in the local economy through wages to HB workers and expenditure by NHB workers.

9.7.48 At Hinkley Point C[7], EDF Energy and the Department for Business, Energy & Industrial Strategy set out that:

- Over £650 million had (at July 2018) been spent in the south-west (including South Wales).
- In addition to the £650 million of expenditure to date, contracts have been entered into for a further £700 million, including larger Tier 2 contracts.
- This brings a total of commitments, including spend to date, to over £1.3 billion. A project to capture spend below Tier 1 has since been rolled out.

9.7.49 Committed local and regional spend has increased since the publication of the BEIS report referenced above, and stood at £1.55 billion at the end of 2018. This committed regional spend equates to around 7% of total spend on the Hinkley Point C project, and is likely to grow further.

9.7.50 By comparison, information on local contract expenditure for the main civils contractor at the most recent comparative example of a new nuclear build elsewhere - Flamanville 3 in France - showed about 2% local expenditure out of €400 million total (2007–mid-2009), within 50km of that site, mainly in Cherbourg.

[7] BEIS (July 2018) Hinkley Point C Wider Benefits Realisation Plan.

9.7.51 At Sizewell B, the figure of contracts with local firms in the larger area of Suffolk and Norfolk was a little higher at about 4% (i.e. c. £80 million out of total contract value of about £2 billion) over the construction phase (1987-1995, not adjusted for inflation).

9.7.52 The total value of the Sizewell C project is estimated at £20 billion, made up from the sourcing of goods and materials, and cost of labour. It is anticipated that – if similar activities and local supply chain recruitment are achieved at Sizewell C as Hinkley Point C – there could be a 'local' retention of in excess of £1.5bn over the construction period, equivalent to an average of £125m per year.

9.7.53 This is considered a moderate beneficial effect at the regional level. This would be **significant**.

Wages/Spending and additionality

9.7.54 Assuming NHB workers spend all of their nightly subsistence allowance of £40, that would increase spending in the area by an average of £21.5 million per year, or nearly £260 million over the construction period.

9.7.55 The extra wages and spending from HB workers will depend on their previous circumstance, but if up to 50% were previously unemployed, this would represent an average boost to incomes each year of £15 million compared to receiving £10,000 per year in benefits. The boost to local spending would be less than that (after taxes and savings) but could still be £5 million per year or £60 million over the construction period.

9.7.56 Together these add up to just over £320 million of extra local spending during the construction phase.

9.7.57 The estimated net additional outcome at Sizewell B for additional workforce expenditure in the locality was around £80m. Uprating this, taking into account the construction costs for Sizewell C, would give a total of £190m or an average of £16m per year.

9.7.58 Local wages for HB workers and local spending on food and accommodation by NHB workers would equate to just under £1.1bn at an average of £91m per year over 12 years.

9.7.59 All of the impacts set out above would be additional to the local and regional economy, in that without the development of Sizewell C they would not occur - in economic terms there is no 'deadweight' (also known as non-additionality), i.e. there is no investment in a new nuclear plant in the area that would have happened anyway. Similarly, there is no 'displacement' or activity that moves to the site that would otherwise take place elsewhere.

9.7.60 As a result, the wages/spending and additionality effects of the Sizewell C Project are considered to be moderate beneficial and **significant** at the local and regional scale.

9.7.61 It is recognised that these benefits relate to the economy and workers within the economy, noting that there is potential for businesses to find that some vacancies become harder to fill. This effect is addressed earlier in this section.

9.7.62 Further information on the economic benefits of the Sizewell C Project is set out in the **Economic Statement** (Doc Ref. 8.9).

Effects on the tourism economy

9.7.63 The NPS EN-1 (Ref 9.1) states that the construction, operation and decommissioning of energy infrastructure may have socio-economic impacts and that:

> *"Where the project is likely to have socio-economic impacts at local or regional levels, the applicant should undertake and include in their application an assessment of these impacts as part of the Environmental Statement… which may include effects on tourism"* (paragraph 5.12.2-3) (Ref 9.1).

9.7.64 It also sets out that that:

> *"The Infrastructure Planning Commission may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)"* (paragraph 5.12.7) (Ref 9.1).

9.7.65 Some stakeholders have raised concerns that the Sizewell C Project's construction phase may lead to a reduction in visitor numbers and therefore their spending, affecting the overall output of the tourist economy and businesses within it.

9.7.66 Empirical evidence on this that meets the test in NPS EN-1 is difficult to extricate from the many other factors that influence tourism, and would be based on *ex-ante* perception which may not translate to actual effects.

9.7.67 Stakeholders have identified a number of risks, but there is limited empirical evidence to support the position that these would lead to likely significant effects. The following section reviews evidence from elsewhere, including how the DCO application for Hinkley Point C sought to deal with the issue.

Experience from Hinkley Point C

9.7.68 Prior to construction of the project, EDF Energy and three local authorities closest to Hinkley Point C commissioned a face-to-face survey of tourists in Somerset to understand the level of awareness of the proposals for the new nuclear power station, and to try and identify the scale of potential impacts that the project could have. At the time, the local authorities were concerned that there would be a translation from interviewees' perceptions about whether they would be more or less likely to visit the area during the construction phase, to actual quantified reductions in visitor nights and therefore expenditure.

9.7.69 However, it is very difficult to draw quantified conclusions from surveys where people are asked to estimate how they would react to a hypothetical situation. This is true generally (and evidenced by the poor predictive power of political polling) and specifically in the case of tourism. In this case, visitors were presented with (necessarily limited) descriptions of the impacts that Hinkley Point C might have, and asked what it would mean for their future visits. The survey results suggested that around 10% of future visitors would change their plans and not visit.

9.7.70 In reality, these potential changes to visitor activity have not materialised, suggesting that this is not an accurate or reliable approach to quantifying effects on the tourist economy.

9.7.71 EDF Energy and the Hinkley Point C Tourism Action Partnership (including local authorities and other tourist-sector stakeholders) in the south-west have been monitoring the effects of Hinkley Point C's construction on tourism activity, as required by the terms of that project. The latest Socio-economic Advisory Group report (SEAG, 2019) (Ref 9.47) for these potential effects sets out that anticipated negative effects have not materialised to date, local tourism business confidence (of continued visitor income) seems high, and mitigation measures provided by EDF Energy in advance have helped. These include:

- Using public relations support to deliver social media and press campaigns to promote Somerset and Exmoor as destinations.
- Providing support for tourism businesses with workshops and networking.
- Monitoring business performance and optimism.
- Supporting the DMO in Somerset and Exmoor with finance and expertise.

- Running an advertising campaign focused on target markets and off-peak seasons.

9.7.72 The Hinkley Point SEAG Tourism Dashboard (a reporting mechanism for monitoring of potential effects of the project on tourism agreed via DCO governance) states that:

> *"All metrics suggest continued growth and development and the tourism business survey shows no detrimental impact on visitor perceptions or business confidence as a result of Hinkley Point C".*

9.7.73 The same conclusion is reached in the report of Professor Glasson for the New Nuclear Local Authorities Group (Ref 9.47). This states that:

> *"Anticipated negative impacts have not materialised to date. Indeed confidence seems high. Mitigation measures, provided in advance, have helped; ……There is also the added bonus for some tourism accommodation providers of much fuller occupancy over the calendar year. Hinkley Point C itself is an added Somerset visitor attraction that is likely to become more popular"* (Ref 9.47).

9.7.74 Additionally, data on employment in tourism during the construction period of Hinkley Point C to date has showed that since development consent was granted in March 2013, tourist sector employment in Somerset has grown by 32% in Somerset and 20% in the districts closest to the Hinkley Point C site (West Somerset and Sedgemoor) (based on ONS BRES, 2013–18).

9.7.75 The sector has grown in Somerset at 3 times the rate of total employment growth during that period, and has consistently accounted for between 10% and 12% of all jobs in the County.

Experience from Sizewell B construction

9.7.76 Similar evidence of trends in tourism employment during the construction of Sizewell B also identified no impact on the tourist economy as a result of construction activities.

9.7.77 **Figure 9.6** shows a consistent time-series across public datasets for 'high-level' SIC definitions for *"hotels and restaurants"* and *"recreation and cultural"* SIC codes between 1984 and 2018 based on ONS longitudinal data. This shows the absolute number of jobs in these combined sectors in Suffolk Coastal, Mid Suffolk, Waveney, East of England and Great Britain with the Sizewell B construction period and peak, and national negative growth periods (recession) highlighted.

9.7.78 The shaded area on **Figure 9.6** is the construction period for Sizewell B. This highlights that there was only a marginal change in employment in the tourism economy relative to the total number of jobs in the local area, and that fluctuations are in line with average annual variations seen throughout the time series.

9.7.79 Additionally, in real terms the number of jobs in Suffolk Coastal increased significantly over this time, as did tourism-related jobs. Between 1987 and 1995 (the Sizewell B construction period), jobs in these sectors increased by around a third (630 jobs), while overall the total number of jobs grew by a fifth as set out in **Figure 9.7**.

Understanding potential sensitivities

9.7.80 SZC Co. recognises that while there is little or no empirical evidence from similar projects supporting direct effects of the Sizewell C Project on the tourist economy, there may be potential for:

- localised effects (the potential for very local effects on businesses and activities where there is the potential for a combination of effects);
- specific characteristics of the Suffolk coast that attract visitors to lead to greater sensitivities in terms of visitors' perceptions of the area in light of the Sizewell C Project; and
- perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project (the potential for perception of changes to e.g. traffic, where this is already an influencer on propensity to visit).

9.7.81 SZC Co. set up a working group in 2015 to act as a forum presenting and reviewing baseline data collection, potential effects and develop mitigation with representatives from the local authorities (SCC and ESC), NALEP, Suffolk Coast DMO, Visit Suffolk, Visit East Anglia/East of England, Royal Society for the Protection of Birds (RSPB Minsmere) and National Trust Dunwich Heath were subsequently included in the group.

9.7.82 This process led to the development of a Tourism Survey – undertaken and produced by Ipsos MORI for SZC Co. as shown in **Appendix 9F** of this volume, with the following overarching aims:

- Target a national sample of those who have visited the Suffolk coast or who say they are likely to visit.

- Build an understanding of how construction might change visitor behaviour.
- Set out findings from exploratory qualitative research, and source ideas and suggestions for the potential use of a Tourism Fund (to be secured through the Section 106 agreement).
- Disaggregate data and look at the opinions of different types of visitors and what might influence their likelihood to visit.

9.7.83 The survey was undertaken via an online access panel, which included a screener survey to ensure a representative sample, and a short set of questions to establish eligibility resulting in an overall sample of 3,093 people completing a 20 minute survey.

9.7.84 The sample consisted of people who had visited the Suffolk coast before – mainly in the last 24 months – or who intended to visit in the future (in the next 24 months). The survey asked initial questions related to people's experience of the Suffolk coast including the things they like and dislike, the places they visit, and their visiting behaviour, before describing the Sizewell C Project, and asking a series of questions related to their prior knowledge of Sizewell C, attitudes to nuclear in general, and then perception of the Sizewell C Project in respect of their likelihood to visit more or less in the future, potential alternatives, and effects on the way they would visit.

9.7.85 The report provided in **Appendix 9F** of this volume finds, at a high level, that:

- 27% of respondents knew about the Sizewell C Project, of which 10% knew *'a fair amount or a lot'*. 72% had either never heard of the Sizewell C Project (50%) or knew almost nothing about it (22%);
- having been introduced to the Sizewell C Project via information as part of the survey, 55% said that it hadn't changed their views about whether to visit, 13% stated they were more likely to visit, and 29% stated they were less likely to visit, to varying degrees;
- 39% said they would be likely to visit less often during construction, 8% said they would be likely to visit more often, and 53% said that the construction of Sizewell C would not make a difference to how often they visit, or they didn't know how it would affect them;

- the majority of people reported that they would like to know more about the impacts of construction of the Sizewell C Project to plan future visits; and

- concerns raised included perceptions around traffic delays and availability of accommodation.

9.7.86 The survey and report do not quantify the economic effect of the Sizewell C Project on tourism – rather, the results provide information on the characteristics of people who think they are more or less likely to visit, after having considered a short summary of information about the Sizewell C Project's location and potential effects.

9.7.87 The results set out where people consider themselves less likely to visit the area around Sizewell C on the Suffolk coast, but do not consider how long these people may, or may not, stay. As set out in the report, potentially the most significant net effect is reported by those with the lowest likelihood to visit.

9.7.88 The results provide helpful information to determine the approach to managing risk via a Tourism Fund to be secured through the Section 106 agreement, as discussed in **section 9.8** of this chapter. For example, the information gained on who may consider themselves more likely not to visit and why, will enable effective mitigation to target those who report a likelihood to return less often or are less certain to return, and therefore reduce this perceived risk.

9.7.89 Those who state they are less likely to visit, or likely to visit less often in the future, are distinctive in some ways, for example:

- they are less likely to have visited recently;

- they are less likely to have visited the area immediately around Sizewell C;

- they are more likely to be unaware of Sizewell A, B or C (and have therefore gained the information about the Sizewell C Project from this survey); and

- they are more likely to be female than male.

Summary of potential effects on tourism and visitors

9.7.90 Overall, there is limited empirical evidence that the Sizewell C Project would lead to a quantifiable reduction in visitor numbers, a change in visitor

behaviour, expenditure or business viability in the sector over and above normal variation. The tourist economy is subject to substantial volatility year-on-year, and is affected by externalities beyond the effects of a single project such as Sizewell C.

9.7.91 There is no empirical evidence that the construction of Sizewell B had a substantial effect on the sector within the Suffolk coast area, or that – with a well-managed and effective mitigation package via a Tourism Fund – the construction of Hinkley Point C is having a substantial effect in Somerset.

9.7.92 However, engagement with local tourism stakeholders, review of environmental effects and mitigation identified across this **ES**, and SZC Co.'s understanding of perceived visitor sensitivities based on quantitative survey of previous and potential visitors has identified that without mitigation there is potential for:

- very local effects on businesses and activities where there is a combination of significant residual environmental effects; and
- perception-related effects as a result of sensitivities to different aspects of the Sizewell C Project (the potential for perception of changes to for example. traffic, where this is already an influencer on propensity to visit).

9.7.93 In particular, SZC Co.'s research has shown that visitors with lower levels of engagement and knowledge of nuclear generation at Sizewell or the Suffolk coast area state a higher risk of changes to visiting behaviour during the construction of the Sizewell C Project, and that this is mainly influenced by changes or perceived changes to transport at certain higher sensitivity travel times, as the nature of the market (often shorter breaks and more local c. 2 hour trips) means that good access to and around the area is important to visitors.

9.7.94 The **Transport Assessment** (Doc Ref 8.5) sets out that:

- During the early years of construction, in 2023, before any mitigation is completed, there would be impacts on the highway network particularly on the A12 and B1122. This would mean a change in journey time of up to 5% on some routes, at peak times. This is within the daily variation on these routes, so is unlikely to be noticeable.
- However, when the full highway mitigation package is in place even in the peak construction period, traffic volumes during the peak hours show only small impacts across the network, within the bounds of usual daily variation.

- Across the day, some roads would experience a notable increase in traffic volumes although road capacity would not be exceeded, and the junctions are shown to operate within capacity with the proposed mitigation in place.

- In some locations such as the B1122 through Theberton and Middleton Moor, and the A12 at Farnham and Stratford St. Andrew, significant traffic reductions are anticipated as a result of the proposed bypasses.

9.7.95 As such, in some locations, times and for some visitors, there is the risk of a **minor** to **moderate** adverse effect to arise on factors that contribute to tourist visitor sensitivity (including but not limited to traffic) that has the potential to be **significant** at the local level, without mitigation in the early years of construction.

9.7.96 As set out above, SZC Co. commissioned a survey to understand more about the perceptions of people who have previously visited or intend to visit the area, in order to gain an understanding of the demographic factors and sensitivities that should be tackled to prevent the risk of perceptions of reduced likelihood to visit materialising into an economic effect.

Effects on the agricultural economy

9.7.97 The proposed development would lead to the loss of farming activity, arable land and pasture both temporarily and permanently.

9.7.98 Some land take would occur during the construction period, with land required on a temporary (though long-term) basis to accommodate construction activities or temporary associated development and then restored post-construction.

9.7.99 As set out in **Volume 2, Chapter 17** of the **ES** (Doc Ref. 6.3) and **Chapter 10** of each of **Volumes 3** to **9** of the **ES** (Doc Ref. 6.4-6.10)**,** the Sizewell C Project (including main development site and associated developments) would permanently remove around 125.26ha of known agricultural land of which 84.3 hectares is considered 'best and most versatile' land.

9.7.100 Following the construction phase, land temporarily used for the main development site construction areas will be returned to arable agricultural land, grassland, woodland and scrub, hedgerow and wetland habitats.

9.7.101 Overall, the area of agricultural land permanently removed represents approximately 0.04% of the total c. 330,000ha of agricultural land (grades 1–5) across Suffolk as a whole (Natural England, 2019) (Ref 9.48). As a proportion of the total employment in the agricultural sector in Suffolk, this

would equate to an average loss of around 4 jobs in this sector based on average jobs per hectare in the sector in Suffolk.

9.7.102 Given the very low proportion of jobs that would be lost, the magnitude of the impacts would be very low (insignificant in terms of the sub-regional economy), and the sub-regional economy as a receptor would have very low sensitivity to the proposed changes, resulting in a negligible effect which would be **not significant** in terms of the local and regional economy.

9.7.103 Effects on individual land holdings, including changes to activity, loss of land and severance – and the compensation measures associated with them are set out in **Volume 2, Chapter 17** of the **ES**.

Effects of transport on business

9.7.104 The **Transport Assessment** (Doc Ref. 8.5) assesses the peak traffic generation for Sizewell C on a weekday, and identifies that there are no significant delays caused as a result of Sizewell C across the modelled network, during the peak construction phase.

9.7.105 The assessment identifies that during the early years of construction, in 2023, before any mitigation is completed, there would be impacts on the highway network particularly on the A12 and B1122. This would mean a change in journey time of up to 5% on some routes, at peak times. This is within the daily variation on these routes, so is unlikely to be noticeable.

9.7.106 However, when the full highway mitigation package is in place even in the peak construction period, traffic volumes during the peak hours show only small impacts across the network, within the bounds of usual daily variation. Across the day, some roads would experience a notable increase in traffic volumes although road capacity would not be exceeded, and the junctions are shown to operate within capacity with the proposed mitigation in place. In some locations such as the B1122 through Theberton and Middleton Moor, and the A12 at Farnham and Stratford St. Andrew, significant traffic reductions are anticipated as a result of the proposed bypasses.

9.7.107 The package of road safety improvements put forward in the **Transport Assessment** (Doc Ref. 8.5) would not only benefit the proposed Sizewell C Project, but would also provide a lasting legacy to residents of the surrounding towns and villages. Once the Sizewell C site is fully operational, traffic impacts are negligible with some areas showing improvement as a result of the legacy benefit of the proposed bypasses.

9.7.108 SZC Co. notes that in some instances, changes to the road network associated with the scheme, businesses may perceive a loss of passing trade which they may consider affects their business models. SZC Co. has carefully considered each of the elements of physical mitigation associated

with changes to the transport network to create an overall network that limits significant effects on travel as a result of the Sizewell C Project. People who own and occupy property (including small business premises with an annual value below a set amount) that has been reduced in value by physical factors (e.g. noise and vibration) caused by the use of a new or altered road may be able to claim compensation under the terms of the Land Compensation Act 1973.

iii. Accommodation effects

9.7.109 **Appendix 9A** of this volume identifies the NHB workforce that would be required during the construction phase, and **Appendix 9C** of this volume sets out where they would be estimated to live within a 60-minute travel time of the main development site.

9.7.110 There are uncertainties related to the locations that workers would choose to live, how many NHB workers would be required, and which sectors of the housing market they would choose to live in. The precise location that workers choose would be dependent on a number of factors, including their duration of stay; the price and type of accommodation; access to their permanent homes, park and rides and the main development site (via direct buses); and access to amenities such as sport and leisure, and, in the case of families, schools.

9.7.111 As identified in the baseline, there are substantial 'vacant' bedspaces at any given time, though this is constrained in the peak of the tourist season, and varies from place to place. Assumptions have been made relating to the likelihood/ability for NHB construction workers to take up accommodation in different sectors, for example affordability of tourist accommodation, where a discount has been applied to take account of limited affordability of much tourist accommodation.

9.7.112 As part of the embedded mitigation for the scheme a campus-based accommodation strategy would underpin the development. This would be supported by serviced-spaces for caravan accommodation. Experience at Hinkley Point C (as at April 2019) suggests that the on-site campus provided for the project is popular and sought after by contractors and that civils workers in particular are more likely to seek caravan accommodation.

9.7.113 The delivery of the campus and caravan site would reflect the numbers of workers requiring accommodation in the local area based on the workforce profile.

9.7.114 Use of existing accommodation would be required prior to the completion of any purpose built accommodation provided by SZC Co.

9.7.115 Overall, and noting that a degree of uncertainty is inherent in estimating the accommodation demand that would be generated by the Sizewell C Project, it has been concluded that a total campus provision of around 2,400 bedspaces and 600 caravan bedspaces (assuming a utilisation rate of 1.5 applied to 400 caravan plots) would be provided, for the following reasons which are outlined in more detail in the **Accommodation Strategy** (Doc Ref. 8.10).

9.7.116 As well as the avoidance of impacts on the local accommodation market, the campus accommodation is regarded by SZC Co. as essential because of availability for short stays, the ability to provide high quality and well managed amenities on-site, and the ability to manage workers' effects on the wider area. The on-site campus has additional advantages in that:

- Workers could either walk directly to site or take a very short bus journey within the site compound. This would materially reduce the trips of workers on the local road network.

- An on-site campus would be lower cost due to synergies with establishment of the main development site construction area, and the opportunity to share facilities such as utilities and security. Bussing costs of workers for off-site campus locations would also be avoided.

- An on-site campus would benefit the construction by allowing for a rapid and effective response to any on-site issues or incidents. It would benefit night shifts or those working irregular unsocial hours and assist through periods of construction which require intensive work, e.g. continuous concrete pours. This position was ratified by the preferred Hinkley Point C Civil Contractor during the Hinkley Point C examination process and has been reiterated through lessons learnt sessions with Hinkley Point C contractors and early contractor involvement for the Sizewell C Project.

- Minimising travel times between the accommodation campus and the construction area helps to increase the productivity and efficiency of the workforce through minimising the effective length of their working day and benefitting mental health by providing secure, high quality, safe and accessible accommodation close to work.

9.7.117 Sizewell B provided a successful 900-room on-site campus during construction. In 1990, the Inquiry Inspector stated that there were common sense advantages for a hostel to be located adjacent to the construction site, as this would be considerably more convenient for the occupants and the site operator, and would reduce traffic on the roads. The Inspector weighed the advantages of an on-site hostel against the possible impacts,

including concerns about disturbance to local villages, and concluded that the benefits in providing accommodation for construction workers on-site were tipped in favour, so long as it is properly managed. The on-site campus proved popular, and was regularly at capacity with average waiting lists of over 100 workers.

9.7.118 Caravan accommodation is proving popular at Hinkley Point C and therefore serviced spaces for up to 400 caravans would be created on Land to the East of Eastlands Industrial Estate in Leiston.

9.7.119 This facility would continue to be offered throughout the construction phase, providing an option to workers not wishing to use the accommodation campus or the PRS, owner-occupied sector or local tourist accommodation. Buses would run between the main development site and the caravan site.

9.7.120 An average of 1.5 workers per caravan is assumed, therefore creating a total of 600 construction workers staying at this facility. The number of workers per caravan would depend upon the size of caravans brought to site but an estimate of around 1.5 workers per caravan is considered realistic. Details of the design of the caravan site are set out in the descriptions of development in **Chapter 3** of this volume.

9.7.121 At the peak of construction, 5,884 of the 7,900 workforce would require accommodation locally (within 60-minutes of the main development site). For several years either side of peak construction, accommodation demand generated by the Sizewell C Project is expected to be much less than this.

9.7.122 The scale of the Sizewell C construction workforce, and especially the number of NHB workers who would seek accommodation in the local area, needs to be seen in the context of wider local demographics. The NHB workforce would be relatively small in number when seen in the context of the existing population of Suffolk County (equivalent to 0.7% of current population) or ESC (equivalent to 2.2% of current population).

9.7.123 In order to assess impacts more specifically, each component of the housing market has been considered separately. This includes owner-occupied housing, the PRS, and tourist accommodation. Regard has also been given to the potential supply of 'latent' accommodation, which may reduce the scale of demand in other sectors.

Owner-occupied sector

9.7.124 It is anticipated that by the time of peak construction 882 workers would have moved to owner-occupied properties. Some of these would eventually form part of the operational workforce, others would be long-term construction workers.

9.7.125 The 2011 Census identifies that there were 134,427 family homes (3+ bedrooms) in the owner-occupied sector across the 60-minute area in 2011. Since then the private housing sector has grown by approximately 4% in Suffolk, so this is considered an under-estimate.

9.7.126 As such, Sizewell C workers are likely to account for less than 1% of all family homes in the owner-occupied sector in the area – this is a small fraction of homes, and well within the average level of churn within the sector. Given the length of time these workers are likely to be involved with the Sizewell C Project, this effect would have built up over several years in advance of the peak.

9.7.127 The construction phase of the Sizewell C Project, including peak construction, is therefore expected to lead to a negligible effect overall on the operation of the overall Suffolk housing market, which would be **not significant.**

9.7.128 Workers are likely to concentrate close to the site, and this has been accounted for in ward-level modelling of the workforce by sector within the Gravity Model as set out in **Appendix 9C** of this volume.

9.7.129 **Table 9.40** sets out the effects in wards closest to the site, in the context of average annual change in the market based on household moves by tenure in 2011 (Census).

Table 9.40: Workers in owner-occupied sector accommodation in the context of stock and average annual churn

Local Wards	Workers in Owner-Occupied Sector at Peak (construction only)	Workers in Owner-Occupied Sector at Peak (operational only)	Total Stock (2011 census)	Workers as a % of Total Stock at Peak	Average Annual Build-Up	Average Annual Churn	Workers as a % of Annual Churn
Leiston	107	55	1,339	12.12%	23	102	23%
Aldeburgh	51	26	952	8.09%	11	139	8%
Saxmundham	41	21	1,107	5.57%	9	138	6%
Yoxford	19	10	520	5.56%	4	61	7%
Snape	16	8	518	4.56%	3	52	6%
Rendlesham	17	8	659	3.79%	4	90	4%
Orford and Tunstall.	9	5	449	3.18%	2	65	3%
Walberswick and Wenhaston.	11	6	567	3.04%	2	65	4%

Local Wards	Workers in Owner-Occupied Sector at Peak (construction only)	Workers in Owner-Occupied Sector at Peak (operational only)	Total Stock (2011 census)	Workers as a % of Total Stock at Peak	Average Annual Build-Up	Average Annual Churn	Workers as a % of Annual Churn
Wickham Market.	7	4	474	2.20%	1	4	3%
Halesworth	14	7	1,041	2.04%	3	129	2%

Source: Census, 2011.

9.7.130 This shows that in Leiston (for example), over 100 households in the owner-occupied sector moved in 2011 (Census). Sizewell workers would represent an average of around one in four of those moves in any given year up to the peak of construction. Elsewhere, Sizewell C workers may be expected to account for less than one in ten of annual moves per area.

9.7.131 As such, this impact is considered as being negligible at all spatial scales except for Leiston where there may be a minor adverse effect resulting in higher than usual demand for family-type accommodation for several years towards the peak. These effects would be **not significant.**

Private rented sector

9.7.132 It is anticipated that by the time of peak construction 1,200 workers would be living in private rented properties across the 60-minute area. The PRS provides options for construction workers in medium-term roles, as the shortest period for an assured shorthold tenancy is 6 months.

9.7.133 As set out in **section 9.4** of this chapter, there is a significant stock of homes and bedspaces in the sector – in 2011 there were over 99,000 bedspaces in the 60-minute area, and based on average national and regional growth rates, this may have since risen to over 128,000.

9.7.134 As such, Sizewell C workers are likely to account for up to around 1.2% of all bedspaces in the area – this is well within the overall calculated level of 'frictional vacancy' within the sector, and is therefore expected to lead to a negligible effect overall at the 60-minute area scale, which is **not significant.**

9.7.135 **Table 9.41** sets out the scale of workforce seeking PRS accommodation in the context of overall stock, vacancy and churn.

Table 9.41: Macro-level effects – non-home-based workers seeking private rented sector accommodation in the 60-minute area

Construction Workers at Peak				
(a)	Total NHB workers excl. project accommodation (campus and caravans).	2,884		
(b)	Of which seeking PRS accommodation.	1,200		
PRS Stock and Characteristics				
(c)	Total Stock of PRS Bedrooms (2011 Census).	99,033		
(d)	Total Stock of PRS Bedrooms (2019 estimate based on Strategic Housing Market Area and EHS).	128,743		
Vacancy Rates		**%**	**2011 Census**	**Potential Including Growth Since 2011**
(e)	Vacancy Rates (National – EHS 10-year average).	10.0%	10,200	13,261
(f)	Vacancy Rates (Suffolk Coastal – Strategic Housing Market Area).	8.3%	8,220	10,686
(g)	Vacancy Rates (Waveney – Strategic Housing Market Area).	6.9%	6,833	8,883
Turnover Rate		**2011 (Census) Turnover Rate in PRS in East Suffolk**		
(h)	Monthly turnover in the PRS.	2.8%		
Output		**% Spare**	**Est 'Spare' Capacity**	
(i)	Potential 'spare' capacity (est. lower range based on 2011 Census).	4.1%	4,060	
(j)	Potential 'spare' capacity (est. upper range based on potential PRS growth since 2011).	7.5%	9,656	

Source: Census, 2011; EHS, 2019; Coastal SHMA; Waveney SHMA

9.7.136 Although (as set out above) at this wider scale effects are not significant, workers are likely to concentrate close to the site, and this has been accounted for in ward-level modelling of the workforce by sector within the Gravity Model, as shown in **Appendix 9C** of this volume.

9.7.137 **Table 9.42** sets out the number of workers anticipated to seek PRS accommodation in the ten wards closest to the site, in the context of the overall stock and the frictional vacancy at ward scale.

Table 9.42: Workforce estimate in context of private rented sector stock and capacity in wards closest to the site

Local Wards	Workers at Peak in PRS	PRS Beds (2019 estimate)	% of PRS Bed Stock Taken	Frictional Vacancy Est.[8]	Exceedance of Frictional Vacancy	% of Frictional Vacancy
Leiston	392	1,461	27%	117	275	336%
Aldeburgh	105	706	15%	53	53	200%
Saxmundham	87	946	9%	67	20	130%
Rendlesham	54	957	6%	74	-20	72%
Yoxford	40	424	9%	32	-8	125%
Snape	31	456	7%	33	-3	92%
Halesworth	24	595	4%	48	-24	50%
Orford & Tunstall.	26	966	3%	72	-46	36%
Sutton	18	1,262	1%	103	-84	18%
Framlingham	16	1,100	1%	78	-62	20%

9.7.138 This analysis highlights that:

- in Leiston, Aldeburgh, Saxmundham and Yoxford the demand for PRS from the Sizewell C workforce is anticipated to exceed the frictional vacancy leading to potential major adverse effects that would be **significant** prior to mitigation. The most significant effects are identified in Leiston and Aldeburgh;

- in Rendlesham and Snape, the demand for PRS from the Sizewell C workforce is anticipated to account for between 50% and 100% of the frictional vacancy in the peak year – this is considered within the capacity required for the sector to operate, though has been highlighted as a potential risk and is considered a moderate adverse effect that would be **significant** prior to mitigation; and

- in Halesworth, Sutton, Orford & Tunstall and Framlingham, the demand for PRS from the Sizewell C workforce is anticipated to account for less than 50% of the frictional vacancy in the peak year – this is considered within the capacity required for the sector to operate and is considered a low risk that may cause minor adverse effects, that would be **not significant.**

[8] using EHS national vacancy rate for PRS and ward-level turnover rate

9.7.139 SZC Co. recognises that pre-existing housing characteristics and pressures may exacerbate vulnerability in some locations – particularly Leiston. The **Accommodation Strategy** (Doc Ref. 8.10) sets out how particular sensitivities have been identified between SZC Co. and ESC.

Tourist sector

9.7.140 It is anticipated that at the peak of construction there would be 802 workers seeking accommodation in the tourist sector within the 60-minute area.

9.7.141 As set out in **section 9.5** of this chapter and **Appendix 9D** of this volume, it is estimated that there is likely to be substantial vacancy on average across the year and even at peak months in tourist accommodation across the 60-minute area.

9.7.142 On this basis, workers seeking accommodation have the potential to generate income for tourist accommodation providers where accommodation may otherwise be unoccupied, presenting a minor beneficial effect at the 60-minute area scale, particularly during off-peak months.

9.7.143 However, SZC Co. notes that there are sensitivities within the market in terms of:

- the location of tourist accommodation – much of which is located towards the coast; and
- the location and variability in price and availability of different types of tourist accommodation, which affects occupancy.

9.7.144 This has the potential to lead to more significant local pressures on tourist accommodation.

9.7.145 **Table 9.43** sets out the number of workers predicted to seek tourist accommodation in areas close to the site at peak, set against the available and affordable stock.

Table 9.43: Workforce estimate in context of available and affordable tourist accommodation stock and capacity in wards closest to the site

Local Wards	Workers in Tourist Accommodation at Peak	Total Beds	% of Stock Used by Workers	Available/ Affordable Beds	% of Stock Used by Workers
Aldeburgh	462	1,691	27%	1,049	44%
Leiston	135	333	41%	160	84%
Yoxford	73	605	12%	335	22%

Local Wards	Workers in Tourist Accommodation at Peak	Total Beds	% of Stock Used by Workers	Available/ Affordable Beds	% of Stock Used by Workers
Saxmundham	55	423	13%	233	24%
Snape	21	411	5%	161	13%
Walberswick and Wenhaston	16	373	4%	263	6%
Southwold and Reydon	13	1,015	1%	833	2%
Orford and Tunstall	8	205	4%	126	6%
Kessingland	5	3,902	0%	1,040	0%
Hollesley with Eyke	2	274	1%	151	1%

9.7.146 This suggests that:

- Workers in Aldeburgh and Leiston may seek tourist sector accommodation equivalent to up to around 27% and 41% of the overall stock respectively.
- When discounting for availability/affordability, workers may occupy around 44% of stock available and affordable to them in Aldeburgh, and 84% in Leiston. This has the potential to result in a moderate, or major adverse effect on the accommodation sector in these locations at peak which would be significant, prior to mitigation. This assessment does not take into account the responsiveness and flexibility of the market – it assumes it is static and reflects the situation as presented in the baseline in **section 9.5** of this chapter.
- Elsewhere, negligible to minor adverse effects may occur in Yoxford, Saxmundham and Snape, though in the context of the overall stock and type of accommodation, these effects are likely to be minor and short-lived and would be **not significant.**

9.7.147 Some concern has been expressed through consultation and engagement around the potential displacement of tourists from accommodation, who are likely to have higher average daily expenditure than workers (on goods and services, not including accommodation). In effect however, this would be a commercial decision for accommodation providers, who decide whether to let accommodation to workers – within any planning or other regulatory restrictions with which they must comply.

9.7.148 The assessment suggests there would be capacity in tourism accommodation even in peak season and, where this is the case, expenditure would be additional. Even if there were to be a small level of displacement in the summer in some locations, this would likely be balanced by the benefits to providers outside of the peak season. Effects on the tourist economy more generally are assessed in **section 9.7(b)** of this chapter. Experience at Hinkley Point C (based on monitoring up to 2019) suggests that "*predictions* [made within the Socio-economic chapter of the Environmental Statement for Hinkley Point C] *for those in tourist accommodation are therefore fairly accurate at this point in time*" (Ref. 9.47).

Latent sector

9.7.149 Latent accommodation includes un-rated (i.e. not included in Visit East Anglia's database used to inform the Gravity Model) tourist accommodation, rooms for let in private homes, currently empty homes, and accommodation new to the market each year. This type of accommodation would offer an opportunity to mitigate negative effects on tourist and PRS capacity, as well as allowing local residents to benefit economically, for example, by renting out spare rooms.

9.7.150 At present, the Gravity Model makes no assessment of the likelihood of workers using latent accommodation. The stock of latent bedspaces is likely to follow the general distribution of the overall stock in family homes, rented, social rented and tourist accommodation.

9.7.151 Feedback from Hinkley Point C suggests that this type of accommodation is very popular with workers, with around 10%, of NHB workers using spare rooms in existing homes. As such, the figures presented above for worker uptake of accommodation in the PRS and tourist sectors may be considered an upper-estimate should these levels of latent accommodation be achieved.

9.7.152 Further information on the potential for the use of latent accommodation – particularly in terms of bringing empty homes back into use, and making more efficient use of existing stock, is set out in the **Accommodation Strategy** (Doc Ref. 8.10).

iv. Population change and dynamics

9.7.153 The population and demographic structure of the 60-minute travel area is likely to experience a level of change associated with the presence of a NHB construction workforce.

9.7.154 Based on assumptions set out in technical notes appended to this chapter, there would be an overall increase of 5,884 NHB workers within the 60-minute area at peak.

9.7.155 **Table 9.44** sets this distribution against average annual population turnover (new residents taken from Census 2011 data) to identify the proportion of NHB workers compared with 'usual' turnover.

Table 9.44: Non-home-based workers as proportion of annual new residents

Geography	Total New Residents in 2011	NHB Construction Workers at Peak	Annual Average Build-Up to Peak	NHB Construction Workers as % of New Residents in 2011
Local Wards				
Leiston	370	3,689	527	142%
Saxmundham	432	203	29	7%
Snape	172	76	11	6%
Yoxford	185	141	20	11%
Aldeburgh	293	644	92	31%
District				
East Suffolk.	10,068	5,580	797	8%
Great Yarmouth.	3,241	37	5	0%
South Norfolk.	7,016	61	9	0%
Mid Suffolk.	5,242	83	12	0%
Ipswich	7,513	97	14	0%
Babergh	4,688	27	4	0%
Other Scales				
60-minute area.	25,179	5,884	841	3%

Source: Census, 2011

9.7.156 **Table 9.44** demonstrates that the area which would have the largest proportionate population impact would be the local ward areas adjacent to the site – particularly Leiston – principally because of the Sizewell C Project accommodation (campus and caravan site).

9.7.157 This would likely lead to temporary (medium term) major impacts at the local ward level (Leiston) which would be **significant.** Other local wards (Aldeburgh) could also see moderate temporary (medium term) impacts in terms of population growth. Impacts are likely to be minor or negligible and **not significant** for all other areas.

9.7.158 It is not possible to identify the extent to which a population impact is beneficial or adverse, without considering the specific impacts which that

net additional population might have on public services and community cohesion, integration and sustainability, which are considered in the following sections.

v. Public services and community facilities

9.7.159 The introduction of a new NHB workforce into the 60-minute area could have impacts on demand for public services and community facilities, and the ability of service providers to respond. Demand would vary between different types of service depending on the demographic profile of the workforce (particularly age and gender) and the location of workers.

9.7.160 Current services in the area of relevance to the Sizewell C workforce may be split between the following key service providers and topic areas:

9.7.161 SCC:

- Education and social services.
- Regulatory and environmental services.
- Economic development and tourism.
- Libraries.
- Emergency planning.
- Public Health.

9.7.162 District Councils – mainly East Suffolk:

- Housing.
- Leisure.
- Economic development and tourism.
- Regulatory and environmental services.
- Emergency planning.

9.7.163 Emergency Services:

- Policing (Suffolk Constabulary).

- Fire (Suffolk Fire and Rescue).
- Ambulance (East of England Ambulance Service).
- Coastguard.

9.7.164 Health:

- Clinical Commissioning Group (NHS Ipswich and East Suffolk Clinical Commissioning Group) – commissioning services.

9.7.165 With the exception of health services, all other services are funded by a combination of council tax and central government grants and fees. Health services are funded by a grant formula from central government.

9.7.166 Where workers are living in accommodation where they pay council tax, this should in effect self 'mitigate' the impacts of their demand, and similarly where there are fees and charges for services (e.g. leisure). In theory, central government grant formulae should also respond to a changing population, however they are generally based on population estimates which do not take into account short-term migrant workers and funding may be slow to adjust.

9.7.167 It should be noted more broadly that migrant construction workers generally make a net contribution to the national exchequer on the basis that they are in work and generally of age groups (younger), and in household types (with few dependants) that make less demand on public services, for example on social services, education and acute healthcare.

9.7.168 The assessment of the key service areas below therefore identifies a 'gross' impact, based on the workforce model and spatial spread, and then a net impact on the basis of 'automatic mitigation' by services provider, and management proposals by SZC Co. for certain services. It is against the latter assessment that significance criteria are attached and any mitigation measures required.

9.7.169 This section covers all of the services listed above with the exception of Housing Services and Tourism and Economic Development (which are covered in preceding sections).

Pre-school and education – gross effects

9.7.170 Demand for education provision may arise from the children of NHB workers. **Table 9.45** shows the possible spread of workers bringing families at peak, based on:

- the owner-occupied component of the Gravity Model set out in **Appendix 9C** of this volume; and

- the number and age of children workers in this type of accommodation are predicted to bring with them based on survey information from Hinkley Point C set out in **Appendix 9B** of this volume.

9.7.171 Experience from Sizewell B and Hinkley Point C suggests that workers bringing families are likely to arrive earlier and stay longer, so it is likely that these families would build up over the period leading up to the peak.

9.7.172 The distribution of workers with children is likely to follow the spatial distribution of NHB workers in the owner-occupied sector set out in **Appendix 9C** of this volume.

Table 9.45: Spatial spread of family-type households with children in NHB workforce

Geography	Distribution of Workers In Owner-Occupied Sector at Peak	Pre-school	Primary School	Secondary School
Local Wards				
Leiston	18.7%	30	31	5
Saxmundham	7.1%	11	12	2
Snape	2.7%	4	5	1
Yoxford	3.3%	5	6	1
Aldeburgh	8.9%	14	15	3
District				
East Suffolk	83.8%	139	146	25
Great Yarmouth	1.9%	5	5	1
South Norfolk.	3.5%	9	9	2
Mid Suffolk	5.0%	12	12	2
Ipswich	4.3%	11	12	2
Babergh	1.6%	4	4	1
Other/Wider Scales				
Suffolk	94.6%	166	175	31
60-minute area	100%	180	190	33

Pre-school provision

9.7.173 Based on estimates of children of pre-school age taking up residence within the area as a result of the NHB worker population at peak, there are predicted to be between 166 pre-school aged children in Suffolk, of which around 139 would be in East Suffolk.

9.7.174 As such, against the assessed levels of sufficiency and existing and planned provision set out in **section 9.5** of this chapter, the impact at district-level and county-level is considered to be negligible and **not significant.**

9.7.175 The greatest local effects are anticipated to occur in Leiston with up to 30 estimated pre-school children at peak. Based on existing provision and childcare sufficiency set out in **section 9.5** of this chapter, local impacts are considered to be minor adverse and **not significant.**

Primary and secondary school provision

9.7.176 The way education demand interacts with current and projected education capacity depends whether the children are net additional to current demand.

9.7.177 It is likely that families living in owner-occupied family accommodation would be included in current and future projections as they would be part of the overall housing market 'churn'. Families living in the PRS however may contribute to net additional demand for school places.

9.7.178 In either case the 'revenue' cost of providing for additional pupils is formula-based and these households would also be paying council tax. Therefore the only impact would be if additional 'physical capacity' was required to meet demand, or if high levels of turnover or mobility put increasing pressure on school resources.

9.7.179 At a wider scale, the estimated 190 primary school aged children, even if all considered 'net additional' would have a negligible effect on existing capacity across the 60-minute area. Taking into account SCC forecasts for growth related to development and natural change (see **Table 9.29**) this would still be negligible at this scale.

9.7.180 However, it is noted that these effects may be localised as a result of the potential for workers to seek accommodation closer to the site. **Table 9.46** outlines the current primary school capacity in wards local to the site, and identifies the possible impact at each locality of the forecast child population if they were all net additional.

Table 9.46: Primary education capacity change as a result of forecast population increase (primary school places)

Geography	Potential SZC-Related Primary Age Children	Existing Capacity	Existing Surplus Capacity (#)	Existing Surplus Capacity (%)	Residual Surplus Capacity (#), If all SZC-Related Children Are Net Additional	Residual Surplus Capacity (#), If all SZC-Related Children Are Net Additional
Local Wards						
Leiston	31	525	165	31%	134	25.5%
Saxmundham	12	483	38	8%	26	5.4%
Snape	5	175	30	17%	25	14.5%
Yoxford	6	175	71	41%	65	37.4%
Aldeburgh	15	105	2	2%	-13	-12.3%
Wider Scales						
East Suffolk	146	15,560	2,014	12%	1,868	12%
60-minute area	190	25,416	3,123	12%	2,933	12%

9.7.181 As set out in **Table 9.29**, using SCC forecasts for demographic and housing related population change (though not including planning obligations delivering additional capacity), the above effects would be magnified, potentially leading to an exceedance of capacity in Leiston and Snape (noting that schools in Snape would already be at capacity).

9.7.182 **Table 9.47** outlines the current secondary school capacity in wards and Districts[9] across the 60-minute travel area, and identifies the possible impact at each locality of the forecast child population if they were all net additional.

Table 9.47: Secondary education capacity change as a result of forecast population increase (secondary school places)

Geography	Existing Capacity	Existing Surplus Capacity (#)	Existing Surplus Capacity (%)	Possible Secondary School-Aged Children (SZC)	Remaining Surplus Capacity If All Net Additional
Local Wards					
Leiston	560	166	30%	5	29%

[9] SZC Co. notes that SCC uses school planning areas for assessments of demand for places – however these areas are not based on 2011 Census Wards and therefore direct comparison to the outputs of the Gravity Model are not possible.

Geography	Existing Capacity	Existing Surplus Capacity (#)	Existing Surplus Capacity (%)	Possible Secondary School-Aged Children (SZC)	Remaining Surplus Capacity If All Net Additional
Saxmundham	600	126	27%	2	27%
Snape	--	--	--	1	--
Yoxford	--	--	--	1	--
Aldeburgh	--	--	--	3	--
Wider Scales					
East Suffolk	10,766	1,118	10%	25	11%
60-minute area	19,917	2,453	12%	33	12%

9.7.183 On this basis, assuming that the above represents a likely worst-case scenario (where all additional children are considered net additional), the NHB workforce could have a negligible effect at the 60-minute level, and at county and district levels, which would be **not significant.**

9.7.184 There is the possibility for a moderate adverse effect in terms or primary school capacity in Aldeburgh, based on current schools having little or no existing surplus capacity. However, within the context of small workforce children numbers, a slow ramp-up, falling birth rates and planned expansion this is likely to be **not significant** in the context of the dynamic baseline, and the net additionality of workers in this category.

9.7.185 It should be noted that as a result of decreasing birth rates – a national trend also experienced in most parts of Suffolk – school rolls at primary school level are anticipated to drop and spare capacity grow in future years. This is a background trend and would need to be considered in monitoring and planning any mitigation measures.

9.7.186 As set out in **Table 9.29**, forecasts provided by SCC identify that at around the peak of construction, there is the potential for primary schools in local wards to be operating very close to capacity. This forecast identifies very high levels of growth related to demographic change and housing growth, without factoring in additional supply driven by collection and implementation of planning obligations.

9.7.187 SZC Co. recognises that there is inherent uncertainty regarding future demand for school places, which is influenced by population factors and development. SCC are required to seek planning obligations for public services including education provision through Section 106 agreements and/or Community Infrastructure Levy regulations from development which

generates net additional change in the housing stock and therefore additional population.

9.7.188 However, in recognition that there may be a period during which funding for additional capacity from those sources catches up with demand and provision, SZC Co. will work with SCC throughout the construction phase to identify changes in capacity and demand from construction workers, and where applicable, mitigate those effects via a public services contingency fund to be secured through the Section 106 Agreement.

Social services – families

9.7.189 SCC's Social Services expenditure on children and families and may be affected by an additional 'family' population. Assumptions about the number of dependent children, and non-dependent adults likely to accompany workers at peak are set out in **Appendix 9B** of this volume.

9.7.190 It is anticipated that all family households would live in accommodation through which they would pay council tax. Those living in owner-occupied accommodation are unlikely to be additional to the current population. Net additional impact on demand for social services from workers, and their families is therefore regarded as negligible and **not significant** at all levels.

Social services – construction workers

9.7.191 SZC Co. has worked with SCC to understand existing pressures on the provision of services to support vulnerable adults, families and children in terms of the location of demand or services, and the potential effect that a NHB construction workforce may have on service delivery and perceptions of workers within the community.

9.7.192 Engagement with SCC, health stakeholders and individual service providers has identified a number of concerns, primarily related to changes in the population profile – particularly in Leiston – due to the number and narrow demographic of construction workers. These concerns are summarised here:

- potential risks to vulnerable young people and care leavers, particularly in Leiston, and particularly those who are in housing need or vulnerable to homelessness;
- potential risks related to cultural differences between NHB construction workers and residents;

- potential risks related to drugs, alcohol and prostitution including exploitation of young girls by a predominantly male workforce, and potential for related increase in trafficking;
- potential risks related to access to and delivery of sexual health services and increase in youth pregnancy;
- potential risks on the delivery of services, particularly to vulnerable older people who wish to remain in their homes but require care; and
- potential demand for social services and mental wellbeing services from construction workers and their families, and welfare in schools such as English as an Additional Language.

9.7.193 SZC Co. recognises that there may also be economic-based risks to service provision as an indirect result of job creation on the Sizewell C Project, which may lead to workforce churn that means some positions in care roles become harder to fill.

9.7.194 SZC Co. recognises that the Sizewell C Project has the potential to increase the risks set out above, and has identified mitigation measures in order to avoid or reduce the risks through direct interventions including:

- Linking implementation strategies with priority social services target groups, for example so that outreach programmes target children not in education, employment and training (NEETs) and other vulnerable groups – see **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9). The measures within the **Employment, Skills and Education Strategy** would be secured by a Section 106 Agreement.
- Supporting community engagement as set out in the **Code of Construction Practice** (**CoCP**) (Doc Ref. 8.11), to address any issues that may arise from members of the public and especially vulnerable residents who access key public services.
- Working bilaterally with those organisations closest to the Sizewell C Project that raise safeguarding concerns to identify practical and effective solutions built in to a **Community Safety Management Plan** (Doc Ref. 8.16) and Worker Code of Conduct.
- Providing community information and worker information to promote integration and awareness via 'welcome packs' for contractors and workers and briefings for public service providers.

- Embedding vetting and security checks into recruitment and contracting, as set out in the **Community Safety Management Plan** (Doc Ref. 8.16).

- Managing workforce accommodation and building in measures to reduce risks in the design – including provision for emergency services presence, welfare, food/drink and recreation activities for workers at the accommodation campus, and physical and temporal separation of use of shared recreational facilities in Leiston.

- The provision of occupational healthcare for workers at the main development site including mental wellbeing services – this is set out in more detail in **Volume 2, Chapter 28** of the **ES**.

9.7.195 As a result of the mitigation, the Sizewell C Project is likely to have a negligible effect on the provision of social services at county level (Suffolk), though more localised effects in areas such as Leiston may be minor adverse.

Other county-level services

9.7.196 Due to the demographic profile of the NHB workforce – mainly single, male and of working age – their likely shift patterns, and the temporary nature of much of the workforce – impacts on other SCC run services for example libraries, arts and other cultural services are assumed to be negligible.

Formal sport and leisure

9.7.197 The NHB workforce is likely to create some additional demand for formal sport and leisure provision.

9.7.198 In order to assess the overall scale of the potential demand for formal sport and leisure services, the anticipated demographic profile of the NHB workforce has been applied (with caveats) to:

- Sport England's Sports Facilities Calculator, both for the peak and the average workforce, to identify the likely demand for provision; and

- local authority standard rates for sports facility demand.

9.7.199 Details of the audit of existing provision, approach to assessing demand based on published standards and in terms of local demand and demographic specific demand are set out in **Appendix 9E** of this volume.

9.7.200 This highlights the overall requirements for formal sport and leisure facilities across the 60-minute travel area arising from the NHB workforce in terms of facilities and proportions of facilities.

9.7.201 Sport England has produced typologies of demand for a wider range of sports, based on key demographics such as age, gender and employment. For the demographic of NHB workers, football and going to the gym are by far the activities most in demand, along with cycling which is undertaken by a much smaller proportion. There is very limited demand for swimming and racquet sports.

9.7.202 Demand for sports facilities is predicted to be very modest, and is likely to be able to be met from existing provision. The exception to this is where there is already a significant deficiency in sports provision by type, or location, for example synthetic pitches, although the increased demand would in any case be small.

9.7.203 Those workers living in PRS and owner-occupied sector accommodation would contribute to the revenue costs of service provision through council tax. In addition, most council leisure services are subject to fees and charges and users would therefore be making a net contribution to that provision.

9.7.204 SZC Co. would also provide sports and leisure facilities as part of the Sizewell C Project. This would include gym and informal recreation facilities at the accommodation campus, and formal recreation facilities including a full-size 3G pitch and MUGAs located off-site at Alde Valley School. The off-site facilities would be made available for shared used by the school and the local community and would remain as a legacy post-construction.

9.7.205 This would meet the main likely preferences of the construction workforce. The impact on leisure provision is therefore likely to be major beneficial and **significant** at all levels, as a result of meeting workforce demand and providing permanent new facilities for the community.

Regulatory and environmental services

9.7.206 The district council (ESC) provides a range of regulatory and environmental services. These include:

- Waste collection.
- Street cleaning.
- Food safety, health and safety, pest control and public health.

9.7.207 It is likely that a net temporary increase in population would require a proportionate increase in the delivery of these types of services although there is no detailed method for identifying impacts on specific services.

9.7.208 Those workers living in PRS and owner-occupied sector accommodation would already be paying for these services through council tax. In addition, all accommodation providers (including the campus and caravan site, and tourist accommodation providers who may pay business rates) would be required to pay for waste collection. As set out in the **Sizewell C Waste Management Strategy** in **Volume 2, Chapter 8** of the **ES**, SZC Co. will seek to reach an agreement with a commercial waste contractor to collect waste from accommodation campus and caravan facilities.

9.7.209 There may be a small increase in demand for services other than waste collection – which the facilities manager or SZC Co. would be required to pay for – as a result of workers living in project accommodation (i.e. campus or caravan sites), and temporary accommodation in the tourist sector. The proportion of the peak workforce who would live in these types of accommodation represents a temporary increase in population of less than 2% in ESC district at peak, and this would therefore represent a negligible effect at the local level.

9.7.210 Due to the location of project accommodation, and the propensity of workers to live as close to the site as possible, there is likely to be a local concentration of workers in Leiston and other wards to the east of the A12. In these areas, the change is likely to be greater as set out in **Table 9.48**. However, as services are provided at a Local Authority (District) scale, it is not relevant to consider the local significance of effects.

Table 9.48: NHB workers in non-council-tax accommodation

Geography	NHB Workers in Non-Council-Tax Accommodation	Total Population (2017)	NHB Workers in Non-Council-Tax Accommodation as a Proportion of Total Population
Local Wards			
Leiston	3,135	6,472	48.4%
Saxmundham	55	5,625	1.0%
Snape	21	1,957	1.1%
Yoxford	73	1,977	3.7%
Aldeburgh	462	3,230	14.3%
Districts			
East Suffolk	3,801	246,900	1.5%
Great	0	99,400	0%

Geography	NHB Workers in Non-Council-Tax Accommodation	Total Population (2017)	NHB Workers in Non-Council-Tax Accommodation as a Proportion of Total Population
Yarmouth			
South Norfolk	0	135,500	0%
Mid Suffolk	0	101,500	0%
Ipswich	0	138,500	0%
Babergh	0	90,800	0%
Other/Wider Scales			
Suffolk	3,801	757,000	0.5%
60-minute area.	3,802	316,683	1.2%

Source: ONS mid year population estimates, 2018

vi. Crime, anti-social behaviour and policing

9.7.211 An increase in population arising from the NHB workforce could have impacts on crime and anti-social behaviour, and consequent impacts on the requirement for policing services.

9.7.212 Likely impacts on crime are difficult to estimate as they would depend on both the behaviour of workers and the behaviour of current residents.

9.7.213 Using the experience of construction of Hinkley Point C and Sizewell B stations as a guide, there are indications that some increases above the norm in petty crime and behavioural offences, such as drunkenness, minor public disorder, and car theft could occur. Local experience at Sizewell B noted that the introduction of appropriate mitigation measures meant that rates fell even with major increases in the construction workforce.

9.7.214 Increases in traffic could increase road accidents – this is considered in **Chapter 10** of this volume and the **Transport Assessment** (Doc Ref. 8.5). **Chapter 10** and the **Transport Assessment** set out that:

- When the full highway mitigation package is in place even in the peak construction period, traffic volumes during the peak hours show only small impacts across the network, within the bounds of usual daily variation.

- Across the day, some roads would experience a notable increase in traffic volumes although road capacity would not be exceeded, and the junctions are shown to operate within capacity with the proposed mitigation in place.

- However, the B1122 through Theberton and Middleton Moor, and the A12 at Farnham and Stratford St. Andrew, show significant traffic reductions as a result of the proposed bypasses.

- Journey times across the network could increase slightly on some routes, though in the majority of cases the increases would be indistinguishable from daily variation in travel time.

- On some routes journey times would reduce significantly as a result of the proposed mitigation.

- During the early years of construction, in 2023, before any mitigation is completed there would be significant effects on the highway network particularly on the A12 and B1122, so there would be a need to bring forward delivery of the major highway schemes as soon as practical i.e. A12 / B1122 roundabout, two village bypass and the Sizewell link road.

- During construction, there will be large components which will be transported by road in the form of abnormal indivisible loads. In order to mitigate the potential disruption associated with these large and slow-moving vehicles, regular liaison with the emergency services and the highway authorities will enable the effective management of these deliveries. Details of these measures are provided in the **Construction Traffic Management Plan** (**CTMP**) (Doc Ref. 8.7).

- In the event of traffic disruption on the network, the **Traffic Incident Management Plan** (**TIMP**) (Doc Ref. 8.6) will mitigate the potential exacerbation of traffic delays.

- The package of road safety improvements put forward in the **Transport Assessment** would not only benefit the proposed Sizewell C Project, but would also provide a lasting legacy to residents of the surrounding towns and villages. Once the Sizewell C site is fully operational, traffic impacts are negligible with some areas showing improvement as a result of the legacy benefit of the proposed bypasses.

9.7.215 SZC Co. has been working with Suffolk Constabulary to anticipate the potential effects that might occur, on the assumption that a small proportion of NHB workers and their families, like the current population, could be both perpetrators and victims of crime.

9.7.216 As noted in the baseline assessment, rates of crime and disorder vary between different parts of the county with lower rates in the more rural areas and higher rates (although at or slightly below the national average) in urban areas and areas with a higher rate of deprivation.

9.7.217 **Section 9.5** of this chapter identifies that there were 54,124 total recorded crimes in Suffolk in 2018, at a rate of 71.5 crimes per 1,000 population per year. It should be noted that a substantial proportion relate to domestic violence – which has been raised as a potential concern at Sizewell C through engagement with Suffolk Constabulary.

9.7.218 Application of overall rates in Suffolk to the peak NHB workforce and their families – 5,884 NHB workers at peak – would equate to a proportional increase of 0.8% of current recorded crimes in Suffolk at the peak year of construction, if there is a direct proportional relationship between population and recorded crime.

9.7.219 For the average annual NHB workforce across the construction period, this would equate to an increase of around 0.4% of current recorded crimes per year if there is a direct proportional relationship between population and recorded crime.

9.7.220 Police services are paid for through a combination of central government funding (around 70%) and council taxes collected locally. The central funding is disaggregated based on a range of demographic, social, economic and crime indicators.

9.7.221 NHB workers living in the PRS and owner-occupied sector, and all households with families and dependants, would have their services funded through normal mechanisms like any other local resident. They would in most cases be occupying accommodation that would otherwise be occupied by other residents.

9.7.222 This would leave a potential net increase of around 0.5% of current recorded crimes at peak if there is a direct proportional relationship between population and recorded crime.

9.7.223 There is the potential for crime and disorder to be concentrated in locations where there would be a significant concentration of NHB workforce. It is anticipated that the majority of workers in non-council-tax accommodation at peak would be living either in project accommodation or tourist accommodation close to the site, so the majority of these effects would occur in the Leiston neighbourhood area.

9.7.224 If the recorded crime rates are applied to the number of NHB workers and their families in this area, prior to any mitigation this may lead to an increase in recorded crimes of up to 19.5% at the peak.

9.7.225 Therefore, before mitigation, there could be a moderate adverse effect which would be **significant** at peak at the local scale. The effect would be negligible and **not significant** in all other areas and at wider scales.

9.7.226 There would be a number of mitigating factors leading to the potential increase in local recorded crime being substantially reduced, including embedded design measures and tertiary measures such as the **Worker Code of Conduct.**

9.7.227 Additionally, experience from monitoring at Hinkley Point C (Ref 9.47) (which draws on Avon and Somerset Constabulary data (2018); SEAG Dashboard - Community Safety; and a 'fear of crime' survey) has identified that (partly as a result of mitigation measures and workforce management) - *précis:*

- In the period Dec 2016 to Dec 2018, a total of 202 instances of reported crime have been linked directly to the Hinkley Point C Project; a general increase in reported crimes over the 2016–18 period, with the exception of sexual assault, which was relatively stable. This follows national trends.
  - The trends in the Hinkley zone are not exceptional to the trends in Somerset as a whole, and hate crime in the Hinkley Zone declined in the latest quarter, contrary to a countywide increase.
  - In mid-2017, Avon and Somerset Constabulary noted a small increase in criminal and non-criminal activity resultant of, and against the Hinkley Point C workforce.
  - The level of criminal activity linked to Hinkley Point C and instances of non-criminal activity linked directly to Hinkley Point C did increase more substantially in the period from mid-2017 to mid-2018, but the increase was less than proportionate to the size of the workforce increase.
- Overall, the Worker Code of Conduct appears to be working effectively.
- There is a biennial Sedgemoor District Council survey on fear of crime. The Community Safety Dashboard reports no increase in the fear of crime locally over the construction period. Data from the Sedgemoor Crime and Anti-Social Behaviour Report confirms this, comparing 2017 with 2015. The percentage of Sedgemoor residents who feel very/fairly safe at home during the day has dropped by one percentage point between 2015 (95%) and 2017 (94%).

- A particularly anticipated local concern was the impact of a largely male workforce on the local night time economy, especially in Bridgwater. Whilst there have been some reported episodes, overall the recorded level of crime in Bridgwater Town Centre has shown a fall rather than an increase over the 2016–2018 period from 216 in the 6-month period to December 2016 to 131 in the six month period to December 2018. The number of recorded crimes for the Stogursey Parish, adjacent to the site, has also remained consistently low (between 2 and 11 crimes per 6 month period) over this timescale.

- There has been an issue with fly parking in 2018, causing public concern and high levels of complaints in several locations.

9.7.228 This feedback suggests that potential crime rate increases and their significance rating identified above may be considered an overestimate, and that mitigation proposals would be effective to reduce the significance.

9.7.229 SZC Co. recognises through engagement with Suffolk Constabulary, that recorded crimes (the metric used in this assessment) are only one contributor towards police resourcing, and that information on response to non-reported incidents and dealing with crimes not categorised by the Home Office definitions can lead to greater demand for police resourcing.

9.7.230 Potential effects related to major accidents and disasters, and measures to reduce, avoid or mitigate them are set out in **Volume 2, Chapter 27** of the **ES**, Major Accidents and Disasters.

vii. Fire and rescue service

9.7.231 The construction phase of Sizewell C could potentially impact on the Suffolk Fire and Rescue Service in three ways:

- potential incidents on the site, increasing both demand and type of incidents the service is required to respond to (and therefore demand for different skillsets);

- any increase in demand arising from the temporary increase in population caused by the construction workforce; and

- any increase in demand for community information and awareness training (e.g. home safety checks, traffic awareness talks in schools).

9.7.232 It is not possible to quantify these impacts as they would be based on responses to specific incidents, or would be ad-hoc, service level decisions regarding the provision of information and awareness to the community.

9.7.233 In relation to on-site incidents SZC Co. would have procedures in place to ensure that contractors operate safely and are able to effect rescue from any equipment they bring on to the main development site. Equipment, resources and training would also be put in place to ensure that the site could support contractors' rescue and provide first response to any fire incidents. Further information on this may be found in the **Community Safety Management Plan** (Doc Ref 8.16) and in the **Code of Construction Practice** (Doc Ref 8.11).

9.7.234 Through engagement with Suffolk Fire and Rescue Service, and their response to public consultation (see **Consultation Report** (Doc Ref. 5.1), concern has also been raised related to the potential effects on fire service ability to respond to incidents in local communities as a result of traffic delays and loss of on-call firefighters into the Sizewell C on-site fire and rescue team.

9.7.235 As set out above under 'Crime, Anti-social Behaviour and Policing', the **Transport Assessment** (Doc Ref. 8.5) summarises the potential effects on the road network that may influence response times, and where potentially adverse, identifies mitigation to address this through the **CTMP** (Doc Ref 8.7) and the **TIMP** (Doc Ref 8.6).

9.7.236 Experience at Hinkley Point C has shown that on-call firefighters may indeed seek work on the Sizewell C Project but that it is possible for people to secure work on the on-site fire and rescue team and maintain their roles as on-call firefighters in the community. Indeed, this may be an advantage as rather than holding day jobs in non-related areas such as supermarkets, working for the on-site fire and rescue team is improving their training, skills and experience which should also benefit the community.

9.7.237 Funding for fire services comes from two principal sources: a central government grant, and a levy on the council tax collected locally. In relation to any increase in services required as a result of NHB workers, those workers in owner-occupied and private rented accommodation would be contributing to the cost of fire services. For workers living in project accommodation, SZC Co. would operate in line with statutory fire safety requirements.

9.7.238 Any additional impacts on services (apart from any possible large scale incidents which are dealt with in **section 9.8** of this chapter) are likely to be small and relate either to residents in latent and tourist accommodation and the Suffolk Fire and Rescue Service role in dealing with road traffic accidents. Overall, effects of the Sizewell C Project on fire and rescue services are likely to be minor adverse, and **not significant** at the local level and negligible and **not significant** at the county level before mitigation.

9.7.239 However, it is noted that this may increase pressure on local services and the types of activities required disproportionately, as a result of the relative remoteness of the site and its access requirements for a nuclear construction site, as well as a potential rise in demand for home safety checks. As such, under certain conditions a minor adverse effect may arise before mitigation, and therefore SZC Co. will seek to develop a responsive mitigation strategy and relevant financial contributions in this regard, as discussed in **section 9.8** of this chapter.

viii. Health and ambulance services

9.7.240 Effects on residual demand for health services and ambulance services are considered in **Chapter 28** of **Volume 2** of the **ES**, Health and Wellbeing.

ix. Community cohesion and integration

9.7.241 SZC Co. recognises that there may be challenges in integrating a workforce with specific characteristics and needs into an existing community, and aims to work with local stakeholders and service providers, and contractors to ensure that the workforce can as closely as possible integrate with the existing community, and vice-versa.

9.7.242 The Government's Integrated Communities Strategy Green Paper (Ref 9.6) sets out definitions of community integration and potential reasons for division. It identifies that integration is not assimilation, and that:

> *"communities where people live work learn and socialise together, based on shared rights, responsibilities and opportunities – underpinned by a shared set of British values – tolerance, freedom and equality of opportunity – which have helped make Britain one of the most successful multi-faith, multi-ethnic societies in the world"* (Ref 9.6).

9.7.243 The Green Paper sets out the key target areas that should be investigated by local government, business, voluntary and community sectors to ensure integrated communities – many of which would form a fundamental part of SZC Co.'s primary and tertiary mitigation for Sizewell C as set out in **Table 9.49**.

Table 9.49: Integrated Communities Green Paper 'integration initiatives' and SZC Co.'s proposed actions to mitigate/avoid potential significant adverse effects at Sizewell C

Green Paper Integration Initiatives	SZC Co. Initiative for Sizewell C
Support for Migrants	
• Review of impact of English language requirements on visas, and future	SZC Co. recognises that some NHB construction workers would require information about the area

Green Paper Integration Initiatives	SZC Co. Initiative for Sizewell C
requirements. • Review of Life in the UK Test. • Potential provision of information on life in the UK for prospective migrants. • Provision of information for recent migrants to support integration.	and local cultures and services/facilities, and help to access public services (e.g. through translation) and community facilities. Welcome packs and information would be provided on induction to the Sizewell C Project, and SZC Co. would work to ensure the workforce understand the local environment e.g. the location and population of communities, and how and where to access community facilities and public services. This would be via regular engagement with contractors and workers through channels including the accommodation management system and occupational health services, and via re-induction and information updates for workers and contractors.
Support for Young People	
• Help ensure school intake is representative of the wider area and promote mixing arrangements between schools in areas of high segregation. • Promote British values across the curriculum. • High standard of safeguarding. • Promote meaningful social mixing.	SZC Co. have identified the potential for uptake of school places by workers' children, and set out that potential effects are likely to be not significant. SZC Co. would require contractors to support and promote a Worker Code of Conduct.
English Language	
• Potential new strategy for English Language in England/new community-based English language programme/improved provision of English language learning (integration areas)/new network of community-based conversation clubs.	The UK construction workforce has a high level of English language proficiency. However, as a contingency measure, SZC Co. would work with Tier 1 contractors to ensure translation services are available.
Economic Opportunity	
• Additional funding for Jobcentre Plus to support people from most segregated communities. • Support economically inactive people through pathways to work. • Support people from ethnic minorities into work in places where there is a gap in employment rates. • Increase take up of apprenticeships by people in isolated communities.	SZC Co.'s plans to enhance local employment, skills and education benefits include: • Development of a series of outreach initiatives to maximise opportunities for people to gain employment during the Sizewell C Project. • Partnerships with local organisations to deliver an employment brokerage, to place people into sustainable employment. • Measures to identify and address barriers to work for target groups including the unemployed and young people NEETs.
Challenge Practices That Can Hinder Integration and Equal Rights	
• Empower marginalised women/understand ways overseas influences can undermine attitudes to rights and freedoms in the	SZC Co. has a commitment to enhance the diversity of the construction workforce, for example by raising the profile of women in

Green Paper Integration Initiatives	SZC Co. Initiative for Sizewell C
UK/support faith communities and interfaith dialogue/support delivery of the Hate Crime Action Plan.	construction. SZC Co. would enforce a Worker Code of Conduct that would not tolerate hate crime or discrimination and would work with Suffolk Constabulary to address any potential significant effects. SZC Co. has prepared an **Equality Statement** (Doc Ref. 5.14) to accompany the DCO application.
Shared Space and Facilities	
• Support for shared community activities through culture and sport – including working with Sport England to use sport to bring people together. • Support for shared community spaces – including community hubs and libraries, and parks which help to create a sense of place and foster local residents' pride.	SZC Co. has listened to feedback from public consultation and will deliver as part of the Sizewell C Project: • A visitor information centre that can be accessed by the community and community organisations, including schools. • Shared sports facilities to enhance community provision, left as a legacy.

9.7.244 SZC Co. recognises that the Sizewell C Project would lead to changes in population and demographics within local communities during the construction phase.

9.7.245 This assessment considers how measures have been designed to manage the Sizewell C Project's construction workers, their use of and access to public services, accommodation and community facilities, and how measures have been designed to promote integration, manage community safety and perceptions of safety to reduce potential effects on community cohesion to minor adverse (**not significant**).

9.7.246 The success of these initiatives would be reported through workforce monitoring to track the location, accommodation sectors and overall number of construction workers on the Sizewell C Project, as well as through continual feedback from the community via community liaison services, as discussed in the **CoCP** (Doc Ref. 8.11).

c) Operation

i. Employment

Operational workforce

9.7.247 The operational workforce would start to build up gradually from around year five of the construction phase. At full operation, up to twelve years after the start of construction, when all construction activity has been completed, there would be around 900 workers at Sizewell C, of which 700

are expected to be permanent staff and 200 contractors. Contractor support would increase by approximately 1,000 workers during each unit's refuelling/maintenance outages (every 18 months).

Local recruitment

9.7.248 Based on 2011 Census travel to work data, around 61% of the workforce in the workplace zone in which Sizewell B is located live in the former SCDC, and around 23% live in the former WDC – the remaining 16% live in Ipswich (5%), Great Yarmouth (2%), Mid Suffolk (2%), South Norfolk (2%) or further afield.

9.7.249 It is anticipated that the operational workforce at Sizewell C would follow a similar pattern.

9.7.250 Information from Sizewell A and Sizewell B suggests a low local recruitment ratio, usually from 5% to 15%, for the managerial and technical category, but much higher ratios for administrative and clerical (55 to 85%) and the largest category, industrial staff (50 to 70%).

9.7.251 **Table 9.50** shows the recruitment assumptions for the directly employed operational workforce. The predictions in this table suggest relatively high local recruitment figures, taking into account:

- the likelihood of some transfers from Sizewell B; and
- aspirations from SZC Co. and the local authorities to strongly encourage local recruitment through a number of channels set out in the **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9).

Table 9.50: Estimated local recruitment of operational workforce

Occupation Type	Total	Local		Non-Local	
		%	Estimate	%	Estimate
Management, Professional and Technical	180	15%	30	85%	150
Administrative and Clerical	60	70%	40	30%	20
Process, Elementary and Trades	460	65%	300	35%	160
Total	**700**		**370**		**330**

9.7.252 This suggests that around half of the permanent operational staff would be home-based i.e. drawn from a pre-existing residential population in the area. The remaining workforce would be non-home-based – though are

anticipated to move permanently to the area (as jobs are permanent) and would therefore become local residents.

9.7.253 In addition, it is estimated that there would be up to 200 contract workers working on the operational station at any one time; these are more likely to be from outside the local area, and many may be NHB.

9.7.254 This workforce is included in the overall Workforce Profile described in **Appendix 9A** of this volume, and begins to build up from year five of the Sizewell C Project. The precise levels of local recruitment at any one point are likely to vary depending on a variety of factors including the operational requirements at the time and SZC Co.'s overall workforce management strategy in relation to its nuclear fleet. There is likely to be some fluidity between the different station workforces.

9.7.255 When operational, Sizewell C would cause an increase of 36% in jobs within energy generation sector in Suffolk (based on 2018 ONS BRES data which shows there are currently 2,500 jobs in SIC 351: Electric Power Generation, Transmission and Distribution). This would represent a beneficial effect in terms of the policy aspirations of the local authorities, LEP and the sub-regional economy. This would be a moderate beneficial effect at the local level which would be **significant**.

Outages

9.7.256 During the operational phase, there would be a number of planned outages, which would require a short-term, temporary additional workforce at the Sizewell C site at regular intervals.

9.7.257 The outages would occur every 18 months or so per unit, and on average last up to two months.

9.7.258 A short-term, temporary workforce of approximately 1,000 would be required in addition to the 900 operational staff per outage. It is estimated that the majority of the annual temporary outage workforce would be recruited from outside the local area (around 85%), and that there would be some continuity of employment between the current (Sizewell B) and future (Sizewell C) outage teams – thereby minimising any additional new employment, but increasing the frequency for current contractors.

9.7.259 Sizewell B is due to be decommissioned in 2035[10], however may be subject to a lifetime extension, in which case there may be a period where outages would be required for both stations.

[10] https://www.edfenergy.com/energy/power-stations/sizewell-b

9.7.260 It is therefore anticipated that around 850 outage workers would be non-local and require accommodation in the area. There is likely to be an impact on local accommodation, including tourist accommodation. A small proportion would take up spare rooms in houses (latent accommodation) based on previous experience, and – at Sizewell B - this is usually facilitated by people advertising in local shops, at the power station itself, and in newspapers.

9.7.261 Survey information from a recent (2016) outage at Sizewell B (Ref 9.49) identified that:

- Around 85% of workers were staying in temporary accommodation, of which:
  - 22% had a private rented tenancy (though these may be more likely to be short-term agreements for use of spare rooms, rather than an assured shorthold tenancy);
  - 15% were renting spare rooms; and
  - 63% were in tourist accommodation (split evenly between self-catering and serviced accommodation).
- Around 59% shared accommodation.

ii. Wider economic effects

9.7.262 It is anticipated that Sizewell C power station operational employment would be attractive to the local workforce as a result of the traditionally high level of wages in energy generation. Stakeholders are keen to develop the external image of Suffolk as an advanced economy meeting the wider economic aspirations of the Energy Coast initiatives within NALEP, to diversify the economic base, address pockets of deprivation, improve the skills base in the long-term (especially in engineering and construction) and attract and retain more workers (especially younger workers, and those who have left Suffolk to go to university elsewhere who may not otherwise return to the area).

9.7.263 The operational Sizewell C power station would provide a long-term continuation of a substantial quota of skilled and secure jobs for local people with a major energy sector employer.

9.7.264 At full operation, the indirect employment effects and the increase in the level of income in the local economy would be of a more permanent nature.

9.7.265 Indirect economic benefits would be generated through:

- earnings of operational staff; and
- local contracts placed during operation.

Local indirect employment

9.7.266 The average earnings of Sizewell C power station employees (both construction and operational) would be substantially above the average for the area and would give a major boost to local average earnings, and to local services.

9.7.267 Figures for earnings generated by the Sizewell C power station may be of the order of £44.5 million per annum. Previous studies suggest additional local indirect employment of about 60% of direct employment, which would be in the order of approximately 360 jobs for the proposed operational Sizewell C station.

9.7.268 The approximately 1,000 outage workers would also be likely to have multiplier expenditure and employment impacts, proportionately more akin to those for un-accompanied NHB construction workers.

9.7.269 The combined indirect economic effect of earnings and expenditure by operational staff and outage workers is anticipated to be a moderate beneficial effect which would be **significant**.

Business and supply chain

9.7.270 The Sizewell C Project would provide opportunities for business growth, both directly associated with contracts, and also indirectly in supporting sectors.

9.7.271 Overall the development is likely to contribute to longer term economic stability in the area. It should also provide opportunities for the development of local firms with both nuclear construction and operational phase supply chain links, which would help to raise the skill level and presence of energy sector activity in the area.

9.7.272 Overall this should lead to growth in a key sector that is complementary to more traditional sectors (e.g. manufacturing) in the region, offering high quality employment and opportunities for local businesses through an intensive construction period and a prospective operating lifetime of around sixty years.

9.7.273 The indirect economic effect of supply chain and procurement of goods and services for the operational power station is anticipated to be a moderate beneficial effect which would be **significant**.

iii. Accommodation

9.7.274 It is SZC Co.'s existing policy that all operational permanent staff should live within 25 miles of the station. As set out above, information from the 2011 Census shows that around 61% of the workforce in the workplace zone in which Sizewell B is located live in the former SCDC, and around 23% live in the former Waveney District – the remaining 16% live in Ipswich (5%), Great Yarmouth (2%), Mid Suffolk (2%), South Norfolk (2%) or further afield.

9.7.275 It is similarly envisaged that the non-local outage workforce would be accommodated in the same area for the duration of their activities.

9.7.276 In terms of accommodation sectors, studies at a number of power stations show that permanent employees in the electrical supply industry have higher rates of owner-occupation than the national average. Ownership rates are particularly high for staff employees. In the absence of any public sector provision, it is anticipated that most of those not buying would rent in the private sector. As such, the approximate tenure mix at full operation is estimated to be around 80% owner occupation, and around 20% private rented.

9.7.277 The anticipated demand in total for owner-occupied sector and PRS accommodation is low in comparison with the construction phase, and as the demand is likely to be spread over a number of years, coinciding with the rundown of construction (and the release of some accommodation previously used by construction workers), it is not expected that there would be any adverse effects in meeting the accommodation demands associated with the operational phase.

9.7.278 **Table 9.51** provides an estimate of the geographical distribution of operational staff accommodation, based on the premise that the pattern would be similar to that for the current operational Sizewell B.

Table 9.51: Estimated geographical distribution of the operational workforce, by accommodation type – at full operation

Geography	Owner-occupied		Rented		Total	
	%	Number	%	Number	%	Number
Local Authority District						
East Suffolk	68%	609	17%	152	85%	761
Suffolk Coastal	49%	441	12%	110	61%	552
Waveney	19%	168	5%	42	23%	210
Ipswich	4%	34	1%	8	5%	42
Great Yarmouth	2%	16	0%	4	2%	20

Geography	Owner-occupied		Rented		Total	
	%	Number	%	Number	%	Number
Mid Suffolk	2%	16	0%	4	2%	20
South Norfolk	2%	14	0%	4	2%	18
Broadland	1%	6	0%	1	1%	7
Elsewhere	3%	29	1%	7	4%	36
Total	**80%**	**720**	**20%**	**180**		**900**

9.7.279 Based on existing supply and frictional capacity set out in **Appendix 9D** of this volume, there would be a negligible effect on local accommodation demand which would be **not significant**.

iv. Public Services

9.7.280 The operational workforce would have become established over the time of the construction period and become part of the permanent population of the area. Any impacts on education and public services would therefore have already been mitigated during the construction phase. As occupants of PRS or owner-occupied sector accommodation, the workforce would be council taxpayers and entitled to public services in common with other residents.

9.7.281 As such, the impact of the net additional operational workforce on demand for public services is considered to be negligible and **not significant.**

v. Community cohesion and integration

9.7.282 SZC Co. recognises that there may be challenges in integrating a workforce with specific characteristics and needs into an existing community and would work with stakeholders, service providers and contractors, to ensure that the workforce can as closely as possible integrate with the existing community, and vice-versa.

9.7.283 The build-up in operational workforce would commence in year five and peak at year 12, with a relatively shallow build up over time that would be well within average annual turnover. Some residents would be recruited locally, of which some may transfer from Sizewell B, and some would be new to the area.

9.7.284 Given the scale of change, the potential effects on community cohesion and integration are assessed as negligible and **not significant.**

d) Inter-relationship effects

i. Construction

9.7.285 Where relevant, the socio-economic assessment inherently includes inter-relationship effects on receptors related to other environmental aspects – for example, effects on emergency service provision refers to the socio-economic effects of the workforce, along with changes to response times reported in the **Transport Assessment** (Doc Ref 8.5).

9.7.286 As such, where relevant, primary and tertiary mitigation developed for the socio-economic assessment includes measures that cross-cut environmental aspects as described in **section 9.6** of this chapter, for example primary and tertiary measures set out in the **Community Safety Management Plan** (Doc Ref 8.16), the **Code of Construction Practice** (Doc Ref. 8.11) and the **Traffic Incident Management Plan** (Doc Ref. 8.6), **Construction Traffic Management Plan** (Doc Ref. 8.7), and the **Construction Worker Travel Plan** (Doc Ref. 8.8).

9.7.287 The **Community Impact Report** (Doc Ref 5.13) sets out where receptors will experience one or more significant effects across different environmental topics on a local community basis, and signposts to the full assessment (and subsequent development of mitigation).

ii. Operation

9.7.288 No further inter-relationship effects have been identified.

9.8 Mitigation and monitoring

a) Introduction

9.8.1 Where possible, mitigation measures have been proposed where a significant effect is predicted to occur. Primary and tertiary mitigation measures which have already been incorporated within the design of the proposed development are detailed in **section 9.6** of this chapter.

9.8.2 This section describes the proposed secondary mitigation measures for the socio-economic assessment within, and in the vicinity of, the proposed development. Where other mitigation is required to reduce or eliminate a significant effect, this is referred to as secondary mitigation. Secondary mitigation measures have not been incorporated into the design of the proposed development and would therefore not appear on any development plans.

9.8.3 This section also describes any required monitoring regimes, including monitoring of specific receptors/resources, or monitoring the effectiveness

of a mitigation measure. The requirements, scope, frequency and duration of a given monitoring regime are also set out, as far as possible.

b) Mitigation (and enhancement)

9.8.4 For the purpose of this assessment, mitigation measures have been proposed where there is an adverse impact of greater than minor significance and the impact magnitude, spatial scope, and temporal nature make it appropriate to do so.

9.8.5 Across the socio-economic assessment, SZC Co. has adopted a best practice precautionary approach to ensure that all evidenced impacts described in this assessment would be addressed through mitigation where practicable and that a monitoring system would be in place to address the sensitivities described in the impact assessments. The relevant strategies for mitigation and monitoring are listed and cross referenced below along with their key points. Where possible, enhancements have been identified which could bring additional benefits to the area.

9.8.6 Relevant mitigation and enhancement measures are listed and cross referenced below. These mitigation and enhancement measures would be implemented during the construction phase of the Sizewell C Project.

i. Employment, skills and education effects

9.8.7 The economic effects of the Sizewell C Project on skills, employment, and labour market and supply chain are substantial and beneficial in terms of the creation of new jobs, effects on unemployment and economic inactivity, generation of business activity in the supply chain, and indirect and induced benefits of earnings and spending of workers.

9.8.8 SZC Co. has set out the overall economic benefits of the Sizewell C Project in the **Economic Statement** (Doc Ref. 8.9), which includes measures to enhance the benefits of the Project, which are embedded into the assessment of significance (see **Section 9.6**).

9.8.9 As the proposed development results in beneficial effects on skills, employment, labour market, and supply chain, these effects do not require additional mitigation.

ii. Tourism

Tourism Fund

9.8.10 SZC Co. recognises that there may be potential for the tourist economy to be adversely affected as a result of the Sizewell C Project, in some locations and under some conditions.

9.8.11 SZC Co. recognises that there is inherent uncertainty in whether and where such adverse effects may occur. SZC Co. also recognises that there is an opportunity to tackle perceived changes to certain sensitivities that existing and potential visitors to the area may be concerned about, and to ensure that the residual effect of the Sizewell C Project on tourism is not negative, and is potentially positive.

9.8.12 As such, SZC Co. will make available a Tourism Fund to develop mitigation measures to reduce this risk and promote the area in order to reduce the risk of perceived changes in visitor behaviour from materialising. This Tourism Fund, along with its the governance, scale, and application, will be secured by the Section 106 Agreement (see **draft Section 106 Heads of Terms**). This Tourism Fund could be used to deliver initiatives such as:

- Development of or support for a tourism strategy/action plan.
- Marketing and promotion activities for the Suffolk coast and specific attractions and events within it, which can demonstrate a strong return on investment.
- Supporting local projects including capital and revenue investment.
- Undertaking future visitor surveys.
- Providing information about public transport and travel.
- Supporting existing tourist information centres.
- Responding to effects on particularly sensitive attractions/locations within the AONB.

iii. Agricultural economy

9.8.13 On completion of the construction phase, the land outside of the permanent development site would be restored to agricultural use and ecological habitat creation.

9.8.14 As the proposed development results in negligible effects on the local agricultural economy, these effects do not require additional mitigation.

iv. Accommodation

9.8.15 Although the construction phase assessments predict a negligible or minor adverse effect on the accommodation market at the wider scale, there are

predicted to be localised effects, which would be of major adverse significance and therefore require additional mitigation.

9.8.16 As such, mitigation has been proposed as part of an **Accommodation Strategy** (Doc Ref. 8.10) submitted with the application and summarised below.

9.8.17 The **Accommodation Strategy** (Doc Ref. 8.10) contains measures to specifically target hard to reach and vulnerable groups that may experience difficulties accessing or retaining housing as a result of the Sizewell C Project's effects on the lower end of the PRS – see **Accommodation Strategy** (Doc Ref. 8.10), and Housing Fund (secured through the Section 106 Agreement).

Housing Fund

9.8.18 SZC Co. is proposing additional support for housing in the local area by establishing a Housing Fund, linked to the **Accommodation Strategy** (Doc Ref 8.10).The Housing Fund would be informed by the scale of the workforce, likely accommodation sector demand, and existing supply and characteristics of the local housing market.

9.8.19 This support will particularly focus on the PRS, and the lower end of that sector where there is the greatest potential for workers to seek the same type of accommodation that local residents with housing need rely on.

9.8.20 The Housing Fund would be capable of delivering additional capacity and providing resilience in the build up to peak demand and during the peak, and may have the potential to leave a lasting legacy in terms of improvements to the existing housing stock.

9.8.21 The Housing Fund would provide financial support to a range of initiatives which would help to:

- Develop supply through a range of measures including:
  - supporting rent/deposit guarantee schemes – interventions to make the market work better, and support rent deposits for people at risk of homelessness;
  - providing equity loans to residents to enable them to secure suitable accommodation and free up homes/rooms in the PRS;
  - providing equity loans to residents in the social rented sector to help them access owner-occupied and rented property and rationalise the supply and occupancy of social rented homes as a result;

  - supporting empty homes back into use;
  - providing loans/grants/guaranteed lets, e.g. renovation grants;
  - helping to deliver the East Suffolk Housing Strategy (2017) (Ref 9.17) pledge to work with housing associations to explore opportunities for mixed schemes of private sale and affordable housing to generate profits to replace grant funding; and
  - tackling under-occupation.

- Provide funding for resilience – to support and provide resilience to services, staffing, advice and short-term response such as temporary accommodation and the use of bed and breakfast accommodation.

- Support growth in the tourist accommodation sector through support with planning, licensing and development, and funding for increases in capacity or re-design of sites.

9.8.22 This Housing Fund, along with its the governance, scale, and application, will be secured by the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

Accommodation management system

9.8.23 In order to help manage the distribution of workers and avoid or reduce potential adverse effects on accommodation capacity in local areas in a responsive way, SZC Co. would work with partners to develop mechanisms that:

- allow local landlords, tourism businesses and residents to register accommodation available for workers; and

- enable SZC Co. and its contractors to signpost workers towards this accommodation and provide information to accommodation providers.

9.8.24 The implementation of the accommodation management system will be secured through the Section 106 Agreement (see **draft Section 106 Heads of Terms**) and will include the following components:

- Monitoring of the workforce (see part (c) of this section), contractors and local housing market (see information management and database/portal below).

- Provision of information to workers, contractors and accommodation providers, and working with providers to help them understand opportunities to support the Sizewell C Project's workforce.

Information management and database/portal

9.8.25 SZC Co. would collect, manage, and hold information about the local accommodation market (including registrations from providers with accommodation) that can be used to provide contractors and workers with a means of finding the most suitable accommodation and location.

9.8.26 In addition, information would be provided to prospective or existing landlords that could help ensure they are providing accommodation that meets safety and quality standards. This would help to avoid the risk of landlords being unaware of rules and regulations that apply to letting property, or new providers entering the market with accommodation of an unacceptably low standard.

9.8.27 The Accommodation Management System would serve to raise understanding of applicable regulations, and sources of further information for prospective accommodation providers.

9.8.28 SZC Co. will run a series of 'one-stop-shop' open events for providers of tourist accommodation and particularly caravan sites close to the Sizewell C Project, along with ESC, in order to:

- Inform them of the likely scale of demand from workers, how this changes over time, and the likely accommodation requirements and characteristics of the workforce.
- Set out expected safety and quality standards, as well as planning and licensing that may be required to provide accommodation to workers, for example amendments of residency criteria for caravan sites.
- Respond to any concerns that accommodation providers may have about NHB construction workers, including how the Sizewell C Project uses the Worker Code of Conduct to enforce high standards of behaviour both on and off-site.
- Explain what providers can/cannot expect from the Sizewell C Project based on lessons learnt from Hinkley Point C, e.g. the Sizewell C Project will not reimburse unpaid rent and – due to the large number of people on-site – can only enforce the Worker Code of Conduct if accommodation providers collect a full name/contractor name from tenants.

9.8.29 Through a 'look-ahead' with contractors and SZC Co.'s workforce delivery team, spikes in worker demand may be mitigated through a proactive approach to identifying suitable accommodation.

9.8.30 The Sizewell C Project would also be able to provide information about the key activities of the construction phase, facilities and build-up of the workforce back to the market, which would help providers understand more about the likely demand and plan for it. This may include location of project infrastructure such as park and ride sites, and pick-up points for buses for example.

9.8.31 It is anticipated that the measures funded by the Housing Fund and implemented as part of the accommodation management strategy would result in residual effects reducing to **not significant** (negligible to minor adverse) at all scales.

v. Public services and community facilities

Education

9.8.32 The assessment considers that effects on physical provision of educational facilities are negligible at the 60-minute, district and county scales, although there are uncertainties around the likely location of the workforce, and available school capacity in the future which could create minor adverse effects in localised areas.

9.8.33 SZC Co. would employ workforce monitoring and surveys as part of the mitigation of effects on accommodation. This monitoring would provide information to estimate the number and locations of workers who bring dependent children to the area temporarily. SZC Co. would provide this information to SCC and, with them, identify potential effects on education capacity.

9.8.34 Periodically, if a potential effect was identified through the information, SCC would be able to draw down on a Public Services Contingency Fund to expand provision in locations with limited capacity where the net additional effect of the workforce exceeds capacity. The establishment of this Public Services Contingency Fund will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

9.8.35 Should the need arise, the public services contingency fund could also contribute to funding a support teacher or member of staff who could co-ordinate any additional activities required to integrate children into the local school system.

9.8.36 This would ensure that residual effects are negligible at all spatial levels.

Social care

9.8.37 SZC Co. is aware of the risks that the Sizewell C Project may pose to the delivery of social services. The Sizewell C Project's implementation plans, secured through obligations in the Section 106 Agreement (see **draft Section 106 Heads of Terms**), have been developed to limit potential effects on the delivery of social care.

9.8.38 **Section 9.6** sets out embedded (primary) and tertiary measures that contribute towards reducing risks associated with the provision of social care services.

9.8.39 Overall, the following additional mitigation activities would indirectly contribute to reducing the risk of adverse significant effects on social care and the beneficiaries of the service:

- Specifically targeting hard to reach and vulnerable groups that may experience difficulties accessing or retaining housing as a result of the Sizewell C Project's effects on the lower end of the PRS – see **Accommodation Strategy** and Housing Fund (Doc Ref. 8.10).

- Working bilaterally with those organisations closest to the Sizewell C Project that raise safeguarding concerns to identify practical and effective solutions, as set out in the **Community Safety Management Plan** (Doc Ref. 8.16).

- Providing community information to workers and contractors, and workforce information to communities, community groups and accommodation providers in order to promote integration and awareness of the Sizewell C Project and its effects, and the characteristics of the communities in the local area. This information would be provided through mechanisms secured in the **Accommodation Management System** which would be implemented in addition to the tertiary mitigation communication measures set out in the **CoCP** (see **Section 9.6**) (Doc Ref. 8.11).

- Managing workforce accommodation through the **Accommodation Management System.** The implementation of the Accommodation Management System would be secured through an obligation in the Section 106 Agreement (see **Section 106 Head of Terms**).

9.8.40 SZC Co. acknowledges the risks that the Sizewell C Project may pose to the delivery of social services as identified by stakeholders and has therefore proposed a Public Services Contingency Fund to be secured through the Section 106 Agreement to mitigate potential effects, and

respond to effects related to the Sizewell C Project as they arise. The establishment of this Public Services Contingency Fund will be secured through an obligation in the Section 106 Agreement (See **draft Section 106 Heads of Terms**).

9.8.41 The proposed mitigation would ensure that the residual effects of the Sizewell C Project on social services would be negligible at all scales.

Recreation, sport and leisure

9.8.42 The impact on demand for additional formal sport and leisure service provision is likely to be limited due to the demographic characteristics of the workforce, its temporary nature, its relatively short peak effects, and its propensity to use existing facilities based on demographics and market segmentation.

9.8.43 Any adverse effects would be avoided by primary mitigation, including the sports and leisure provision at Leiston set out at **Section 9.6.**

Regulatory and environmental services

9.8.44 Impacts on regulatory and environmental services are identified as negligible at the district level, with the potential to be minor adverse at the local (ward) level.

9.8.45 The proposed approach to mitigating accommodation impacts described above would mitigate the impact on the main regulatory service functions. The residual effects would therefore be negligible at the district and local levels.

Emergency services

9.8.46 SZC Co. has been working with service providers (including district and county councils, Suffolk Constabulary, Suffolk Fire and Rescue Service, and East of England Ambulance Service, as discussed in **Volume 2, Chapter 28** of the **ES**, Health and Wellbeing) to address any potential community safety impacts arising from the Sizewell C Project.

9.8.47 Effects identified range from negligible or minor adverse at regional scales to moderate adverse at some more local scales across emergency response for fire and rescue, policing and ambulance services.

9.8.48 The assessment sets out that while wider effects may be not significant, engagement with service providers has identified that there may be local factors and service-specific factors that contribute to disproportionate demand which will need to be mitigated through financial contributions secured by the Section 106 Agreement.

9.8.49 Additionally, SZC Co. recognises that in some cases, incidents that may arise may draw on more than one emergency service resource, and that some incidents may be more likely to occur than others due to the demographic factors of the workforce. The implication of these incidents have been considered in the **Community Safety Management Plan** (Doc Ref 8.16), and SZC Co. is working with Suffolk Constabulary to consider all aspects of potential additional demand for resources in order to develop appropriate mitigation via financial contributions secured by the Section 106 Agreement.

Policing services and community safety

9.8.50 The assessment considers that while potential effects on crime levels would be negligible at the Suffolk Constabulary service level, there may be some moderate adverse effects in local wards as a result of the concentration of NHB workers in some areas.

9.8.51 A **Community Safety Management Plan** (Doc Ref. 8.16) has been produced which sets out the overarching approach to ensuring that community safety and emergency services issues are comprehensively addressed, and governance and monitoring arrangements are in place to deal with any particular sensitivities should they arise. This should enable the service providers responsible for community safety to continue to provide existing services without disadvantage to the community caused by the Sizewell C Project.

9.8.52 Where necessary, SZC Co. will address effects on the provision of emergency services through financial contributions towards additional resourcing relevant to the identified net additional level of effect, secured through the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

9.8.53 As a result of the proposed additional mitigation, the residual effects of the Sizewell C Project on policing services and community safety would be negligible at the Suffolk Constabulary scale, and at local (ward) scales.

Fire and rescue services

9.8.54 Impacts on fire and rescue services are likely to be negligible at the Suffolk Fire and Rescue Service level, but there is a risk they could be minor adverse at the local level subject to the types of incidents.

9.8.55 Mitigation is set out in the **Community Safety Management Plan** (Doc Ref. 8.16), and the **Accommodation Strategy** (Doc Ref. 8.10).

9.8.56 Where necessary, SZC Co. will address effects on the provision of emergency services through financial contributions towards additional

resourcing relevant to the identified net additional level of effect, secured through the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

9.8.57 As a result of the proposed additional mitigation, the residual effects of the Sizewell C Project on fire and rescue services and community safety would be negligible at the Suffolk Fire and Rescue Service scale, and at local (ward) scales.

vi. Community cohesion and integration

9.8.58 The Sizewell C Project is likely to lead to significant effects on population and demographics on a temporary basis in Leiston. Perceived changes to community cohesion and integration may arise during this time and SZC Co. has set out measures by which this will be managed.

9.8.59 This would partly be addressed through the mitigation measures for economy and skills, accommodation and public services described elsewhere in this section but SZC Co. also proposes a number of actions to avoid/limit any negative impacts and to mitigate impacts locally.

9.8.60 SZC Co. would work with public service providers and individual facilities (such as schools) to provide them with up-to-date information about the construction workforce, as discussed in section 9.8(i) of this chapter, and management plans to ensure services are aware of potential demand in advance.

9.8.61 SZC Co. are aware of potential effects of the construction workforce on vulnerability to homelessness – proposed mitigation measures are set out in this chapter and in the **Accommodation Strategy** (Doc Ref. 8.9) including measures to ensure that workers are able to access secure and adequate quality accommodation.

Community Safety Management Plan

9.8.62 SZC Co. has developed a **Community Safety Management Plan** (Doc Ref. 8.16) in collaboration with local authorities, emergency services and public services, among other stakeholder groups. It outlines the approach to community safety in the area. It also sets out a range of measures that will contribute to both worker and community safety and health and wellbeing on the Sizewell C Project. Where appropriate, implementation of the measures set out in the **Community Safety Management Plan** will be secured through obligations in the Section 106 Agreement (see **draft Section 106 Heads of Terms**, provided as **Appendix J** to the **Planning Statement** (Doc Ref. 8.4)) or via the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11) (which will itself be secured by requirement).

Additional mitigation measures set out in the **Community Safety Management Plan** include:

- a precautionary approach to manage impacts on community safety, cohesion and public services, with a focus on prevention where possible and measures to raise awareness of the Sizewell C Project's changes/risks to community safety;

- information for accommodation providers in the PRS and tourism sectors, setting out details of the workforce profile and the Worker Code of Conduct (see the **Accommodation Management System** and approach to mitigating accommodation impacts described above);

9.8.63 These would be in addition to the relevant primary and tertiary mitigation set out in **section 9.6** which include:

- a mechanism for the local community to register public concerns, through (for example) a hotline (secured through the **CoCP** (Doc Ref. 8.11));

- provision of occupational health services to reduce pressure on existing facilities and a review of any residual public health care requirements from NHB workers and their families; and

- provision of project-recreational facilities, including off-site sports facilities, helping to manage the demand from workers.

Property (accommodation campus and caravan site)

9.8.64 SZC Co. would ensure the active management of its on-site accommodation. This would include enforcement of expected standards of behaviour from workers, hours of operation, security issues, liaison with emergency services and complaints procedures for local residents. These measures would be included in the **Worker Code of Conduct** (see **Section 9.6**).

Community Fund

9.8.65 SZC Co. recognises that there would be intangible residual in-combination effects on local communities as a result of combined environmental effects, both perceived and real. In some instances, these cannot be directly mitigated through physical design measures, and require a more reactive approach.

9.8.66 As a result, SZC Co. would offer a Community Fund to be administered on behalf of the community to help mitigate these effects through schemes, measures and projects which promote the economic, social or environmental well-being of those communities and enhance their quality of life. The provision of the Community Fund will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

9.8.67 The Community Fund may include:

- an ongoing programme of small grants to charities, voluntary groups and social enterprises – awarded for projects, measures or initiatives that help to mitigate impacts felt in the community from the construction of the Sizewell C Project; and
- strategic grants – for example for investment in local facilities or services to enhance the positive and reduce or avoid potential negative impacts on communities.

9.8.68 In general, activities receiving grants should aim to improve the social, economic or environmental wellbeing of the communities affected by the development and be relevant to the Sizewell C Project's effects, either by reducing or removing impacts or by helping the community to take advantage of opportunities presented by the Sizewell C Project.

9.8.69 The Community Fund will recognise that some communities closer to the main development site are likely to experience more and greater effects across a wider range of social, economic and environmental areas.

vii. Inter-relationship effects

9.8.70 As set out above (**part vi** of this section), the Community Fund would seek to mitigate intangible residual in-combination environmental effects on local communities (socio-economic receptors) as a result of combined environmental effects, both perceived and real.

c) Monitoring

9.8.71 This chapter sets out likely significant effects based on the best current knowledge and assumptions about the scale and nature of the Sizewell C Project's construction workforce, the supply of accommodation, and the likely spatial distribution of the workforce.

9.8.72 The spatial distribution of the workforce is itself based on a Gravity Model that has been reviewed by stakeholders.

9.8.73 However, SZC Co. acknowledges that, as with any assumptions, there is some uncertainty and the reality could be different.

9.8.74 SZC Co. has therefore taken a precautionary approach to the assessment of effects and has planned its mitigation based on the peak of construction. It is applying mitigation strategies that are comprehensive in scale and implementation strategies that are flexible and responsive to local variations, related to uncertainty, where they may occur. This is an important element in the adaptive approach to mitigating effects for this major project.

9.8.75 Any differences from the assessed case may or may not lead to different impacts which may or may not require different or additional mitigation. A difference in the size or distribution of the workforce alone may not lead to different impacts. For example, the assessment of accommodation impacts is based on assumptions about the supply of accommodation. If the workforce were more spatially concentrated, and the local accommodation market responded by making more accommodation available, the actual impacts may be largely similar or identical to the assessed impacts.

9.8.76 It is therefore necessary to monitor both the inputs (i.e. the scale, nature and distribution of the workforce), and also the outputs (the effects of the workforce on accommodation markets or public services).

9.8.77 SZC Co. recognises that effects and mitigation set out in this chapter have the potential to be influenced by factors beyond SZC Co.'s control including political, legislative and policy change, economic change and local factors.

9.8.78 In order to plan for this uncertainty, and to help the local authorities manage mitigation effectively, SZC Co. and contractors will work together to develop an effective approach to monitoring of the workforce that will help to inform how mitigation can be best directed to areas, sectors and services that would address any issues as they arise.

i. Workforce monitoring and surveys

9.8.79 Information on the location and type of accommodation being used by workers will be collected throughout the construction period through regular workforce surveys. This will be benchmarked to an overall database that will record any worker who is employed on the Sizewell C Project, and who travels to site. The workforce profile includes all workers who work at the site for five days in any calendar month, or four consecutive days, and therefore captures people likely to seek temporary accommodation in the local area on a medium-to-long-term basis.

9.8.80 The monitoring and workforce survey system will be implemented based on the following principles:

- That workers will be inducted on to the Sizewell C Project and given a unique reference number and site access card that will be used to track their progress on a single database. This will inform SZC Co. of how many people are working on the Sizewell C Project, and how many people travel to site, and how regularly.

- Workers will periodically need to re-induct on the Sizewell C Project, but will retain their unique reference number.

- Regular workforce surveys will be undertaken, fixed to a statistically significant sample size, and with consistent survey questions that can provide longitudinal data.

- Workforce surveys will return information relating to:

  - Whether the workforce is HB or NHB – by asking about the permanent place of residence of if workers do not move to the area for work (i.e. HB workers), and the temporary place of residence if workers do move to the area for work (i.e. NHB workers).

  - The skill/role of the employee.

  - Demographic and housing characteristics of the worker relevant to the assessment, including their age, gender, the type of temporary accommodation they are staying in, and whether they have brought with them any dependent children or adults.

9.8.81 This data will be collected in a single database and reviewed every six months in order to track the scale and potential effects of the workforce to inform the delivery of mitigation measures as set out in this assessment.

9.8.82 SZC Co. will undertake monitoring of the workforce and will use reasonable endeavours to obtain the necessary information from workers and contractors. The implementation of this monitoring will be secured through a Section 106 Agreement (see **draft Section 106 Heads of Terms**).

ii. Monitoring of effects

9.8.83 In some instances, the monitoring of potential effects of the construction workforce is needed to identify where and which mitigation measures need to be enacted. SZC Co. will continue to agree relevant indicators of effects with local authorities responsible for services that may be affected. From time to time, East Suffolk Council and SZC Co. will propose relevant indicators to a Socio-Economic Advisory Group for its approval. The establishment of the Socio-Economic Advisory Group will be secured

through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

Accommodation effects

9.8.84 Local authorities are required to provide a substantial amount of monitoring data to central government in order to monitor the level of service demand, for example in the form returns that monitor demand for services related to housing need, and effectiveness of homelessness prevention services.

9.8.85 SZC Co. and ESC recognise the value of utilising this information as supporting evidence to demonstrate effects. Further details are set out in the **Accommodation Strategy** (Doc Ref. 8.10).

Community safety and community cohesion effects

9.8.86 SZC Co.'s communication, community and stakeholder engagement strategy sets out measures for the community to report incidents and liaise with the Sizewell C Project about concerns with regards to community safety, cohesion and integration as a result of the construction workforce. The strategy also includes measure for the provision of information and is set out in the **Code of Construction Practice** (Doc Ref. 8.11).

9.8.87 Feedback would also be gained via the Community Safety Working Group, further details of which are set out in the **Community Safety Management Plan** (Doc. Ref. 8.16). The establishment of the Community Safety Working Group, will be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms**).

9.8.88 This information would allow SZC Co. to enact the measures set out within its implementation plans, most importantly the measures set out in the **Community Safety Management Plan** (Doc Ref. 8.16), and inform public service providers with responsibilities for community safety of the location and nature of effects.

Supply chain and employment and skills effects

9.8.89 SZC Co. supply chain team will seek to collect data on businesses supplying the Sizewell C Project, most likely utilising a socio-economic reporting tool similar to the one already in use at Hinkley Point C. This will enable reporting of international, UK, and local/regional content and spend, for the purposes of reporting to government and other stakeholders as required.

9.8.90 Tier 1 and Tier 2 suppliers will be encouraged to participate in gathering information which will be used compare and contrast local and regional levels of engagement.

9.8.91 There would also be ongoing review of the effectiveness of the measures set out in the **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9) and the **Supply Chain Strategy** provided in **Appendix B** of the **Economic Statement** (Doc Ref. 8.9), including key performance indicators.

iii. Governance

9.8.92 By monitoring workforce patterns, and through ongoing stakeholder engagement, potential effects arising (on housing, public services or community safety) will be identified.

9.8.93 SZC Co. will work with local authorities and contractors to regularly review and report on monitoring and survey information collected, against the changing background of policy, economic and legislative change that may arise during the Sizewell C Project, and collaboratively decide on how best to release, distribute and track mitigation in order for it to have sufficient time to be implemented, and to make sure it is directed to the areas it is needed most.

9.8.94 This reporting would be undertaken by a socio-economic advisory group, the terms of reference of which would be secured through the Section 106 Agreement (see **draft Section 106 Heads of Terms)**.

9.9 Residual effects

9.9.1 **Table 9.52** presents a summary of the socio-economic assessment. It identifies the receptor/s likely to be impacted, the level of effect and, where the effect is deemed to be significant, the table includes the mitigation proposed and the resulting residual effect.

9.9.2 It should be noted that not all such effects would be adverse and some would be beneficial.

Table 9.52: Summary of effects for the socio-economic assessment

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
Economic Effects – Construction					
Labour market.	Home-based recruitment.	Enhancement through **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9).	Moderate Beneficial **(Significant)** at 90-minute (CDCZ) scale.	None	Moderate Beneficial **(Significant)** at CDCZ.
Labour market (workless i.e. unemployed or economically inactive).	Effects on unemployment and economic inactivity.	Enhancement through **Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9).	Moderate/Major Beneficial **(Significant)** at CDCZ scale.	None	Moderate/Major Beneficial **(Significant)** at CDCZ scale.
Labour market (Employed).	Effects on labour market churn and 'displacement'.	**Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement** (Doc Ref. 8.9).	Negligible **(Not Significant)** at CDCZ scale.	None	Negligible **(Not Significant)** at CDCZ scale.
Local/regional	Business and supply chain.	**Supply Chain**	Moderate Beneficial **(Significant)**	None	Moderate Beneficial

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
economy.		**Strategy** provided as Appendix B of the **Economic Statement** (Doc Ref. 8.9).	at local and regional scale.		**(Significant)** at local and regional scale.
Local/regional economy.	Wages/spending and additionality.	None	Moderate Beneficial **(Significant)** at local and regional scale.	None	Moderate Beneficial **(Significant)** at local and regional scale.
Local/regional economy.	Effects on tourism economy.	None	Potential for Minor to Moderate Adverse **(Potentially Significant)** effect at the local (Suffolk coast) scale[11].	Tourism Fund.	Negligible **(Not Significant)** at the local (Suffolk coast) scale
Local/regional economy.	Effects on agricultural economy.	None	Negligible **(Not Significant)** at Suffolk (county) scale.	None	Negligible **(Not Significant)** at Suffolk (county) scale.
Local/regional economy.	Effects of transport on business.	None	Negligible **(Not Significant)** at Suffolk (county) scale.	None	Negligible **(Not Significant)** at Suffolk (county) scale.
Accommodation Effects - Construction					
Tourist accommodation sector.	Effects on capacity and operation of the tourist accommodation sector.	Accommodation Campus and Caravan Site.	Minor Beneficial **(Significant)** at 60-minute area scale. Minor to Major Adverse **(Significant)** at local scale (wards).	Housing Fund. Accommodation Management System.	Minor Beneficial **(Not Significant)** at 60-minute area scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).
Private rented	Effects on capacity and	Accommodation	Negligible **(Not Significant)** at 60-	Housing Fund.	Negligible **(Not Significant)** at

[11] SZC Co. recognises that there is inherent uncertainty about the extent to which this may occur, and there is an opportunity to tackle perceived changes to certain sensitivities that existing and potential visitors to the area may be concerned about

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
accommodation sector.	operation of the private rented accommodation sector.	Campus and Caravan Site.	minute area scale. Minor to Major Adverse **(Significant)** at local scale (wards).	Accommodation Management System.	60-minute area scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).
Owner occupied accommodation sector.	Effects on capacity and operation of the owner-occupied accommodation sector.	Accommodation Campus and Caravan Site.	Negligible **(Not Significant)** at 60-minute area scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).	None	Negligible **(Not Significant)** at 60-minute area scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).
Population Dynamics – Construction					
Population	Population change and dynamics.	None	Negligible or Minor **(Not Significant)** at 60-minute area scale. Moderate to Major **(Significant)** at local scale (wards).	None	Negligible or Minor **(Not Significant)** at 60-minute area scale. Moderate to Major **(Significant)** at local scale (wards).
Public Services Effects – Construction					
Pre-school provision and childcare services.	Effects on demand for childcare against existing capacity.	None	Negligible **(Not Significant)** at District and County scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at District and County scale. Negligible **(Not Significant)** at local scale (wards).
Primary school capacity.	Effects on demand for primary education against existing capacity.	None	Negligible **(Not Significant)** at 60-minute area, District and County scale. Negligible to Minor/Moderate Adverse **(Not Significant)** at local scale (wards).	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at 60-minute area, District and County scale. Negligible **(Not Significant)** at local scale (wards).

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
Secondary school capacity.	Effects on demand for secondary education against existing capacity.	None	Negligible **(Not Significant)** at 60-minute area, District and County scale. Negligible to Minor Adverse **(Not Significant)** at local scale (wards).	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at 60-minute area, District and County scale. Negligible **(Not Significant)** at local scale (wards).
Social Services provision / capacity.	Effect on provision of social services (Demand from workers' families).	None	Negligible **(Not Significant)** at 60-minute area and County scale.	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at 60-minute area and County scale.
Social Services provision / capacity.	Effect on provision of social services (Construction workforce).	**Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement**. Occupational Healthcare Service.	Negligible **(Not Significant)** at County scale. Minor Adverse **(Not Significant)** at local scale (wards).	Welcome Packs. Housing Fund. Community Fund. Additional measures set out in the Community Safety Management Plan Public services contingency fund.	Negligible **(Not Significant)** at County scale. Minor Adverse **(Not Significant)** at local scale (wards).
County Council-run services.	Effects on demand for / capacity of other county-level services.	None	Negligible **(Not Significant)** at County scale.	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at County scale.
Provision and capacity of formal sports facilities.	Demand for formal sports and leisure facilities from construction workforce.	On-site recreation and leisure facilities within Accommodation Campus.	Major Beneficial **(Significant)** at all scales.	None.	Major Beneficial **(Significant)** at all scales.

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
		Off-site recreation and leisure facilities in Leiston (3G pitch and MUGA).			
District Council services (waste, cleaning, environmental and public health).	Effect of the construction workforce on demand for regulatory and environmental services.	Sizewell C Waste Management Strategy.	Negligible **(Not Significant)** at District scale.	None (though may draw on public services contingency fund).	Negligible **(Not Significant)** at District scale.
Policing services and community safety.	Effect of the construction workforce on crime and policing.	Accommodation Campus and Caravan Site.	Negligible **(Not significant)** at Suffolk Constabulary scale. Moderate Adverse **(Significant)** at local (ward) scale.	Additional measures set out in the Community Safety Management Plan Financial compensation.	Negligible **(Not significant)** at Suffolk Constabulary scale.
Fire and rescue services.	Effect of the construction workforce on provision of fire and rescue services.	Accommodation Campus and Caravan Site. Trasport Incident Management Plan.	Negligible **(Not significant)** at Suffolk Fire and Rescue Service scale. Minor Adverse **(Not Significant)** at local (ward) scale.	Additional measures set out in the Community Safety Management Plan Accommodation Management System. Financial compensation.	Negligible **(Not significant)** at Suffolk Fire and Rescue Service scale.
Community cohesion / integration.	Effect of the construction workforce community cohesion and integration.	Various – See Table 9.49.	Minor Adverse **(Not Significant)** at all scales.	Various – See Table 9.49.	Negligible or Minor Adverse **(Not Significant)** at all scales.
Inter-relationship Effects – Construction					
Communities,	Effect of socio-economic	Various inherently	Negligible	Community Fund	Negligible

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
community facilities and homes	effects combined with other environmental e.g. transport effects	cross-aspect – see Section 9.7 (d) (vi)			
Operational Effects					
Labour Market.	Effect on local direct employment.	**Employment, Skills and Education Strategy** provided in **Appendix A** of the **Economic Statement**	Moderate Beneficial **(Significant)** at County scale.	None	Moderate Beneficial **(Significant)** at County scale.
Labour Market.	Effect on local indirect employment / economic effects.	None	Moderate Beneficial **(Significant)** at County scale.	None	Moderate Beneficial **(Significant)** at County scale.
Local / regional economy.	Effect on business and supply chain through procurement of goods and services.	None	Moderate Beneficial **(Significant)** at Regional scale.	None	Moderate Beneficial **(Significant)** at Regional scale.
Private rented accommodation sector.	Effects on capacity and operation of the private rented accommodation sector.	None	Negligible **(Not Significant)** at all scales.	None	Negligible **(Not Significant)** at all scales.
Owner occupied accommodation sector.	Effects on capacity and operation of the owner-occupied accommodation sector.	None	Negligible **(Not Significant)** at all scales.	None	Negligible **(Not Significant)** at all scales.
Public services.	Effects on net additional demand for public services.	None	Negligible **(Not Significant)** at all scales.	None	Negligible **(Not Significant)** at all scales.

Receptor	Impact	Primary or Tertiary Mitigation	Assessment of Effects	Additional Mitigation	Residual Effects
Community cohesion / integration.	Effects on population change, community cohesion and integration.	None	Negligible **(Not Significant)** at all scales.	None	Negligible **(Not Significant)** at all scales.
Inter-relationship Effects – Operation					
Communities, community facilities and homes	No impact	None	Negligible	None	Negligible

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APPENDIX B – HINKLEY POINT C PEAK CONSTRUCTION: IMPACTS MONITORING AND AUDITING STUDY (2023-24)

(Source: https://radar.brookes.ac.uk/radar/file/f1f2dbe6-7c73-477a-955e-dd46ab4edeed/1/Final-Report-HPC-Peak-Construction-Nov-2024.pdf)

HINKLEY POINT C PEAK CONSTRUCTION: IMPACTS MONITORING AND AUDITING STUDY (2023-24)



Commissioned by the Local Government Association New Nuclear Local Authorities Group (NNLAG)

Impact Assessment Unit (IAU), School of Built Environment, Faculty of Health, Science and Technology, Oxford Brookes University

November 2024

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Foreword

The New Nuclear Local Authorities Group (NNLAG) is delighted to present this second study of impacts of the construction stage of Hinkley Point C (HPC) New Nuclear Build. As a follow-on by Oxford Brookes University from their initial study of early years construction of HPC in 2018/19, it provides a timely update and further insight into the practicalities of impacts monitoring, now that HPC is nearing peak construction. Much has happened in the nuclear sector of the UK over the last five years, not least the creation of Great British Nuclear, the development consent and commencement of Sizewell C, and the advancement of SMR technology, which is reflected in the study.

Nuclear power projects are unique in their complexity, scale and longevity, which means that changes from the pre-examination stage to implementation are inevitable. This study is important in its recognition of the difficulty in predicting all impacts of a large infrastructure project. This means strong and accurate monitoring, and an adaptive approach to impact assessment and mitigation, is essential for a smooth delivery of a project.

Learning from Hinkley Point C provides vital information for new nuclear sites that follow on – be it large scale, small modular or nuclear fusion projects. Many of the findings are also applicable to other major infrastructure projects, including all Nationally Significant Infrastructure Projects (NSIPs). There is not much research available about the implementation of NSIPs, so this study will hopefully further inform and shape the debate of what good implementation and monitoring of NSIPs should look like – as part of the Government's NSIP reform as well as for any individual project being developed in the country.

We hope that this document will be a useful reference point for local authorities, project promoters and their teams, and Government, be it for nuclear or other infrastructure projects, to better plan for and implement their projects in a way that maximises benefits and minimises negative impacts, to the advantage of all parties.

Cllr Richard Rout, Suffolk County Council, Chair of the New Nuclear Local Authorities Group, October 2024

About NNLAG

NNLAG is a Local Government Association (LGA) Special Interest Group is the UK's principal local authority forum for debate and the sharing of knowledge, experience and best practice on new nuclear developments. It consists of 10 Local Authorities from across the UK that already host or are likely to host nuclear new build projects: Anglesey County Council, Bassetlaw District Council, Cumberland Council, East Suffolk Council, Essex County Council, Folkestone and Hythe Council, Maldon District Council, Somerset Council, South Gloucestershire Council, and Suffolk County Council.

This study was funded jointly by four of its member organisations - Suffolk County Council, Essex County Council, Cumberland Council and East Suffolk Council – with in-kind support from Somerset Council, and is supported by all its members.

Executive Summary

The Aims of the Study

This study is the second study of the impacts of the construction stage of Hinkley Point C (HPC) New Nuclear Build (NNB), one of the largest construction projects in Europe. The first HPC study (IAU/NNLAG 2019) focused on the impacts of the early years of construction. The main aim of the second HPC study is to assess the actual socio-economic and biophysical impacts at peak construction (with peak as measured by the size of the workforce) and to compare those with predictions. The study also seeks to explain any differences, how they can be managed and provide recommendations for future planning and assessment processes. The report has three elements:

1. Review of implementation of HPC Study 1 recommendations
2. Refresh of HPC Sector Impacts for HPC Peak Construction
3. Examination of relevance for other nuclear and other NSIPs

1. Review of implementation of HPC Study 1 recommendations

The review of follow-up measures on the 2019 HPC Study 1 recommendations covers both actions to fill gaps in the HPC monitoring organisation and in data sources. In summary, there is continuing good availability and continuity of data on many key impacts of the HPC project primarily through EDF Energy (EDFE) reporting via the Socio-economic Advisory Group (SEAG) and the Transport Review Group (TRG), and through the various community fora. However, on some 2019 recommendations progress appears more mixed. For example whilst there appears to be progress on the organisation of the monitoring of accommodation and environmental monitoring, there is still little publicly available environmental data. There are also continuing limitations on the availability of disaggregated employment information from the six-monthly Workforce Surveys. Administrative issues, including the reorganisation of the Somerset authorities, which initially delayed the public availability of data, are now largely resolved.

2. Refresh of HPC Sector Impacts for HPC Peak Construction

This is the main section of the report. The refresh of the HPC Sector Impact Indicators uses the same three-step approach as in the early construction impacts HPC Study 1: impact identification, assembly of monitoring information for key indicators/KPIs and auditing of findings against targets. As for the initial 2019 HPC Study 1, this new peak construction study is also based on information and data that is already or can be made publicly available, to maximise its credibility and to allow NNLAG to make the study publicly available and utilise it as evidence in support of consultation responses/ evidence at examination for other projects. The main sources of such data for the refresh are again the quarterly reports of SEAG and TRG, plus the Minutes of the various community fora (Community, Site and Transport). The peak construction period to date, as defined by workforce numbers was the 2023-2024 period, although the peak is likely to run for longer, and probably even higher, for several more years. As for the first study, the main spatial scope of the local impacts assessment is the 90 minutes commuting time CDCZ (Construction Development Commuting Zone), and various local authority areas – although the various Somerset districts merged in the April 2023 reorganisation into Somerset Council.

An additional complexity to this study has been a major review, 2019-2022, by EDFE of the likely size of the peak construction workforce and associated socio-economic indicators (Uplift 1). This revealed that in order to maintain safety and quality standards and the construction programme, there was a need to increase the peak number of workers on site from 5,600 to 8,600**.** EDFE produced a set of six Uplift Topic Papers, covering the various sectors, to assess the local impacts of this uplift. The uplift papers are built into each of the report's sector refresh study; in some cases, there are revised indicator targets. There was a further complexity in 2024 with work by EDFE on another uplift plan (Uplift 2) that is likely to increase peak employment to over 12,000, with additional mitigations on the anticipated changes in accommodation, transport, health and other impacts. The detailed papers underpinning Uplift 2 were not publicly available at the time of this report and there is only limited coverage of possible impact implications.

The audited findings of the 2023-2024 peak period impacts have a similar overall pattern to those of the early construction stage, but with some changes of note as follows in Table E1. The colour coding system is the same as used for Study 1, as set out below:

DG	Predictions very accurate with actuals; fully compliant
LG	Most predictions are good, but with a few topic and/or time gaps, and inaccuracies; largely compliant
A	Mixed accuracy/with several topic and/or time gaps, and inaccuracies; only partially compliant
O	Prediction inaccuracies/gaps in many areas; very limited compliance
R	Prediction very inaccurate; non-compliant
B	No information available; auditing not possible at the time of the study

(NB: letters added to colours for black and white printing, and to aid those with colour reading issues)

Table E1: Summary of the audited findings of the 2023-2024 peak period impacts

Economic Development: good performance against many indicators including local employment content, training and education, apprenticeships, jobs brokerage, local supply chain inputs and tourism. Mitigation and enhancement measures also appear to be working well, including the very significant maintaining of the local content percentage as total numbers rise fast. Yet, on the other hand, the Uplift 1 predicted and very significant construction totals are badly out after only a very short period after the new predictions.	DG	O
Accommodation: findings on the spatial distribution of both No-Home Based (NHB) and Home –Based (HB) workforce appear improved against predictions, compared with the early construction stage. There is still some skew in the tenure mix towards the Private Rented Sector (PRS), but the increase in campus provision has been significant. The housing support strategy, and the resultant delivery of bedspaces, appear to be working well.	LG	A
Social and Community: continuation of good performance against many of the impact indicators. For health, the staffing growth of the on-site Medical Campus has supported well the growth in workforce. For community safety, mitigation measures, including the Worker's Code of Conduct appear to be working well in controlling crime, relative to workforce numbers. There are some possible issues with schoolchildren numbers becoming much higher than the original predictions.	DG	A

Transport: There is a continuation into the peak period of good performance against predictions for many transport indicators, including workforce journey by bus to the main site, and the freight Delivery Management System. More mitigation measures, including the jetty and more P&R sites, are also now in place. Less positively, the car share system to P&R sites continues to be less effective than predicted, and there is the continuing issue of fly parking.	DG	O
Biophysical and Environmental Health: It is good to see a new set of KPIs to be reported to a new Environmental Monitoring Group. However, as for the earlier study, the topics addressed in this section still lack the detailed publicly available impact data to complete an audit. It must be assumed that HPC environmental impacts are well regulated with monitoring mainly related.to any exceedances of standards and thresholds. However, there may be a need for additional monitoring in relation to potential impacts of a currently proposed material change.	LG	B

A number of factors influence such findings, some positively, others less so :

- *Positive factors* include the implementation of the transformational array of skill training measures, accommodation campus developments (including the Medical Centre), Park and Ride (P&R) and the site bus service, Workers Code of Conduct and community safety initiatives, and the implementation of many management plans and EDFE funding initiatives (including for housing and community impact mitigation).
- *Factors that are more negative* include the failure of Uplift 1 to anticipate the scale of the overlap between the Civils and Mechanical and Electrical phases of construction and the Mechanical, Electrical and Heating (MEH) worker requirements for future years. Monitoring and reporting of some impacts, especially some disaggregated workforce details and environmental impacts are sparse. The definitions of some indicators, especially '*what is a worker'*, are still under debate.

3. Relevance for Other Studies

Sizewell C and other NNB

The Suffolk local authorities' Local Impact Report (LIR) made good use of the findings of the 2019 HPC Study 1 as a basis for supporting arguments in the Sizewell C (SZC) examination and in recommendations and conditions in the SZC Development Consent Order (DCO). The Examining Authority also noted the importance of impacts monitoring for the SZC project, as developed in the DCO Requirements and Conditions, in various project construction Management Plans, and in the Planning Statement. Both the findings from the early study and this current study raise further considerations for the project governance of the SZC construction stage, such as: the need to revisit the SZC peak workforce predictions and to clarify the nature of an overall construction stage-monitoring plan. Others for example include the scope for independent auditing of project impacts; and the level of target for some indicators (e.g aiming higher still on local apprenticeships, female employment and skill training provision). Such findings are also relevant for other NNB, which may initially be for Wylfa on Anglesey.

Small Modular Reactors (SMRs)

There is considerable interest in SMRs as part of the future UK energy mix, and as a possible complement and/or substitute for large nuclear reactors (LRs) such as HPC and SZC. They have many claimed advantages, but also potential disadvantages compared with LRs. A standardised

design outcome will help progress, and offset some cost/time and risk concerns. Most impact literature on SMRs has focused to date on risk and safety issues. There seems to have been little work on other impacts, social acceptance, and community capacity issues. Whilst the nature of environmental impacts originating from SMRs or LRs may not differ greatly, and our findings are relevant, it is likely that there will be differences in magnitude. UK government consultation on new nuclear National Policy Statements (NPSs) beyond 2025 might provide the opportunity to include a more streamlined regulatory process and tests (e.g EN-6 lite) that could apply to SMRs and other advanced nuclear projects that are smaller in scale and impacts compared to the LR projects. It may also lead to some opening up of more potential nuclear power locations from the present eight named sites, but this should not weaken the consideration of essential biophysical and socio-economic impacts considerations.

Nuclear Fusion Projects

Operational nuclear fusion power station projects are much further in the distance in terms of contributing to the UK energy mix. However, the UK government is committed to building on the pioneering JET project research and in its latest 2023 strategy has set out a vision for UK fusion that is focussed not just on the UK's unique scientific and technical expertise, but also on commercialising that technology by developing a thriving UK fusion sector. The government has chosen West Burton in Nottinghamshire as the initial fusion power site. The government is also consulting on an NPS for fusion energy. The draft Fusion Energy Policy Statement (FENPS) promotes an open site policy that allows developers to identify, shortlist, assess, select and promote those sites which are best placed to meet the technical requirements of the specific fusion technology selected. It sets out a whole host of factors for consideration when siting a fusion station including, for example: flood risk, population densities, transport infrastructure and grid connection, but it currently fails to consider socio-economic impacts. As our research has shown, the consideration of such impacts is crucial for major energy projects, and new fusion will not be an exception.

4. Generic recommendations

These generic recommendations focus on the theme of this research -- that for an effective and efficient adaptive approach to impact assessment, good monitoring of actual impacts and auditing of these against predicted impacts are essential. Flowing from this, the research report recommends:

- A monitoring and auditing framework covering key socio-economic and biophysical indicators should be an integral, clear and easily identifiable element in each of the project Environmental Statement, Development Consent Order and in S106 agreements (as appropriate).
- In addition to covering socio-economic and biophysical impacts, it should cover key stages in the lifecycle of the project, and not just focus on peak construction.
- A clear set of KPIs agreed pre-application (primarily between the developer and local authorities) and easily located in the documentation, provide the essential first step to monitoring and auditing. It is important that key definitional questions, such as 'what is a worker,' are addressed at an early stage.
- Monitoring is a prime responsibility of the developer, in association with the local authorities, the community, and other relevant agencies. Formal data sharing agreements are recommended.
- Quantitative data should be collected on a consistent basis; there is a need to avoid potential bias in content from proponent–led data, and use should be made of community stakeholder knowledge and opinions, which may be qualitative in content.

- An independent body preferably provides the auditing of the monitoring information against predictions. Such auditing can provide a valuable check on findings and a neutral position between the various agencies involved in the project.
- All monitoring and auditing information should be publicly available, and 'published' on a regular basis in an agreed online format based on the initial monitoring and auditing framework. Annual Monitoring and Auditing reports are recommended.
- A rigorous approach to monitoring and auditing, involving primary information collection, can be resource intensive. A monitoring light and proportionate approach, using publicly available data and focussing on significant impacts, as in this latest HPC study, can provide a useful way forward, given developer and local authority co-operation.
- Findings from monitoring and auditing can provide the building blocks for any additional impact mitigation and enhancement measures, and updating of predictions in an adaptive assessment and management approach.
- Monitoring and auditing reports provide a vital resource for future major project developments in all their various sectors. There should be a repository for such reports (PINs re NSIPs—although recent activity not encouraging?)

List of Abbreviations used in the Study

AD	Associated Development
AMR	Advanced Modular Reactor
CDCZ	Construction Development Commuting Zone
CIM	Community Impacts Mitigation (fund)
CoCP	Code of Construction Practice
CTMP	Construction Traffic Management Plan
CWDS	Construction Workforce Development Strategy
CWTP	Construction Workforce Travel Plan
DCO	Development Consent Order
DMS	Delivery Management Strategy
EcoMP	Ecology Management Plan
EDFE	Electricite de France Energy
EIA	Environmental Impact Assessment
EMMP	Environmental Management and Monitoring Plan
EMQR	Environmental Monitoring Quarterly Report
EPSRC	Engineering and Physical Sciences Research Council
ES	Environmental Statement
ExA	Examining Authority
FENPS	Fusion Energy National Planning Policy Statement
FOAK	First Of A Kind
GW	Gigawatt
HB	Home based (workers)
HGV	Heavy Goods Vehicle
HMG	His Majesty's Government
HMO	Home of Multiple Occupation
HPC	Hinkley Point C
HTFG	Health Task and Finish Group
IAU	Impacts Assessment Unit
IMD	Index of Multiple Deprivation
IPA	Infrastructure and Planning Authority
JET	Joint European Torus
KPI	Key Performance Indicator
LGA	Local Government Association
LIR	Local Impact Report
LR	Large Reactor
LSOA	Lower Super Output Area (for IMD)
LWR	Light Water Reactor
MEH	Mechanical Electrical and Heating
MW	Megawatt
NHB	Non-Homed based (workers)
NHS CCG	National Health Service
NIC	National Infrastructure Commission
NIPA	National Infrastructure Projects Association
NNB	New Nuclear Build
NNLAG	New Nuclear Local Authorities Group
NPS	National Policy Statement
NSIPs	Nationally Significant Infrastructure Projects
ONS	Office of National Statistics
P&R	Park & Ride
PINs	Planning Inspectorate

PRS	Private Rented Sector
PWR	Pressurised Water Reactor
RAG	Read Amber Green (colour coding system)
SDC	Sedgemoor District Council
SEAG	Socio-economic Advisory Group
SMR	Small Modular Reactor
SRN	Strategic Road Network
SZC	Sizewell C
TA	Transport Assessment
TRG	Transport Review Group
UKAEA	United Kingdome Atomic Energy Authority

PART 1: CONTEXT

1. Introduction -- Aim and Scope of the Research

1.1 Aims of the Study

As in most aspects of life, we should learn from experience, and this is certainly the case for the environmental impact assessment (EIA) process. This is particularly so when we are dealing with the socio-economic and biophysical impact of Nationally Significant Infrastructure Projects (NSIPs), such as Nuclear New Build (NNB), where uncertainty and complexity are key features. Such major projects have long construction periods and much longer operational lives. Assessment should be an iterative learning process with monitoring and auditing of actual impacts as essential elements in the process over the project lifecycle. Monitoring involves the identification and measurement of actual impacts; auditing is the comparison of actual impacts with those predicted. Yet there is little experience in this area, as noted in a report by the National Infrastructure Projects Association (NIPA):

'There has been little research on the results of the effectiveness of the environmental monitoring and management during the construction of NSIPs. The sharing of the findings of monitoring could improve decision-making, could provide reassurance to communities for whom the anticipation of impact can be more daunting than the reality, and enable developers to improve environmental management practices' (NIPA 2019).

The report refers to the ongoing Oxford Brookes University Impacts Assessment Unit (IAU) research on HPC impacts monitoring and auditing to help to fill the research gap.

This study is the second study of the impacts of the construction stage of Hinkley Point C (HPC) NNB, one of the largest construction projects in Europe. The first HPC study (IAU/NNLAG 2019) focused on the impacts of the early years of construction. The aim of the second HPC study is to assess the actual socio-economic and biophysical impacts at peak construction (with peak as measured by the size of the workforce) and to compare those with predictions. The study also seeks to explain any differences, how they can be managed and provide recommendations for future planning and assessment processes. This project follow-up can be of great value for the more effective management of current projects and for consents and licenses for future projects.

The Oxford Brookes University IAU has undertaken both HPC studies. The IAU has a long research history of impact assessment of major energy projects, including the pioneering study of the construction of Sizewell B nuclear power station (Glasson 2005). As with the first HPC study, the New Nuclear Local Authorities Group (NNLAG) of the Local Government Association (LGA) has provided some funding support.

1.2 Scope

The work has a number of elements. ***The first element was to revisit the HPC Study 1 recommendations to assess how the project has addressed them***. The recommendations follow very directly from identified gaps in organisation, process and data. They relate primarily, but not exclusively, to the activities of EDF Energy (EDFE) as the developer. The extent of progress on some of the recommendations was dependent on work on refreshing the Red/Amber/Green (RAG) indicator ratings for the various impact sectors, including improving access to the availability of disaggregated employment information from the HPC Workforce Survey.

The second, and most important and substantial element in the research, was to revisit and to refresh the RAG indicator ratings, for a set of Key Performance Indicators (KPIs) across the topic areas. As per recommendations from the previous study, there should be a focus on a narrower set of key indicators drawing on HPC Study 1 findings; but a consideration of possible opportunities for any limited filling of any key identified gaps, as long as information is publicly available. There should also be more study of construction and operational stage employment impact as possible (jobs, training, opportunities, possible long-term impacts etc). The stage included the following steps:

- *An identification of set of key indicators/KPIs across the six sectors used in HPC Study 1 (i.e: economic development, transport, social and community, accommodation, environmental health and biophysical environment).*
- *Assembly of monitoring information on the indicators for 2023/24 peak construction employment, including trend data as available, using publicly available information.*
- *Auditing of indicator performance against KPI projections from relevant contexts (i.e. original ES, DCO and S106 documents, and more recent refresh of projections undertaken for EDFE in 2020/22 in relation to increase in projected peak workforce to 8500; new S106 etc). This should use the original HPC Study 1 RAG approach to allow comparisons over time*.

The main sources of data for the refresh are from the quarterly reports of the Socio-Economic Advisory Group (SEAG) and the Transport Review Group (TRG), plus the Minutes of the various Fora (Community, Site and Transport). There is some data on several key topics, including especially employment, transport, social and community, accommodation and a little on the biophysical environment. The transport and accommodation are improved and more in depth than for HPC Study 1 but there is still a lack of in-depth and publicly available information on several key economic indicators from the 6-monthly Workforce Surveys. As for the first HPC study, the primary spatial scope of the local impacts assessment is the 90 minutes commuting time CDCZ (Construction Development Commuting Zone), and various local authority areas – although the various Somerset districts merged in the April 2023 reorganisation into one Somerset Council.

A third, more limited element of the research, was to examine the relevance of the work to other likely NNB projects, especially the immediate Sizewell C (SZC), to more long-term emerging new nuclear technologies, and to other NSIPS. The SZC work explored the extent to which key documents, including the Local Impact Report (LIR) (Suffolk Councils 2020), the Sizewell C Environmental Statement (ES, EDF 2019) and the Examination Report and Development Consent Order (DCO) drew on some of the findings and recommendations of the earlier HPC Study 1. The work reports on both coverage of findings and recommendations for SZC proposals/requirements etc. It also adds any implications for SZC of the findings of this HPC Study 2.

The review of findings for potential other new nuclear technologies includes particular reference to SMR (small modular reactors), and nuclear fusion projects. The review draws on international and academic documentation on these emerging technologies, plus emerging proposals for implementation in the UK. A final review examines more generally any implications of the research for other NSIPs with major long-term construction periods**.** Reflecting the three main elements of the research, the report has three main sections:

1. Context

2. Refresh of HPC Sector Impacts for Peak HPC Construction

3. Relevance for Other Studies.

1.3 Research Parameters

The research uses and adapts as appropriate the same set of parameters as used for the initial early stage construction study (HPC Study 1 IAU/NNLAG 2019).

***Key elements of the project**:* the study includes the impacts of the main site development, and also associated developments (especially accommodation campuses and transport projects), at peak construction in 2023-2024.

***Impacts focus**:* the research identifies, monitors and audits key predicted impacts under the topic headings (economic development, traffic etc), including an assessment of good predictions as well as those falling outside predicted ranges, and unforeseen impacts.

***Testable predictions**:* there is a focus on testable predictions, or statements of developer intent/requirements, rather than on general discussions of possible impacts.

***Monitoring and auditing accuracy**:* for some predictions, auditing accuracy will be a matter of whether a requirement has been carried out in a timely manner; for others accuracy will involve an assessment of whether the actual impacts fall within predicted ranges, which will be specified as far as possible.

Publicly available information: as for the initial HPC Study 1, this study will also '*be based on information and data that is already or can be made publicly available, to maximise its credibility and to allow NNLAG to make the study publicly available and utilise it as evidence in support of consultation responses/ evidence at examination.'* There are degrees of public availability and, as appropriate and with provider's permission, the study seeks to add to the stock of relevant publicly available information.

Range of impact scales: impacts are audited across a range of spatial scales, as included in predictions. For example, noise impacts may be assessed at the level of local villages adjacent to the site and transport routes, other impacts may be district and/or county wide. Some impacts, such as employment, supply chain and traffic, may stretch much wider on a sub-regional and 90 minutes CDCZ (construction daily commuting zone) scale.

Baseline context: the disaggregation of project-related impacts from baseline trends can raise methodological challenges. Data will be available that indicate local trends in a number of variables, such as unemployment levels, traffic volumes and crime levels. However, there can be problems when we attempt to explain these local trends. To what extent are they due to (a) the construction project itself, (b) national and regional factors or (c) other local changes independent of the construction project? It may be straightforward to isolate the role of national and regional factors, but the relative roles of the construction project and other local changes may sometimes be difficult to determine.

A snapshot in time: this short study seeks to apply these parameters and criteria to a comprehensive set of key impacts for the peak construction stage of the HPC project, but in such a timescale the

focus will be on key strategic impacts. There is not scope for additional tailor-made studies to collect new data.

1.4 Research team

The IAU team comprised Prof. John Glasson (research lead and main author), Dr Bridget Durning (admin lead), and Visiting Prof. Martin Broderick (specialist inputs). The team wish to acknowledge the support of the NNLAG Steering Group, especially Michael Moll (Suffolk CC) and the officers from the Somerset Local Authorities, especially Joanna Whitehead and Andy Coupe, who have helped to identify and interpret various data sources.

2. Follow-up on HPC Study 1 Recommendations

The recommendations follow directly from the gaps identified in s5.4 of the earlier HPC Study 1 (IAU/NNLAG 2019). They relate primarily, but not exclusively, to the activities of EDFE as the developer. It is noted where other stakeholders should be involved. The section on the right of Table 2.1 provides a report on current responses to the issues raised in the 2019 report, set out on the left.

Table 2.1: Specific 2019 issues and current responses for HPC construction stage monitoring issues

	Issues raised in 2019 report	**Current responses in 2023/24**
Gaps in monitoring organisation and process	• There is a strong case for reviewing the operational effectiveness of the various monitoring groups feeding especially into the SEAG. For employment, this is already in hand, as outlined in the Construction Workforce Development Strategy (CWDS) and Implementation Plan (EDFE 2018), with plans to rationalise workforce- monitoring arrangements by assessing progress in three strategic themes: Employment, Skills, Apprenticeships and Young People. Associated with this should be a review of the utility of some of the current indicators/KPIs used in some of the various sectors (eg in accommodation). There is a need for an environment-monitoring group, and an improvement in the operation of the accommodation-monitoring group.	• Quarterly meetings of SEAG, with major membership from NNB Genco HPC, local authorities, NHS CCG, Avon and Somerset Police, Somerset Community Foundation and others, report on data across the main impact sectors. The sectors include Employment/ Skills/Supply Chain/Tourism, Transport, Accommodation, Health/Community Safety/Community Relations, and Environment data findings derived from meetings of various monitoring sub-groups. • The scope of the sub-groups appears to have improved since HPC Study 1, especially for Accommodation and Environment sectors. It is good to see the introduction of an Environment monitoring sub-group, as recommended. Since April 2023, local authority membership has shifted from Districts and Somerset County to the new Somerset Council authority. • TRG continues to operate efficiently as the formal group monitoring workforce travel and construction traffic activities. Major membership is again from NNB Genco HPC, Somerset LAs, and National Highways. TRG produces a quarterly monitoring report.

		• The various community fora – Community Forum, Transport Forum and Main Site Neighbourhood Forum – continue to meet quarterly and the minutes provide a valuable barometer of locally perceived issues.
	• An improved, full, transparent and publicly available Workforce Survey is needed to underpin better the auditing of many socio-economic impacts (again in hand, but needs to be fully and openly reported to SEAG). There may also be a case for reviewing the content and management of the onboarding (worker induction) survey.	• There is a Workforce Survey every six months (December for Winter Survey and June for Summer Survey) with results analysed and disseminated by EDFE primarily via SEAG meetings. It is good to see more information on the sample/confidence basis of the survey, plus some additional workforce information – including age and gender information, time worked on project, employment by contractor, in addition to detailed information on accommodation (including Non –Home Based [NHB] families) and on Transport and Travel. However, the full scope of the survey and its findings is still unclear, nor is it clear whether a full and transparent Workforce Survey is publicly available. There is no information on the scope of the onboarding (worker induction) survey.
	• Some Economic Development data (eg on impact of HPC construction on employment in local firms) is more qualitative. A survey would help. Other topics may also benefit from some tailor-made survey activities at intervals during the construction period. This may involve adding in new questions to the Workforce Survey).	• The Socio-Economic Impact reports (2022, 2023) produced by EDFE provide some overview information on the important supply chain impact of the project on local and regional SW firms. However, it is unclear whether this information involved a local firm survey dimension.
	• There is a need to pick up the evolution of various socio-economic issues (eg local accommodation tenure, community safety) as the site workforce builds up to peak, and the Bridgwater Campus accommodation becomes more fully used.	• The data reported to SEAG, especially on accommodation, does pick up various evolving socio-economic issues. The impact of the build up to peak construction employment is set out in the refreshing of KPIs in subsequent sections of this report. The accommodation data includes the build-up in use of the Bridgwater and other Campuses and implications for other accommodation tenure groups, especially the Private Rented Sector (PRS).
Gaps in monitoring data	• The monitoring system is not delivering enough accurate and *disaggregated employment information*, especially on local content by skill category and by	• There is no publicly available information from the Workforce Survey on local employment by skill category. As such, it is not possible to assess whether local people are gaining some of the most

	disadvantaged and under-represented groups (see organisational recommendation above).	skilled jobs, and whether local training initiatives are opening up opportunities to such jobs. Is such information collected in the Workforce Surveys, as recommended here, and as set out by the Joint Councils in discussions on the revised peak workforce in the 2020/21 version of Workforce Uplift papers (April 2021)*? **Breakdown of output from workforce survey to provide:* • *Worker type (Civils; MEH; Professional / Management; Operational; Site Services)* • *Ratio of HB to NHB by worker type* • *Age Profile of the workforce* • *Gender of the workforce* • *Ethnicity of the workforce* • *Workforce reporting a disability* • *HB and Somerset breakdown of the total workforce*
	• Similarly, there is a lack of *disaggregated data on supply chain impacts* in Somerset and districts (see organisational recommendation above).	• There is information reported to SEAG on local business registrations by former Districts, but not on value of contracts by District. In contrast, the annual Socio-Economic Impacts Reports (see EDF 2023, 2024) do provide useful summary supply chain information for UK regions/nations – including for each: the number of companies building HPC, number of jobs expected to be supported and the projected economic value to the region.
	• Various omitted transport issues need to be monitored, and reported to the TRG, including: fly parking, EURO IV (exhaust emissions), deflectograph road condition surveys, increased delay to local drivers and reduced highway capacity, bus passenger movements to site, LGV movements, and take-up of traffic noise insulation scheme. A bulk delivery materials plan should be submitted to LAs by developer before temporary jetty operational	• The Transport Review Group Quarterly Report provides very detailed information on bus and other modes of travel between the various P&R sites, the Main Site and various Associated Development sites. It also provides detailed information on freight traffic movements. There is close monitoring of the ongoing fly parking issue.
	• The data on accommodation is fragmented, limiting effective auditing and monitoring. Targets need to be clarified and data reporting needs to be full and regular. Monitoring the use and users of the accommodation campuses provides a straightforward data opportunity.	• There appears to be improved monitoring and regular reporting of accommodation data, including tenure type numbers of NHB workers by administrative areas, and various housing funding initiatives.

	• Is the wellbeing of the communities local to HPC being adequately monitored (especially the impacts on the older residents), and is the Community Impacts Mitigation (CIM) fund effectively responding to project impacts on local wellbeing? (also LA issue)	• Over £15m of the £20m CIM fund is now allocated. There is a wide mix of projects targeted across various age groups in the local community, with many responding to local wellbeing issues.
	• There is a need to update some relevant contextual LA and central government indicators (eg IMD, fear of crime, housing affordability) which are not available until mid-2019 onwards (also LA issue).	• This is now possible as now have 2019 IMD information that covers the early years of HPC— although not the peak. The various IMD domains in relevant sectors – e.g. transport and health — are covered in the sector studies.
	• There is a major absence of *publicly available* information on environmental health and biophysical environmental impacts. Data collected by various stakeholders (especially EDFE and the LAs) should be publicly reported as part of the monitoring and auditing process (also LA issue).	• There is some improvement with a new Environmental sub-group and improved reporting of environmental monitoring. However, as for the earlier study, the topics addressed in this sub-group still lack the detailed publicly available impact information needed to complete an audit.

In summary, whilst there is continuing good availability on much impacts monitoring data through EDFE reporting via SEAG and TRG, progress on the 2019 recommendations appears mixed. For example whilst there appears to be some progress on accommodation and environmental monitoring, there are continuing limitations on the availability of disaggregated employment information from the Workforce Survey. Administrative issues, including the reorganisation of the Somerset authorities, initially delayed the public availability of data.

PART 2: REFRESH OF SECTOR IMPACT INDICATORS FOR PEAK HPC CONSTRUCTION

3. Introduction

The refresh of the HPC Sector Impact Indicators uses the same three-stage approach as in the early construction impacts study (HPC Study 1, IAU/NNLAG 2019): impacts identification, assembly of monitoring information for key indicators/KPIs and auditing of findings against predictions. As for the initial 2019 study, this new peak construction study is based on information and data that is already or can be made publicly available, to maximise its credibility and to allow NNLAG to make the study publicly available and utilise it as evidence in support of consultation responses/ evidence at examination. The main sources of such data for the refresh are again the quarterly reports of the Socio-Economic Advisory Group (SEAG) and the Transport Review Group (TRG), plus the Minutes of the various Fora (Community, Site and Transport). These were all previously publicly available on the Sedgemoor DC website, but availability there lapsed a little in mid-2022, possibly because of staffing pressures, and partly because of pending Somerset local authority reorganisation. However, via the good offices of staff at the new Somerset Council, much data subsequently became available. They continue to be available on EDFE's dedicated HPC website. As for the first study, the main spatial scope of the local impacts assessment is the 90 minutes commuting time CDCZ (Construction Development Commuting Zone), and various local authority areas – although the various Somerset districts merged in the April 2023 reorganisation into Somerset Council.

An additional complexity to our analysis this time around has been a major review, 2020-2022, by EDFE of the likely size of the peak construction workforce and associated socio-economic indicators (Uplift 1). **The indicator update followed from an EDFE '*internal review of the project in 2019 that revealed that in order to maintain safety and quality standards and the construction programme, there was a need to increase the peak number of workers on site from 5,600 to 8,600'*.** EDFE produced a set of six Uplift Topic Papers, covering the six sectors of this and previous reports, to assess the local impacts of this uplift. The conclusions of the review revealed that in order to maintain safety and quality standards and to maintain the programme, the number of workers at the peak of construction would need to increase above the number that was originally assessed within the Development Consent Order (DCO) application. The review highlighted that there would need to be a greater overlap between the Mechanical Electrical and Heating (MEH) and Civils phases of the project and that the number of support and professional/management roles based at the HPC site would be significantly above the number anticipated in the DCO application. The various uplift papers are built into each of this report's sector refresh studies. In some cases, they introduce revised targets; where not, the default position is the original targets/KPIs.

As for the 2019 HPC Study 1, this peak construction indicator refresh includes three key steps for each sector:

-- An identification of set of key indicators/KPIs.

-- Assembly of monitoring information on the indicators for 2023/24 peak construction employment, including trend data as available, using publicly available information;

-- Auditing of indicator performance against KPI projections from relevant contexts (i.e. original ES, DCO and S106 documents, and more recent refresh of projections undertaken for EDFE in 2019/22 in relation to increase in projected peak workforce to 8500; new S106 etc). This should use the original HPC Study 1 RAG approach to allow comparisons over time.

In addition to comments on each impact issue indicator, we have applied a very simple colour code audit (RAG system) as used in the 2019 HPC Study 1 report, ranging from Dark Green (very accurate/compliant), through Amber to Dark Red (very inaccurate/non-compliant). A blue colour coding indicates 'No Information Available' yet. In undertaking the refresh, the progress of any measures or governance proposals implemented since the original study are assessed along with any particular issues that have come up since 2019 and which were not considered in the original study.

There was a further complexity in 2024 with work by EDFE on another uplift plan (Uplift 2). This is likely to increase peak employment to over 12,000, and the length of the peak, with additional mitigations on the anticipated changes in accommodation, transport, health and other impacts. The detailed papers underpinning Uplift 2 were not publicly available for this study, but some likely assessments of implications are included in Section 9 of this report.

4. Refresh RAG Indicator Ratings: Economic Development

4.1. Context: Strategic Issues and Indicator Update

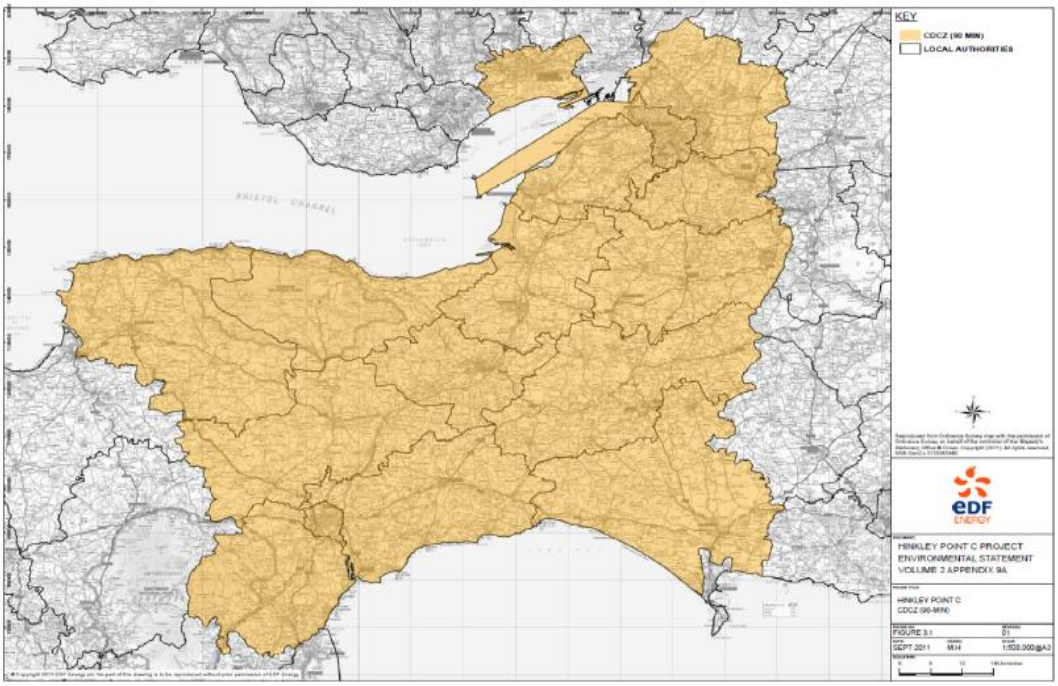
The economic development section focuses on HPC peak construction employment, skills and supply chain impacts and issues. Many local and regional impacts flow from the extent of the local content of construction employment. Home-based (HB) construction workers already have accommodation and ongoing interactions with a whole range of local services (e.g. schools, doctors). In contrast, Non Home-based (NHB) workers place new demands on local accommodation and other services. Local suppliers to the project can have a multiplier effect on local and regional benefits of the project, but there may also be some issues including job displacement from local firms and wage inflation.

The report draws on a range of sources. Our 2019 HPC Study 1 Report on the impacts of early stage construction sets out the sources of key indicators/KPIs. This new peak construction report updates these with information from a set of Topic Papers prepared for the 2021-22 Uplift Study (EDFE 2022). Other key sources of monitoring information are the various reports of SEAG and TRG, supplemented by information from the various community fora, and from other sources such as the Index of Multiple Deprivation (IMD) and local authority data (e.g. Sedgemoor Annual Monitoring Report). Whilst the focus is on publicly available information, we have benefitted from contacts with a number of local authority and EDFE staff.

The Workforce Development Topic Paper (EDFE Feb 2022) sets out some revised objectives and targets for overall peak employment (averaging 8600 over peak period, with c38% HB recruitment), and some revised detailed figures for training, job services, apprenticeships, recruitment from underrepresented groups (e.g. 1 in 5 per outreach intervention), worker retention and others. The Supplemental Agreement to the S106 (NNB Generation Company HPC March 2022) refers to the revised Topic Paper and notes, for example, additional opportunities for local workers and to expand and diversify activity including supporting hard to reach groups to get back to work, plus maximising the benefit of the Hinkley Supply Chain.

However, many of the original indicators/KPIs will continue as the default position where there is no indication of revision of targets. Similarly, the Uplift Topic Paper uses the same CDCZ spatial base which represents the 90-min maximum commuting zone of local Home-Based (HB) workers (See Figure 4.1). Non Home-Based (NHB) workers originate from outside this zone, although they will almost wholly live within this zone during the duration of their time on the project and largely within a 60-min commute zone, during the duration of their time on the project.

Figure 4.1: Hinkley Point C CDCZ



4. 2. Monitoring Findings

Preamble:

A key source of economic development information is the bi-annual Workforce Survey undertaken by an independent market research company. Respondents are encouraged to complete the survey online. The response rate varies; for example, for winter 2022 the sample was low at about 24% of the site workforce with a confidence limit of +/- 2.57%. This was a reduction on previous years, for example for winter 2021 the sample was about 45% with a confidence limit of 1.76%. EDFE provides a short summary of some of the key socio-economic indicators for SEAG and TRG; this approach does exclude some relevant economic development findings – as noted below. Table 4.1 sets out findings and trends in monitoring data on indicators/KPIs.

Table 4.1: Monitoring data on Economic Development indicators/KPIs

Issue	Indicators/KPIs	Findings/trends	Source and comments
Economic Development: Employment/recruitment and skills/training			SEAG from Workforce Survey— except where noted

Size of construction workforce	8600 at peak (Uplift 1 paper)	2021 (Sum) -- 6199 2021 (Win) -- 6656 2022 (S) – 7875 2022 (W) – 8221 2023 (S) – 9789* 2023 (W) -- 10590* 2024 (S) -- 10262* *Based on a worker 5-day rule: be 'working' at HPC Site; not merely visiting, AND have been at Site on at least 5 separate days in the 30 day monitoring period AND have been at Site for at least 37.5 hours in the 30 day monitoring period ' which gives slightly higher figures.	Plus TRG
% CDCZ HB content	Amended to 38% at peak (CDCZ)	CDCZ 2022 (S) – 36% 2022 (W) –35% 2023 (S) – 36% 2023 (W) – 34% 2024 (S) – 35%	
% of workforce with families	% and numbers; prediction 9%	2021 (W) - 9% 2022 (W) – 12% 2023 (W) – 12% 2024 (S) -- 11%	
% and numbers of workforce previously unemployed	8% original target	Jan 2019 was only 1.9%; recent data in 2024 (S) indicates 2.8%. A further 3% of the workforce started work at the site straight from FT or PT education. Contextual data: Somerset unemployment rate for 2022 (Jan to Dec) was 2.9%; GB was 3.6%. Approx 15% of those registering with HPC Job Service are unemployed. HPC is helping young people stay and thrive in Somerset. The local area has seen a 25% growth in young people aged 25-39 - three times greater than the national average (2011-2022).	S106 SCC Report for HPC Education, Employment and Skills 2024 EDFE HPC Socio-economic Impact Report
% and numbers of female workforce	8% original target	2021 (W) – 14% 2022 (W) – 13% 2023 (W) – 13% 2024 (S) -- 13%	
Age profile of workforce	Indicator – profile is a factor influencing impact on various services	Recent workforce surveys (S&W 2023 and S 2024) show a construction site age profile of approx: <35 -- 40% 35 -54 -- 45% >54 -- 15%	
Ethnicity of the workforce		2024 (S) Overall, workforce is approx 82% White (64% White British); 9% Asian/Asian British; 3% Black/Black British, 3% of mixed background and 3% other ethnic groups. This distribution is similar to UK population as a whole (but UK is 74% White British).	
Numbers of apprenticeships; including gender mix	Initial target was 400; then revised to 1000	2021 (Q4) -- 922 2022 (Q3) – 1101 2023 (Q3) – 1200 2023 (Q4) – 1300 (18% female) 2024 (Q2) – 1364 (19% female) Approx 65-70% of apprentices are local (in 90 min CDCZ)	
Job categories for home-based workers.	*Numbers and % total by category for various skill types*	EDFE 13 April 2021 agreed, in an Uplift Monitoring Information Paper, to provide more monitoring information on Workforce from 6-monthly surveys to include:	*Data not available -- dependent on EDFE*

% and numbers of total workforce from vulnerable and disadvantaged groups.	*EDF and contractors equality policies –to employ diverse workforce with focus on gender, ethnicity and disability*	• Worker type (Civils; MEH; Professional / Management; Operational; Site Services) • Ratio of Home-Based to Non-Home-Based by worker type • Ethnicity of the workforce • Workforce who are reporting that they have a disability Only the following additional data is reported: • Home Based and Somerset breakdown of the total workforce • Age profile of the workforce • Gender of the workforce • Ethnicity of the workforce		
Recruitment through Job Brokerage scheme	No specified targets	2019 (Apr) -- 759 2022 (Feb) –1403		
Registrations on Jobs Service system (cumulative)	No specified targets	2019 (Jan) – 15,150 2022 (Nov)—16,014 2023 (Mar) ---16,255 c50% within 90 min CDCZ		
Delivery of local training and skill development programmes	Wide array of programmes	Wide range of programmes: e.g. - Hinkley Support Operative (HSO) Programme (11% female) - Centres of Excellence (e.g Welding). More than 8 000 trained in the various Centres - Young HPC - Occupational traineeships		2022, 2023 and 2024 EDF HPC Socio-economic Impact Reports
Develop new and relevant pipelines from education to employment	*Wide array of training and educational initiatives; with financial commitments (e.g. completion of HSO programme)*	By end of 2021 £24m invested directly into education, skills and employment initiatives, primarily in Somerset/SW.		2022 and 2023 EDF HPC Socio-economic Impact Reports
Impact on local multiple deprivation Issues (economic)		Now have 2019 IMD to compare local findings with earlier 2015 IMD, but does not overlap HPC peak employment. The % of Somerset Lower- layer Super Output Areas (LSOAs) in 20% most deprived in England in the Employment domain increased from 6.7% to 11.3% between 2015 and 2019.		Somerset Intelligence English Indices of Deprivation (2019 Somerset Summary)
Economic Development: Supply Chain				
Somerset and regional supplier registrations	Not stated	Somerset 2021 (W) - 2208 2022 (W) – 2226 2023 (S) -- 2990	Other SW region 2021 (W) - 1775 2023 (S) – 2358	
Number and value of contracts awarded to Somerset and wider SW	£1.5bn for SW region	2021 (Dec)-SW (inc Som) -£3.5bn agg 2022 (Dec)-SW (inc.Som)- £4.1bn agg 2023 (Dec)- SW (inc Som) -£5.3bn agg Estimated £7.3bn by end of construction.		2022 and 2023 EDF HPC Socio-economic Impact Reports; some data

region companies		2021 – 350 businesses in Sedgemoor and West Somerset in HPC supply chain, with projected £500m spend	from EDFE interactive map
Number and value of contracts awarded to companies in other UK regions and nations	Number of companies building HPC, number of likely supported jobs and projected economic value to the region and UK. Original target 57% value to UK.	By end of 2021, 22000 UK jobs, in 3800 businesses supported (with c1400 in SW region). Value of HPC contracts to UK economy of £18bn with 64% of value going to UK companies.	2022 and 2023 EDF HPC Socio-economic Impact Reports
% tourism business confidence; total digital media hits	35% baseline	Was above baseline at 46% in Dec 2018. Lack of recent confidence data. However, tourist perception data -- Survey of impact of HPC on Somerset tourism (2023) indicated that over 90% of tourists not affected by HPC construction activity. But local micro-economic impact of conversion of former Brean Sands tourist venue to temporary HPC workforce campus.	(Qa Research 2023)
Lift and shift implications of movement of non-unique businesses and workers from HPC to SZC	No specified targets.	Some limited reference to worker (including apprentices) movement from HPC to SZC – although premature as SZC funding not finalised (early 2024). Jobs Service registrations now include SZC, with 663 by Mar 23. Considerable local authority interaction between Somerset and Suffolk on impacts and their management.	

4.3. Auditing of Findings

Preamble:

In addition to comments on each impact issue indicator, we have applied a very simple colour code audit (RAG system) as used in the 2019 report, ranging from Dark Green (very accurate/compliant), through Amber to Dark Red (very inaccurate/non-compliant). A blue colour coding indicates No Information Available (NIA) yet. Table 4.2 provides an audit of actual against predicted economic development impacts.

Table 4.2: Audit of actual against predicted Economic Development impacts.

Impact Issue Indicator	Commentary on actual vs predicted impacts Commentary on performance in relation to objectives and targets (as available)	Summary RAG colour coding
Economic Development: Employment/recruitment and skills/training		
Size of construction workforce	Total site workforce figure in the Winter of 2023 is 25% above the predicted peak of 8600. The 5-day rule data gives a higher figure. Whilst these are the key site figures, there are some additional off site workers including campus accommodation, operational and some management staff. In total, there may be c1000 others located primarily locally.	O
% CDCZ HB content	CDCZ HB figure of 34-36 % is close to prediction; very positive given the substantial growth in the total workforce.	DG

% of workforce with families	Recently 11-12% of total. Percentage figure rising with MEH stage and buildup of operational workforce. Over 1000 staff with families is significant re impacts on accommodation, education, health services etc.	LG
% and numbers of workforce previously unemployed	Limited information, but in total, recruitment from unemployed plus those straight from education is about 6%.	A
% and numbers of female workforce	Good level of female employment. Well above original default figure.	DG
Numbers of apprenticeships; including gender mix	Excellent performance and already well above aspirational target of 1000. Female 18-19% is above female % employment on the site.	DG
Job categories for HB workers; % and numbers of total workforce from vulnerable and disadvantaged groups	No information available	*B*
Recruitment through Job Brokerage scheme (cumulative)	Cumulative total has almost doubled in last three years. This is better than the London Olympics job brokerage scheme that placed c1250 people in total over life of that construction project.	DG
Registrations on Jobs Service system (cumulative)	Maintaining a good level of registrations, but little cumulative growth over last three years; but may be due to registration/job churn and tightening labour market.	DG
Delivery of local training and skill development measures	Continuation of wide range of training and skill development initiatives, underpinned by substantial financial commitments by EDFE. Take-up appears to be good. New training places (30,000 to completion) available to meet demands of peak construction. New Centres of Excellence – Mechanical Engineering, Welding and Electrical.	DG
Develop new and relevant pipelines from education to employment	Continuation and development of school engagement initiatives; Bridgwater and Taunton College partnership with the project.	**DG**
Reduction in local economic deprivation indices	Review of IMD for localities in West Somerset and Sedgemoor near to the HPC site do not show any overall improvement in deprivation rankings nationally between 2015 and 2019. This period only includes early construction so not good indicator for peak construction.	A
Economic Development: Supply chain		
Somerset and regional supplier registrations	Continuing high level of registrations.	DG
Number and value of contracts awarded to Somerset and wider SW region companies	Performance far exceeds, indeed trebles, the original predicted £1.5bn value of contracts for SW region. Could still do with better publicly available information on local contracts.	DG

Number and value of contracts awarded to companies in other UK regions and nations	With 64% of value of HPC contracts likely to go to UK companies, HPC appears to be providing positive economic impacts across the UK economy.	DG
% tourism business confidence; total digital media hits	Survey of impact of HPC on Somerset tourism (Qa Research 2023) indicated that over 90% of tourists not affected by HPC construction activity. However, some specific concern about impacts of project use of Brean Sands accommodation on local tourism in that area.	LG
Lift and shift implications of movement of non-unique businesses and workers from HPC to SZC?	Implications of potential electric car battery factory being located in Bridgwater may provide, in the longer term, local opportunities for ex-HPC construction workers and linked businesses. Re Sizewell shift --- Job Registration Scheme now includes growing number interested in SZC	LG

5. Refresh RAG Indicator Ratings: Accommodation

5. 1. Context: Strategic Issues and Indicator Update

The accommodation of the NHB workforce and the implications for local accommodation markets have constituted some of the most significant socio-economic impact issues in the planning and management of HPC in the local community to date. The original accommodation strategy suggested a distribution of the NHB workforce (then estimated to be 3,700 workers at peak) between five types of accommodation:

• Campuses;
• Private Rented Sector (PRS);
• Owner Occupied;
• Tourist; and
• Latent Accommodation – including spare rooms and previously un-rented properties.

Issues raised in our earlier HPC Study 1 report included, in particular, impacts on the PRS and the location of those impacts, with a much larger impact on the Bridgwater area than predicted in the ES and DCO. Important mitigation measures included the provision of two purpose built workforce campuses, although only the Site Campus was operational at the time of the previous HPC Study 1 report. The Bridgwater Campus has subsequently opened, recently followed by the Brean Sands Campus based in the pre-existing Pontins self-catering tourist venue. There have also been numerous local housing market support initiatives by EDFE as set out in the DCO accommodation strategy and Section 106 agreement.

As with the Economic Development sector, the accommodation sector study draws on a range of sources. Our 2019 HPC Study 1 Report on the impacts of early stage construction sets out the sources of key indicators/KPIs. This new peak construction report updates these with information from topic papers prepared for the 2021-22 Uplift Study (EDFE 2022). Other key sources of monitoring information are the various reports of SEAG and TRG, supplemented by information from the various community fora, and from other sources such as the Index of Multiple Deprivation (IMD) and local

authority/housing market data (e.g. Sedgemoor Annual Monitoring Report and Somerset Intelligence). However, many of the original indicators/KPIs will continue as the default position where there is no indication of revision of targets.

The HPC Workforce Uplift – Updated Accommodation Topic Paper (EDF 2022) sets out the factors considered for a set of revised peak accommodation impacts predictions for an increased peak NHB workforce of 5090. It draws on a NHB spatial distribution analysis (Spatial Distribution Note [SDN] EDF 2022) that influences the potential impacts on the housing market. Relevant factors include the location of the existing workforce, the type of accommodation the workforce is staying in, the availability of accommodation and the likely makeup of the workforce. In summary, the prediction is for the increased workforce to continue to locate closer to the HPC site than was originally anticipated in the ES and DCO.

Table 5.1 sets out the revised predictions for housing tenure types, compared with those in the original DCO, informed by the 2021 Workforce Survey results. The 38% HB peak is the one adopted by EDFE. The distribution includes two important strategic interventions increasing the capacity of campuses and investment in caravan parks used by HPC workers—together totalling about 950 extra bedspaces The table also sets out the predicted PRS+Latent accommodation distribution for local areas in Somerset. The indicative geographical distribution of the PRS and latent workforce uses the 60-minute commuting zone as used in the previous HPC NHB workforce impact analysis.

Table 5.1: The revised predictions for housing tenure types, compared with those in the original DCO, informed by the 2021 Workforce Survey results (Source: EDFE Uplift Accommodation Topic Paper 2022)

		DCO (Peak)	Latest Survey (May 21)	Revised SDN (Peak) (38% HB)	Revised SDN (Peak) (34% HB)
Total Workforce		5,600	6,200	8,210	8,210
HB		1,900	1,980	3,120	2,790
NHB		3,700	4,220	5,090	5,420
NHB in Project Campus and Caravans		1,450	1,480	2,380	2,380
Residual NHB		2,240	2,740	2,710	3,040
Residual NHB in PRS or Latent		1,150	1,920	1,760	2,020
PRS + Latent	Bridgwater	250	1,410	1.090	1,250
	Burnham & Highbridge	100	60	50	70
	Cannington	50	80	230	260
	Cheddar	20	-	-	-
	Glastonbury	20	-	-	-
	Hinkley Point	10	100	90	90
	Minehead	50	10	-	-
	Somerset South	30	-	10	10
	Somerset West	10	-	-	-
	Taunton	250	250	230	270
	Watchet & Williton	70	10	40	50
	Weston-Super-Mare	290	10	20	20

Table 5.2: Predicted tenure distribution for NHB workforce at peak (38% HB workforce scenario) (Source: EDFE Uplift Accommodation Topic Paper 2022)

Accommodation type	**Predicted % of total at peak**	**Numbers**
PRS and Latent	38	1780
Campuses	39	1915[1]
Tourist etc	19	1135[2]
Owner Occupier	4	260
Total	100	5090

[1]Includes extra 480 bedspaces at the existing Campuses plus Pontins at Brean Sands (+800?). [2] Includes extra 470 Caravan Site bed spaces at Quantock Lakes (Nether Stowey), Moorhouse Farm (Holford) and Mill Farm (Fiddington).

5. 2. Monitoring Findings

Table 5.3: Monitoring data on Accommodation indicators/KPIs

<table>
<tr><th>Issues</th><th>Indicators/KPIs</th><th>Findings/Trends</th><th>Sources and Comments</th></tr>
<tr><td colspan="4">Workforce accommodation</td></tr>
<tr><td>Mix of accommodation tenure types in 60 min CDCZ at peak for NHB workers</td><td>% predicted distributions
<table><tr><th>Accom. type</th><th>Predict % of total at peak</th><th>Number</th></tr><tr><td>PRS and Latent</td><td>35</td><td>1780</td></tr><tr><td>Camp</td><td>38</td><td>1915</td></tr><tr><td>Tourist etc</td><td>22</td><td>1135</td></tr><tr><td>Owner Occup</td><td>5</td><td>260</td></tr><tr><td>Total</td><td>100</td><td>5090</td></tr><tr><td></td><td></td><td></td></tr></table></td><td>Actual for period 2021 to 2023
<table><tr><th>Accom. type</th><th>W/ 21</th><th>S/ 22</th><th>W/ 22</th><th>W/ 23</th></tr><tr><td>PRS and Latent</td><td>39</td><td>53</td><td>52</td><td>45</td></tr><tr><td>Camp</td><td>47</td><td>29</td><td>28</td><td>34</td></tr><tr><td>Tourist etc</td><td>10</td><td>14</td><td>15</td><td>14</td></tr><tr><td>Owner Occup.</td><td>4</td><td>4</td><td>4</td><td>6</td></tr><tr><td>Total</td><td>100</td><td>100</td><td>100</td><td>100</td></tr><tr><td></td><td></td><td></td><td></td><td></td></tr></table></td><td>Accom. Uplift 1 Paper -- allowing for 479 new campsite plots, plus Brean Sands Campus to take up to 900.</td></tr>
<tr><td>PRS (incl.Latent) accommodation by District and Ward Clusters</td><td>Predicted % distributions
<table><tr><th>Previous District</th><th>Nos</th><th>%</th></tr><tr><td>Sedgemoor</td><td>1320</td><td>74</td></tr><tr><td>W. Somerset</td><td>130</td><td>7</td></tr><tr><td>Taunton Deane</td><td>250</td><td>14</td></tr></table></td><td>Actual for period 2021 to 2024
<table><tr><th>Previous District</th><th>W/21 Nos</th><th>W/22 %</th><th>W/23</th><th>S/24</th></tr><tr><td>Sedgemoor</td><td>71 (1163)</td><td>69 (1925)</td><td>67 (2121)</td><td>66 (1847)</td></tr><tr><td>W. Somerset</td><td>6</td><td>9</td><td>6</td><td>5</td></tr><tr><td>Taunton Deane</td><td>17</td><td>17</td><td>22</td><td>21</td></tr></table></td><td>EDFE Uplift 1 Accom. Topic Paper, and SEAG and Workforce reports.</td></tr>
</table>

	North Somerset and Others	80	5		North Somerset and Others	6	5	5	8	
	Total	1780	100		Total	100	100	100	100	
	Of which in following ward clusters				Of which in following ward clusters					
	Bridgwater	1110	62		Bridgwater	1712	61	55	39	
	Taunton	240	14		Taunton	472	17	22	31	
	H. Point	80	4		H. Point	218	8	3	4	
	Cannington	230	13		Cannington	130	5	6	6	
	Others	120	7		Others	153	9	14	20	
	Total	1780	100		Total	2685	100	100	100	
Numbers and distribution by Districts of NHB workers with families										

District		S/23	W/23
Sedgemoor		46	59
Taunton Deane		34	29
W. Somerset		6	1
Others		14	11
Total		100	100

Numbers and distribution by Districts of HB workers	Predicted % distributions 1. From Council's 2012 Somerset only predictions; 2. From 2022 Uplift Spatial Distribution predictions		Actual % distribution 2021-2023	

Previous District	% 1	% 2
Sedgemoor	47	46
W. Somerset	9	8
Taunton Deane	16	12
Other SW and others	28	34
Total	100	

Previous District	W/21 %	W/22 %	W/23 %
Sedgemoor	42	44	41
W. Somerset	8	8	8
Taunton Deane	11	9	12
Other SW and others	39	39	39
Total	100	100	100
(Number)	(2384)	(2868)	(3574)

Local housing market impacts

Implementation of EDF local housing support strategy	Funding drawn down and bedspaces produced against targets, total site preparation s106 contributions (DCO funding) including Housing Contingency Funding) targets: -- Sedgemoor: c£2.7m -- SW&T :c£1.6m New bed spaces delivered in the PRS (Site Prep Funding) --Sedgemoor target: 1249 --West Somerset:250 New bed spaces delivered in the PRS (DCO funding including Housing Contingency Funding) -- Sedgemoor target:351	Cumulative total delivered by Q3/23: --Sedgemoor: c£2.6m --SW&T: c£1.3m Cumulative total delivered by Q3/23: --S : 1406 --WS: 360 Cumulative total delivered Q3/23: --S: 912 --WS&T: 462	SEAG Accom. Dashboard

	-- West Somerset & Taunton: 510 -- N. Somerset:359 Overall additional bedspaces anticipated at peak: now 3900 (1000 estimated at peak in original accommodation strategy)	--NS: 718	
Impacts on local vulnerable groups	Trends in homeless acceptances Households in temporary accommodation	Households assessed as homeless per 1,000 households has grown by 4 households per 1,000 between 2018/19 and 2020/21 in Sedgemoor compared to 2 per 1,000 nationally Sedgemoor: 19/20 – 2433 20/21 – 2731 21/22 – 2227	Accom. Uplift Paper (EDFE 2022) DLUHC
Impacts on local house prices		Based on lower quartile house prices divided by residence-based earnings, the affordability gap has been getting wider, proportionately, at local and national scales, but Sedgemoor and Somerset West and Taunton remain more affordable than the national and regional average. The Sedgemoor ratio has increased from c8 to c9 over the construction period to date.	Accom. Uplift Paper (EDFE 2022)
Growth in number and % share of housing as HMOs		Actual HMOs as % of all dwellings in Sedgemoor DC area increased from 0.03 to 0.25 over 2012 to 2019 period.	Ditto
Impact on local multiple deprivation Issues (Housing)		% of Somerset LSOAs in 20% most deprived in England for *Barriers to Housing and Services** increased from 22% to 25.7 % between 2015 and 2019 -- but all of Somerset and before peak. *(*measures the physical and financial accessibility of housing and local services)*	Somerset Intelligence English Indices of Deprivation (2019 Somerset Summary)

5. 3. Auditing of Findings

Table 5.4: Audit of actual against predicted Accommodation impacts.

Impact Issue Indicator	Commentary on actual vs predicted impacts Commentary on performance in relation to objectives and targets (as available)	Summary RAG colour coding
Workforce accommodation		
Geographical distribution of non-home based workers (NHB)	Original predictions by both EDFE and the Councils for the distribution of the NHB workforce were for a concentration in Sedgemoor, partly reflecting the location of the large Bridgwater Campus in the District. Recent findings reinforce these predictions; indeed the concentration appears greater than anticipated, probably largely because of the reluctance of NHB workers to commute daily from outside the local districts. The current findings for	LG

	Somerset West and Taunton Deane are very much in line with original predictions.	
Numbers and distribution by Districts of home-based (HB) workers	Peak findings are similar within Somerset to the original default Council predictions, and Uplift Spatial Distribution estimates. However, the growth outside the 90-minute commute area has been noted as a possible result of post Covid working patterns, with those who in the past might have been on site 4-5 days a week may now only be once or twice a week. It may also reflect the shift in skills requirements for the MEH stage of construction. At c20% of the workforce, this is considerably above that anticipated with the original DCO assessment.	LG / A
Mix of accommodation tenure type in 60 min CDCZ at peak for NHB workers	The mix of housing tenure for NHB workers in Summer 23 was skewed much more towards PRS (including latent, which is seen as closest in type to PRS) than in latest uplift predictions. The combined campus and tourist (hotels, B&B, camping/caravans etc) accommodation was around 50% rather than the predicted 60% of the total. This may partly reflect the fact that the planned additional bedspace and camping sites provision numbers have not yet all had an impact, although the recent impact of the new Brean Sands Campus has significantly increased the % share of campus accommodation.	A
Trends in accommodation tenure type in 60 min CDCZ at peak	The full opening and occupancy of the Bridgwater Campus increased the % workforce in the then two campuses to almost 50% of NHB workers in Winter 21, but with the continuing growth in workforce and the campuses at capacity this proportion fell back and PRS again dominated the tenure mix by Winter 22. However, the recent addition of the Brean Sands Campus has now reversed this trend.	LG
PRS (incl.Latent) accommodation by District and Ward Clusters	The distribution of the important and sensitive PRS (including latent accommodation) by ward cluster is reasonably close to predictions in the uplift papers for Bridgwater and Taunton. The numbers for Cannington are much lower than predicted.	LG
Numbers and distribution by Districts of NHB workers with families	The numbers and distribution are roughly in line with original predictions, being somewhat less concentrated in Sedgemoor than the workforce as a whole	LG
Local housing market impacts		
Implementation of EDFE local housing support strategy	Data on the drawdown of funding support from the EDFE local housing support strategy, and the resultant delivery of bedspaces, especially in Sedgemoor, West Somerset /Taunton Deane and North Somerset, indicate continuing effective implementation of the strategy in delivering a substantial number of extra bedspaces. Although it is not possible to know whether all the successfully developed bed spaces are still available and utilised.	DG
Impacts on local vulnerable groups and on house prices	There is a range of relative data from national and local authority sources covering impacts on vulnerable groups. For example, there has been a small drop in the number of households on waiting lists in Sedgemoor between 20/21 and 21/22. This partly reflects the success of EDFE housing strategy and local authority partnership initiatives. The housing affordability gap has been getting wider, proportionately, at local and national scales, but Sedgemoor and Somerset West and Taunton remain more affordable than the national and regional average. The Sedgemoor ratio has increased from c8 to c9 over the construction period to date.	LG
Growth in number and % share of housing as HMOs	There has been a substantial increase in the HMO %, especially for Sedgemoor, but figures are still a little below SW and England levels.	A

Impact on local multiple deprivation Issues (housing)	Some small deterioration in relative position of Somerset nationally re incidence of deprivation, including small deterioration in barriers for housing and services. However— data is for whole of Somerset and only up to 2019 (i.e not peak).	A	B

6. Refresh RAG Indicator Ratings: Social and Community

6. 1. Context: Strategic Issues and Indicator Update

The social and community impacts sector includes peak construction impacts on a range of essential local services, people and communities and on managing those impacts. These impacts include those on health, crime and safety, other emergency services, education and wellbeing. Many of the impacts flow directly from the extent and accommodation distribution of the HPC NHB workforce in the community including their family make-up (e.g. accompanied with partner, children). Key original references to these issues, as set out in detail in the 2019 HPC Study 1 report, include various documents from 2011/12, in particular a Health Action Plan, Community Safety Management Plan and the S106 Agreement. In response to the workforce uplift proposals and also in light of the COVID pandemic, health and community safety issues were reviewed in two uplift topic papers – Health Topic Paper (EDFE 2022) and Community Safety (EDFE 2022).

The Health Topic Paper reviewed the nature of the larger workforce, possible additional impacts and appropriate mitigations. It concluded that Workforce Survey evidence to date showed no particular shift in the make-up of the workforce (i.e largely homogenous, being majority male, 35-49 years of age, and of white ethnic origin), and that any health impacts could be well managed via Hinkley Health, the on-site health facility. Indeed, the response to the impacts of the COVID pandemic showed the ability of Hinkley Health to flex very effectively to manage an extreme situation.

The Community Safety Topic Paper considered potential impacts of the workforce uplift on issues including crime and disorder, the nighttime economy, equality within the community and on existing mitigation measures. Detailed evidence traced impacts through to 2021 and set out the range of mitigation measures, including the Workforce Code of Conduct and various funding support for local services. The most common cause of local complaints, not anticipated in the original ES and DCO, fly parking, is covered here and in the transport sector review. The uplift topic paper concludes with a number of recommendations for enhanced mitigation funding and some amendments to the Community Safety Management Plan.

Monitoring data on health and community safety issues is reported on a regular basis by EDFE to SEAG; the Sedgemoor Annual Monitoring Report and Somerset Intelligence are other valuable sources. Other topic specific sources include Somerset CCG and SW Public Health for local health and hospital services; and Health Task and Finish Group (HTFG), Avon and Somerset Constabulary and local authorities for crime and fear of crime. Contextual baseline information is available from national sources, such as ONS Annual Population Survey for personal wellbeing, and the Index of Multiple Deprivation on trends in relevant domains. Most of the original indicators/KPIs will continue as the default position where there is no indication of revision of targets

6. 2. Monitoring Findings

Table 6.1: Monitoring data on Social and Community indicators/KPIs

<table>
<tr><th>Issues</th><th>Indicators/KPIs</th><th>Findings/Trends</th><th>Sources and Comments</th></tr>
<tr><td>Changing nature of NHB workforce – including family composition – implications for services</td><td>DCO predicted number of NHB family members at peak construction as 500 workers with their families, resulting in additional 600 non-worker adults, 300 school age children and 65 pre-school children moving into the area.</td><td>Summer 23 data indicates 691 workers with families, and 700 non-workers adults, 427 school age children and 231 pre-school children moving into the area.

Winter 23 data indicates 854 workers with families, and 911 non-workers adults, 524 school age children and 268 pre-school children moving into the area.</td><td>SEAG – Workforce Survey</td></tr>
<tr><td colspan="4">Health and wellbeing</td></tr>
<tr><td>Pressure on NHS--NHB HPC worker referral to local GPs and hospitals</td><td>Numbers referred</td><td><table><tr><td></td><td></td><td>Q4 /21</td><td>Q4 /22</td><td>All 23</td></tr><tr><td>GPs</td><td></td><td>0</td><td>0</td><td>0</td></tr><tr><td>Hosp.</td><td></td><td>30</td><td>59</td><td>233</td></tr></table></td><td>SEAG</td></tr>
<tr><td>Mitigation provision--health staff in on-site medical centre</td><td>Number of staff and range of skills</td><td>About 30 FTE staff during 2022 (c19 FTE in 2018); wide range of skills, (including 15 nurses, and approval to increase to 20). About 35 FTE staff in 2023.</td><td>SEAG</td></tr>
<tr><td>The number of drug and alcohol checks completed across all staff.</td><td>Numbers completed In Q/Yr.</td><td><table><tr><td>Q4 /21</td><td>Q4 /22</td><td>Q4/ 23</td></tr><tr><td>3305</td><td>5249</td><td>4806</td></tr></table></td><td>SEAG</td></tr>
<tr><td>The number of call-outs made to the SW Ambulance Service NHS Foundation Trust.</td><td>Number of callouts — cumulative for year</td><td><table><tr><td>2021</td><td>2202</td><td>2023</td></tr><tr><td>38</td><td>73</td><td>58</td></tr></table>(c50 in 2018)</td><td>SEAG</td></tr>
<tr><td>HTFG –e.g. mental health open referrals; sexual health referrals</td><td>Comparison of numbers and trends in Hinkley Zone and in Somerset</td><td>Examples of HTFG data –2022

• Hate crime in the Hinkley Zone remains lower than at peaks seen during 2021.
• Numbers of sexual assaults have stabilised in the Hinkley Zone, although there are declines in the rest of the county.
• Offences where victims were women and offences where victims were children have declined for the second successive quarter in the Hinkley Zone but have been generally stable over the last two years.</td><td>HTFG Somerset Partnership: Supplementary Data 2023</td></tr>
<tr><td colspan="4"></td></tr>
</table>

<table>
<tr><td colspan="4">Community safety</td></tr>
<tr><td>Reported crime linked directly to HPC</td><td>Trends in cumulative numbers, and by Quarter (Q)

Trends in Annual Crime Numbers</td><td><table><tr><td></td><td>Q1/22</td><td>Q3/22</td><td>Q4/24</td></tr><tr><td>Q</td><td>82</td><td>96</td><td>100</td></tr><tr><td>Cum</td><td>908</td><td>1169</td><td>1651</td></tr></table>
<table><tr><td>Year</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td></tr><tr><td>Nos</td><td>160</td><td>192</td><td>278</td><td>382</td></tr></table></td><td>SEAG - Q1 here is April to June; Q3 is Oct to Dec; Q4 is Jan –Mar.</td></tr>
<tr><td>Non-reported criminal activity linked directly to HPC</td><td>Trends in cumulative numbers</td><td><table><tr><td></td><td>Q1/2</td><td>Q3/22</td><td>Q4/24</td></tr><tr><td>Q</td><td>95</td><td>79</td><td>103</td></tr><tr><td>Cum</td><td>1056</td><td>1340</td><td>1965</td></tr></table></td><td>SEAG</td></tr>
<tr><td>Annual fear of crime index – SDC</td><td>% SDC residents feeling very safe or safe in own home during the day</td><td>2017- 94
2021- 92</td><td>SDC Community Safety Report 2021</td></tr>
<tr><td>Numbers of criminal offences and abuse</td><td>Comparison of data in Hinkley Zone (HZ) and Somerset (S) -- using examples of hate crimes and sexual assaults</td><td><table><tr><td></td><td></td><td>Hate Crimes</td><td>Sexual Assaults</td></tr><tr><td>HZ</td><td>Dec 2016</td><td>30</td><td>13</td></tr><tr><td>S</td><td>Ditto</td><td>102</td><td>101</td></tr><tr><td>HZ</td><td>Dec 2022</td><td>41</td><td>30</td></tr><tr><td>S</td><td>Ditto</td><td>206</td><td>128</td></tr></table></td><td>HTFG Somerset Partnership: Supplementary Data 2023</td></tr>
<tr><td>Location specific –especially re night time economy</td><td>Reported crime data for e.g Bridgewater Town Centre</td><td>June 22 - 209
Dec 22 – 151
April 23 – 174

Percentage of violence and sexual offences (at c35%) and anti-social behaviour offences (at c20%) have remained consistent over last 3 yrs.

Bridgwater as a whole has a much higher crime rate than Somerset (2022 –was 131/1000 pop compared with 65/1000 for Somerset).</td><td>Police UK data—all reported crimes</td></tr>
<tr><td>Location specific –especially re fly parking</td><td>Reported complaints to EDF</td><td>Q3/22-- 119
Q4/22—159
Q3/23 – 142
Q2/24 -- 266
EDFE Parking Patrollers mitigation but continuing problem although many offenders are not HPC.</td><td>TRG Quarterly Reports; Stakeholder Relations Reports</td></tr>
<tr><td>Impact on other emergency services</td><td>Number of incidents of fire directly related to HPC</td><td>Nine in 2022 with cumulative 38 by end of that year.</td><td></td></tr>
<tr><td colspan="4">Education</td></tr>
<tr><td>Impact on local schools capacities –from NHB with families</td><td>Spatial distribution of NHB families in Somerset</td><td>No data on distribution of NHB workforce families with school age children</td><td></td></tr>
</table>

Community welfare			
Impact on community cohesion and local quality of life; feeling of community wellbeing –from extended construction period, especially for communities close to site.	Wellbeing indicators; Incidence of complaints;	Level of complaints remains low over period 2019 to 2023 –with the exception of fly parking. Very low for worker behaviour. For SDC – a very small dip in reported personal wellbeing from 7.7/10 in 2016/17 to 7.6/10 in 2021/22. Stogursey had 7 reported crimes in March 23, which was very similar to early construction period figures.	EDF Complaints Register ONS Annual Population Survey – personal wellbeing at LA level
Impact on community cohesion and local quality of life –via use of Community Impacts Mitigation (CIM) funding	Use of CIM fund	20/21 open funding of c£500, 000 for 10 larger projects (at c £50000 per project) and c£140,000 for c40 projects at c£3500 per project. New grants totalling £2.6m made to 57 organisations in 22/23.2.Mix of projects across various age groups in the local community. In total, over £15m of the £20m CIM fund is now allocated.	EDF HPC Community Fund – Annual Reports 2021/22, 2022/23.
Changes in local performance in relative deprivation domains of Index of Multiple deprivation (IMD) –e.g. health; education skills and training; crime; living environment	Trends in IMD between 2015 and 2019	Sedgemoor was the worst performing Somerset district with an index of 121 out of 317 nationally. It scores lower than other Somerset districts on all domains, with the exception of *Barriers to Housing and Services* where it scores better than all local districts with an index of 176. Of 25 Somerset LSOAs that became more deprived between 2015 and 2019, 5 were in Sedgemoor and 8 were in West Somerset and Taunton Deane. All this however is pre-peak construction.	Somerset Intelligence: IMD 2019 Summary

6. 3. Auditing of Findings

Table 6.2: Audit of actual against predicted Social and Community impacts.

Impact Indicator Issue	Commentary on actual vs predicted impacts Commentary on performance in relation to objectives and targets (as available)	Summary RAG colour coding
Changing nature of NHB workforce – including family composition – implications for services	A 70% increase in the new peak workforce has to date been accompanied by an approx. 40% increase above the DCO predicted proportion of those NHB workers with families, bringing with them an approx.10% increase above the DCO predicted proportion of family members. The most significant difference is in the substantially higher number of pre-school children. Overall, the NHB family accompanied workforce is proportionately less for peak construction than that anticipated if the original DCO % rates had prevailed for the uplifted workforce numbers.	A
Health and wellbeing		

Pressure on NHS—with potential NHB HPC worker referral to local GPs and hospitals	Impacts of the increasing workforce on the NHS appears very limited, continuing the trends established in early construction. Impacts on local GP services appear negligible and local hospital referrals average about 10-20 per month. As examples of potential particular health issues HTFP data shows no significant rise in mental health open referrals and sexual health referrals in the Hinkley Zone compared with Somerset as a whole.	DG
Mitigation provision--health staff in on-site medical centre (Hinkley Health); Workforce health checks	The provision of the bespoke Hinkley Health (HH) facility continues to be the major asset in minimising workforce impacts on local health facilities. Medical staffing has grown, from approx 20 to 35 FTE (2018-2023) to handle the demands of the larger workforce, although no dental provision. HH facility also used by some HB workforce, thus taking some pressure off local GPs. Other mitigation and health enhancement measures, such as drug and alcohol checks completed across all staff, and health-screening sessions, continue at a good level.	DG
The number of call-outs made to ambulance and fire emergency services.	The number of ambulance callouts has not changed much since 2018 when the workforce was much lower, and is quite low for such a major project. There is a similar continuation of low figures of instances of fires linked to HPC construction.	DG
Community Safety		
Impact on local policing: changes in reported and non-reported level of crime linked directly to HPC	Anticipated impact areas were the behaviour of a predominantly male workforce, with a concern of anti-social behaviour and increased levels of various types of crime. However, data reported to SEAG on crime linked directly to HPC show no major changes, relative to workforce numbers, on the outcomes for early construction.	DG
Numbers and types of criminal offences and abuse	Hate crime in Hinkley Zone is relatively low and has increased less over 2016-2022 period than for Somerset as a whole. Numbers of sexual assaults have stabilised in the Hinkley Zone, although there have been declines in the rest of the county.	LG
Fear of crime	Small decline in SDC safety feeling, but still very positive—even with major increase in project numbers	DG
Location specific – especially re night time economy	Data show no major growth in reported crimes for Bridgwater Town Centre or in percentage types of crime over last three years, although Bridgwater as a whole has a much higher crime rate than Somerset.	LG
Location specific – especially re fly parking	Fly parking is the most significant area of complaint by community. EDFE seek to mitigate in various ways, including system of Parking Patrollers and through Code of Conduct. Complaints are not always easy to validate and do include many related to non-HPC workforce. Overall, HPC related offences are falling a little even with increase to peak workforce.	R
Education		
Impact on local schools capacities –from NHB with families	As for our 2019 report, there is a problem re monitoring data. EDFE has made upfront payments for additional school space capacity in areas of Somerset where there was an expectation of limited pre-school and/or primary school capacity. This includes a new primary school at Northgate in Bridgwater that also provides pre-school places. Schoolchildren numbers are now (2023-24) becoming much higher than the original DCO predictions, at almost double for school age children and four	A

	times higher for pre-school. As such, the EDFE funded/Somerset mitigation provision may not be adequate, depending on family distribution.	
Community welfare		
Impact on community cohesion and local quality of life; feeling of community wellbeing –from extended construction period	Levels of complaints remain low, with the exception of fly –parking (discussed in Transport sector). National wellbeing data are in line with those for early construction, with only a very small shift downwards for Sedgemoor. Stogursey had 7 reported crimes in March 23, which was very similar to early construction period figures.	LG
Impact on community cohesion and local quality of life – Community Impacts Mitigation fund	Community Impacts Mitigation funding is providing initiatives of facilities and services to help to improve the social, economic, and environmental wellbeing of communities affected by the HPC construction. Over £15m of the £20m fund is now committed. Recent allocations on open and small projects are very much in line with earlier funding.	DG
Changes in local performance in relative deprivation domains of Index of Multiple deprivation (IMD) –e.g. health; education skills and training; crime; living environment	There have been some small negative shifts in relative deprivation for parts of Sedgemoor and West Somerset and Taunton Deane between 2015 and 2019, although Sedgemoor has improved in the important domain of *Barriers to Housing and Services*. However, this period precedes peak construction by several years and it is difficult to draw any firm conclusions on the relative impacts of HPC peak construction.	A / B

7. Refresh RAG Indicator Ratings: Transport Sector

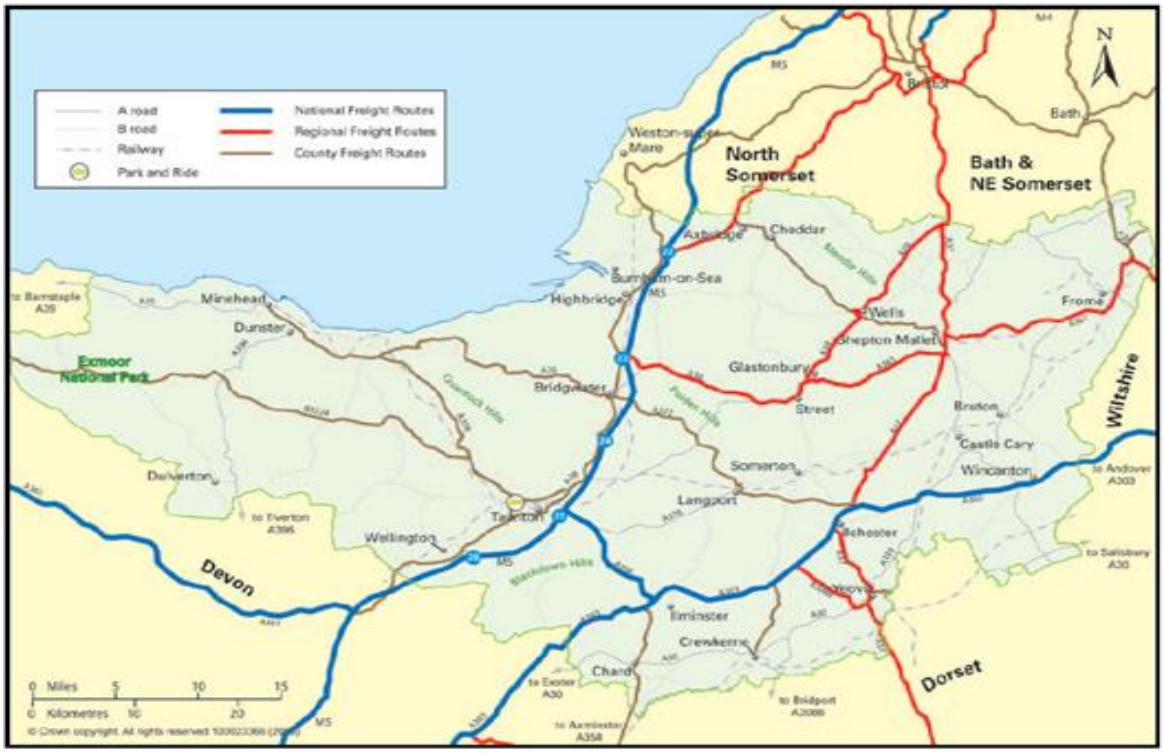
7.1 Context: Strategic Issues and Indicator Update

The report draws on a range of sources. The 2019 HPC Study 1 on the impacts of early stage construction sets out the sources of key indicators/KPIs. This new peak construction report updates these with information from papers prepared for the 2021-22 Transport Uplift Study (EDFE Jan 2022). Other key sources of monitoring information are the various reports of SEAG and TRG, supplemented where available by information from the various community fora and from local authority data.

The HPC Workforce Uplift – Update Transport Topic Paper (EDFE 2022) sets out some revised objectives and targets for overall peak employment (then averaging 8600 over peak period, with c 38% HB recruitment). To understand the likely transport impacts of the workforce uplift, there is a review and comparison of a revised peak workforce number of 8,600 against the original DCO Environmental Statement (ES) (Volume 2, Chap10 EDF 2011), the Transport Assessment (TA) and Construction Workforce Travel Plan (CWTP). These assessed a peak construction workforce of 5,600 and included appropriate mitigation measures to address associated impacts.

This update of the transport sector identifies any likely adverse or beneficial transport impacts and effects arising from the workforce uplift. It identifies existing mitigation measures implemented in response to the DCO, and, if any there are likely adverse effects resulting from the workforce uplift, which are over and above those identified within the DCO application, additional mitigation are suggested. A range of additional data was agreed as part of Workforce Uplift 1 and is now reported in the TRG quarterly report - e.g. parking accumulation and some bus data. However, many of the original indicators/KPIs will continue as the default position where there is no indication of revision of targets. Similarly, the Transport Uplift Topic Paper uses the same spatial base, distinguishing between the local Construction Development Commuting Zone (CDCZ), which represents the 90-min maximum commuting zone of local HB workers. NHB workers originate from outside this zone, although they will almost wholly live within this zone, and largely within a 60-min commute zone, during the duration of their time on the project. Figure 7.1 shows the national, regional and county freight routes within Somerset.

Figure 7.1: National, regional and county freight routes within Somerset



EDFE committed to the key elements set out in the Somerset Local Transport Plan on freight management that wherever possible HGVs should use the Strategic Road Network (SRN); and possible HGVs will adhere to the National Regional and County Freight Routes set out in Figure 7.1. Two HGV routes (Figure 7.2) were proposed and adopted from J23 and J24 of the M5 motorway to the HPC site during the construction stage.

In order to meet with Workforce Transport Objectives set out in the TA, a strategy was developed for work trips to and from the HPC site. Crucial to the management of the traffic effects of the construction of HPC are a set of mitigation measures developed between EDFE and key local, regional and

national stakeholders, in discussions and consultations leading up to the submission of the developer's draft DCO and accompanying the ES, and in the formal examination of the project. These are set out in Figure 7.3

Figure 7.2: Designated HGV Routes to HPC

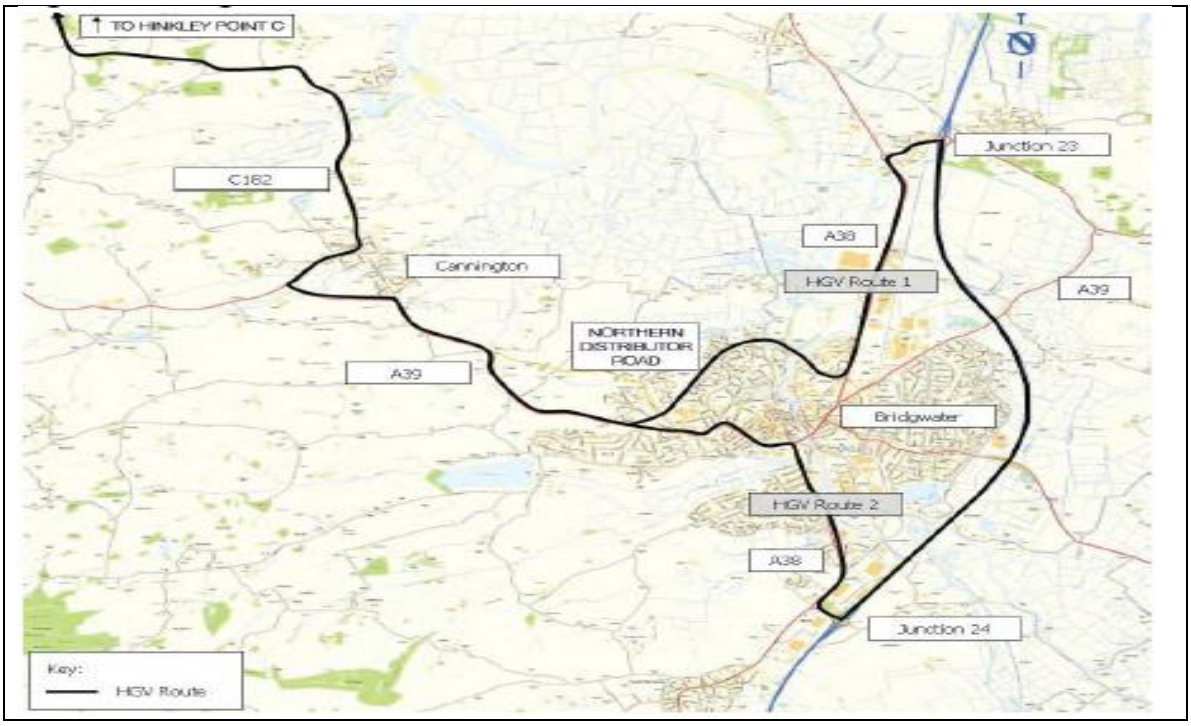
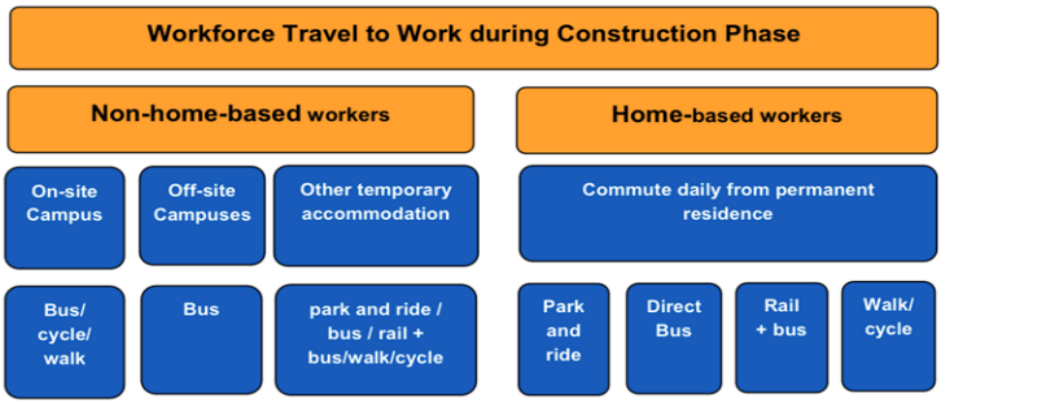


Figure 7.3: Workforce Travel to Work Mechanisms

Figure 5.1: Travel to Work Mechanism for Workforce



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7.2 Monitoring Findings

Key sources of transport sector monitoring information are the TRG quarterly reports. As part of the DCO, the developer must implement and monitor the implementation of the Construction Workforce Travel Plan (CWTP) and the (CTMP) until the end of construction. These plans include various limits and targets, including for example on mode share targets for worker travel to the site, HGV deliveries to site against maximum daily limits and details of any breaches. Recent performance against targets and limits are set out in Table 7.1.

Table 7.1: Monitoring data on Transport indicators/KPIs

<table>
<tr><th>Issue</th><th>Indicators/KPIs</th><th>Findings/Trends</th><th>Sources of data</th></tr>
<tr><td colspan="4">People movements</td></tr>
<tr><td>HPC site journey to work</td><td>Mode share targets, eg: bus (87%), walk (9%), and car (4%)</td><td>
<table>
<tr><td>For Q2/%</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr>
<tr><td>Bus</td><td>75</td><td>84</td><td>86</td><td>87</td><td>90</td></tr>
<tr><td>Walk</td><td>17</td><td>10</td><td>9</td><td>10</td><td>5</td></tr>
<tr><td>Car</td><td>7</td><td>4</td><td>4</td><td>3</td><td>3</td></tr>
<tr><td>Cycle</td><td>1</td><td>1</td><td>0</td><td>0</td><td>1</td></tr>
<tr><td>M/Bike.</td><td>1</td><td>1</td><td>1</td><td>1</td><td>1</td></tr>
</table>
</td><td>All TRG, except where indicated</td></tr>
<tr><td>Travel to and from Associated Development (AD) Sites: J23, J24, Cannington, Williton, and Morrison’s</td><td>Mode share targets, eg for J23
Sustainable – 4%
Car driver – 58%
Car passenger – 38%

eg for J24
Sustainable – 4%
Car driver – 60%
Car passenger – 36%</td><td>
<table>
<tr><td>For J23 Q2 %</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr>
<tr><td>Sus</td><td>3</td><td>0</td><td>1</td><td>1</td><td>1</td></tr>
<tr><td>Driver</td><td>75</td><td>81</td><td>82</td><td>80</td><td>84</td></tr>
<tr><td>Pass.</td><td>22</td><td>19</td><td>17</td><td>19</td><td>15</td></tr>
<tr><td>For J24 Q2%</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Sus</td><td>5</td><td>18</td><td>13</td><td>23</td><td>20</td></tr>
<tr><td>Driver</td><td>71</td><td>69</td><td>73</td><td>64</td><td>66</td></tr>
<tr><td>Pass.</td><td>24</td><td>13</td><td>14</td><td>13</td><td>14</td></tr>
</table>
</td><td></td></tr>
</table>

<table>
<tr><td></td><td></td><td>NB: the proportion of car drivers and car passengers for J24 is affected by the fact that many local workers now walk to the P&R site because of the introduction of an expanded distance by which workers are expected to walk to collect a bus.</td><td></td></tr>
<tr><td>Number of passengers using bus service to HPC Site</td><td>Not specified -- but see mode share target above</td><td>Dec 2018 – 1993
Sept 2023 -- 8521
June 2024 – 9809</td><td></td></tr>
<tr><td>Location specific – especially re fly parking</td><td>Reported complaints to EDF</td><td><table><tr><td>Q2 Nos</td><td>2018</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr><tr><td></td><td>165</td><td>26</td><td>15</td><td>247</td><td>405</td><td>266</td></tr></table>EDFE Parking Patrollers mitigation but continuing problem. Covid influenced 2020 and 2021 figures.</td><td></td></tr>
<tr><td colspan="4">Freight movements</td></tr>
<tr><td>DMS bookings v HPC construction works HGV (Limits)</td><td>Target max
• Mon-Fri: 750
• Sat: 375
• Qrtly Av: 500
• HGV Route 1: 450
• HGV Route 2: 300</td><td><table><tr><td>For Q2 targets</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr><tr><td>750</td><td>230</td><td>320</td><td>294</td><td>243</td><td>252</td></tr><tr><td>375</td><td>23</td><td>102</td><td>68</td><td>34</td><td>18</td></tr><tr><td>500</td><td>136</td><td>201</td><td>181</td><td>139</td><td>154</td></tr><tr><td>For HGV routes</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>1—J23 450</td><td>188</td><td>241</td><td>207</td><td>187</td><td>177</td></tr><tr><td>2—J24 300</td><td>72</td><td>120</td><td>114</td><td>71</td><td>84</td></tr></table></td><td></td></tr>
<tr><td>Abnormal Indivisible Loads (monthly and quarterly)</td><td>No limit specified</td><td><table><tr><td>Q2 Nos</td><td>2020</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr><tr><td></td><td>213</td><td>329</td><td>255</td><td>203</td><td>312</td></tr></table></td><td></td></tr>
<tr><td>Temporary Jetty</td><td>Operational in Sept 2019. Target to deliver minimum of 80% by weight of materials for on-site concrete.</td><td><table><tr><td>Materials delivered</td><td>Sept 19-Aug 20</td><td>Sept 22-Aug 23</td><td>Sept 19-Aug 23</td></tr><tr><td>via Road</td><td>37.3</td><td>37.4</td><td>37.2</td></tr><tr><td>via Jetty</td><td>62.7</td><td>62.6</td><td>62.8</td></tr></table></td><td></td></tr>
</table>

7.3. Auditing of Findings

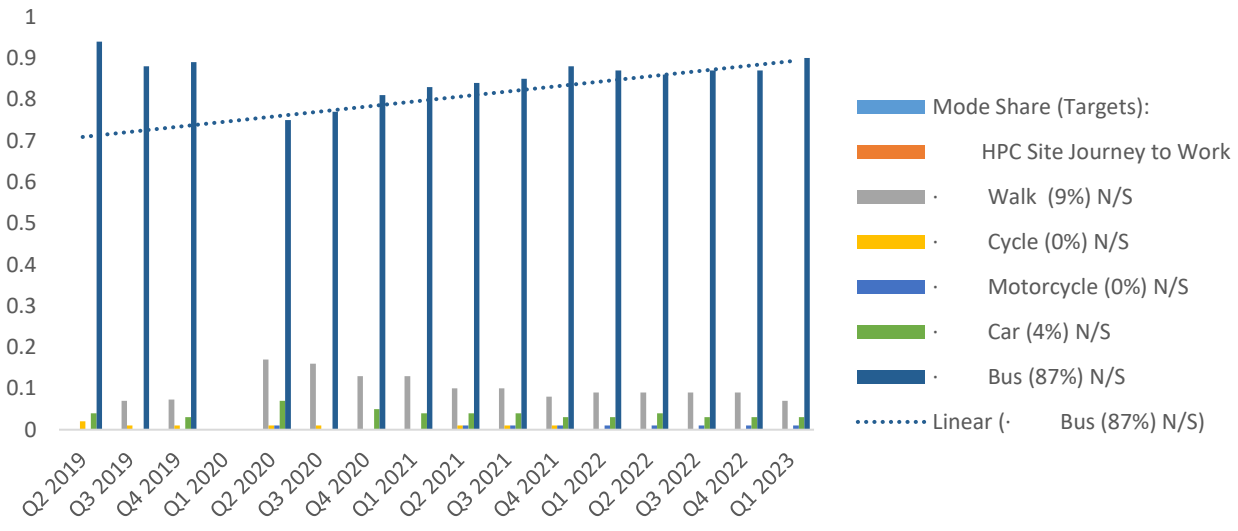
In addition to comments on each impact issue indicator, we have applied a very simple colour code audit (RAG system) as used in the 2019 HPC Study 1 report, ranging from Dark Green (very accurate/compliant), through Amber to Dark Red (very inaccurate/non-compliant). A blue colour coding indicates No Information Available yet.

Table 7.2: Audit of actual against predicted Transport impacts.

Workforce movements

Impact sector	Commentary on actual vs predicted impacts Commentary on performance in relation to objectives and targets (as available)	Summary RAG colour coding
HPC site journey to work	HPC Site Journey to Work Mode share Bus has a target of 87%. Q2-Q4 2019 easily exceeded 87%. This dipped at the beginning of Covid lockdown, in Q1 2020, but recovered well with a definite rising trajectory (see Figure 7.4). This, coupled with the use of walking, is very positive. It is important to recognise changes to the bus strategy and routing to reflect worker locations and ensure that the direct bus service is maximised to minimise the number of workers travelling to a P&R location. The use of an 800m+ rule and introduction of walk and ride are other significant changes. NB: Recent reduction in walking is due to numerical proportions of main site campus workers v overall increase in worker numbers and resultant increase in actual bus numbers.	G
Travel to and from AD Sites: J23, J24, Cannington, Williton	A continuing issue with high proportion of car drivers. Recent more long distant commuting by HB workforce in the MEH stage places some constraints on the car sharing percentage. There is a continuing and considerable promotion of HPC Car Share to meet the car share targets at project peak. Driver percentage for J24 is affected by increase in walking to P&R.	O
Fly parking complaints	Fly parking by HPC workers is a continuing and locally very significant transport impact issue. Complaints about fly parking far outweigh all HPC transport (including HPC Bus Service, HGV speeds and roadworks) and other complaints. Non-HPC workers are also fly parkers and the distinction with HPC workers may not always be locally recognised. In Q2 2017 a three-step approach to tackling fly parking associated with using the HPC bus service was approved by the HPC Site Director and has been communicated to the Tier 1's. There is a three-step approach following a community complaint or HPC monitoring team identifying a fly-parking vehicle that is on the HPC Transport database. By step 3 NNB expect disciplinary action through Tier 1's (ultimately, if no action, HPC Site Pass withdrawn). There has been a more concerted effort over the last year or so with a refresh of the policy and many more incidences of formal warnings and withdrawal of site passes.	R

Figure 7.4: HPC Site - Journey to Work



Freight movements

Impact sector	*Commentary on actual vs predicted impacts*	*Summary RAG colour coding*
Delivery Management Strategy (DMS) actuals v construction works HGV targets – HGV FMF/local	Monitoring and reporting show a consistently good compliance with the three criteria caps: Mon-Fri (750), Saturday (375) and Quarterly Average (500). The DMS is working well using a GPS based model. NB: HGV movements were scoped out of the Transport Uplift Assessment (2022) due to: • HGVs are already restricted to travelling outside of the peak- workforce travel times; therefore, they will not coincide with any change in workforce travel patterns. • HGV movements managed, controlled and reported through the CTMP and TRG in line with the current agreed conditions and practices. • No material change in HGV movements proposed associated with the workforce uplift.	G
HGV breaches of construction works (monitored but no targets set)	Breaches in terms of HGV limits, timing restrictions, routing violation have increased a little over time from initially very low single figures to figures averaging about 30 per quarter. However, this is still very low and less than 1% (0.23%) of total HGV movements (11,523) during Q2 2024. Low numbers reflect positive action by EDFE on driver induction and training. All HGV drivers who were involved in breaches receive a Driver Strike.	LG
Materials delivered by Jetty	The 80% target has proved challenging -- but the provision of the Jetty in Sept 2019 has helped to take a large proportion of materials off the road. Much is dependent on tides.	A
Abnormal Invisible loads	Has remained consistent in 200-300 range over build up to peak construction period.	LG

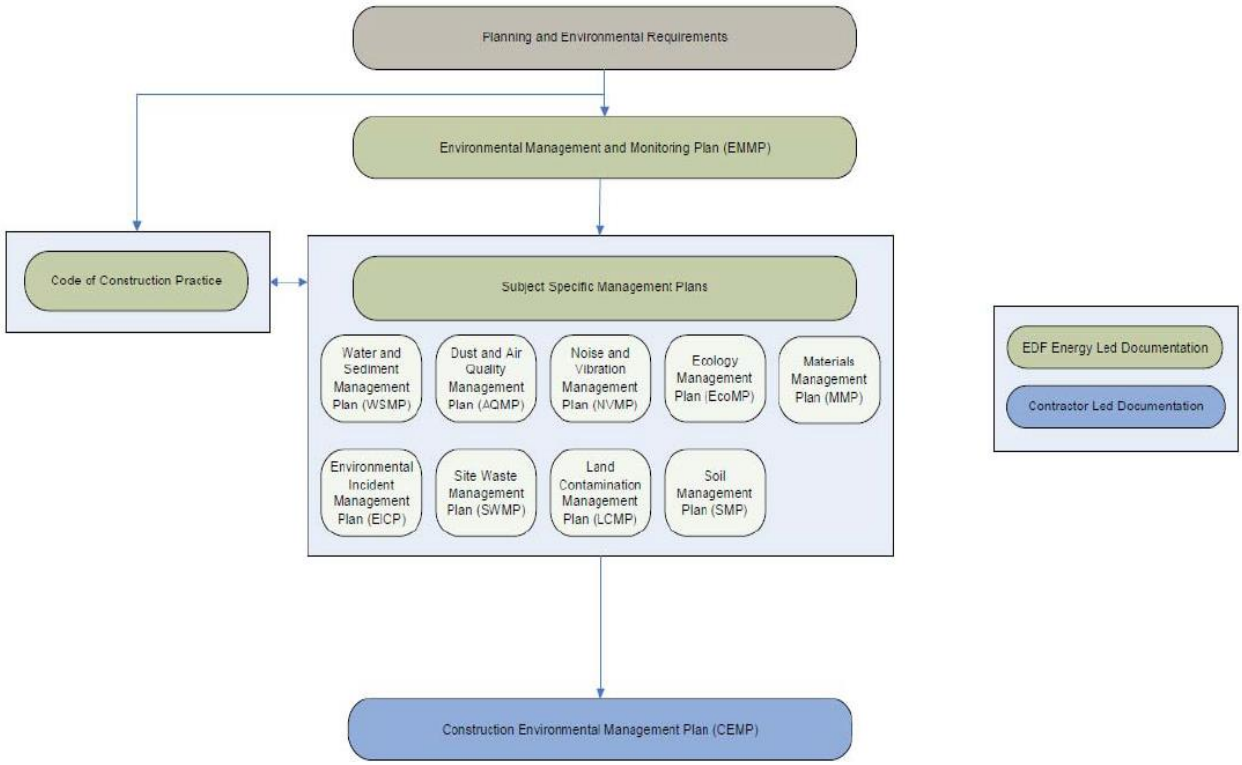
8. Refresh RAG Indicator Ratings: Biophysical and Environmental Health Impacts

8.1 Context: Strategic Issues and Indicator Update

Biophysical and Environmental Health issues are largely addressed by an Environmental Management and Monitoring Plan (EMMP) that was developed to cover the HPC Main Site and Associated Developments (Figure 8.1), including for example impacts of the development on local water quality, air quality, noise, and waste. The EMMP also includes an Ecology Management Plan (EcoMP). In the 2019 HPC Study 1 Report Biophysical and Environmental Health impacts were in separate sections. In this new study, the Biophysical and the Environmental Health impacts of the development on the local area (eg. noise, waste) are taken together. Other Environmental Health impacts, of the workforce on local health services and on the local population, are in the Social and Community section (see Section 6).

Figure 8.1: Environmental Management and Monitoring Plan

Figure 1.1 Environmental Management System Documentation



The report draws on a range of sources. The 2019 HPC Study 1 on the impacts of early stage construction sets out the sources of key indicators/KPIs. This new peak construction report updates these with information from papers prepared for the 2021-22 Biophysical Environment and Environmental Health Uplift Studies (EDFE 2022) and other data. Additional qualitative information comes from reviewing the minutes from HPC Environmental Monitoring quarterly reports 2022-2023, HPC Forum meetings and local parish council meetings. Other key sources of monitoring information are the various reports of SEAG and TRG, supplemented where available by information from various other community fora and local authority data.

The EDF uplift papers considered whether the environmental impact from the change in workforce numbers is significant in comparison to the assessments within the DCO ES. Another key consideration was to determine whether the existing approved mitigation that is in place to reduce impact would be sufficient, and if not, to propose new or revised mitigation, which would ensure that effects were at least the same as those assessed within the DCO. The Environment Health Topic Paper set out the following as the environment foci: Noise & Vibration; Light Pollution; Air Quality; Waste; Waste Water; Sustainability and Ecology. The KPIs in Figure 8.2 are to be reported to the Environment Monitoring Group), then to SEAG, on a quarterly basis, to ensure that impacts are reported, addressed and ultimately impacts reduced as far as possible.

Figure 8.2: Environment KPIs

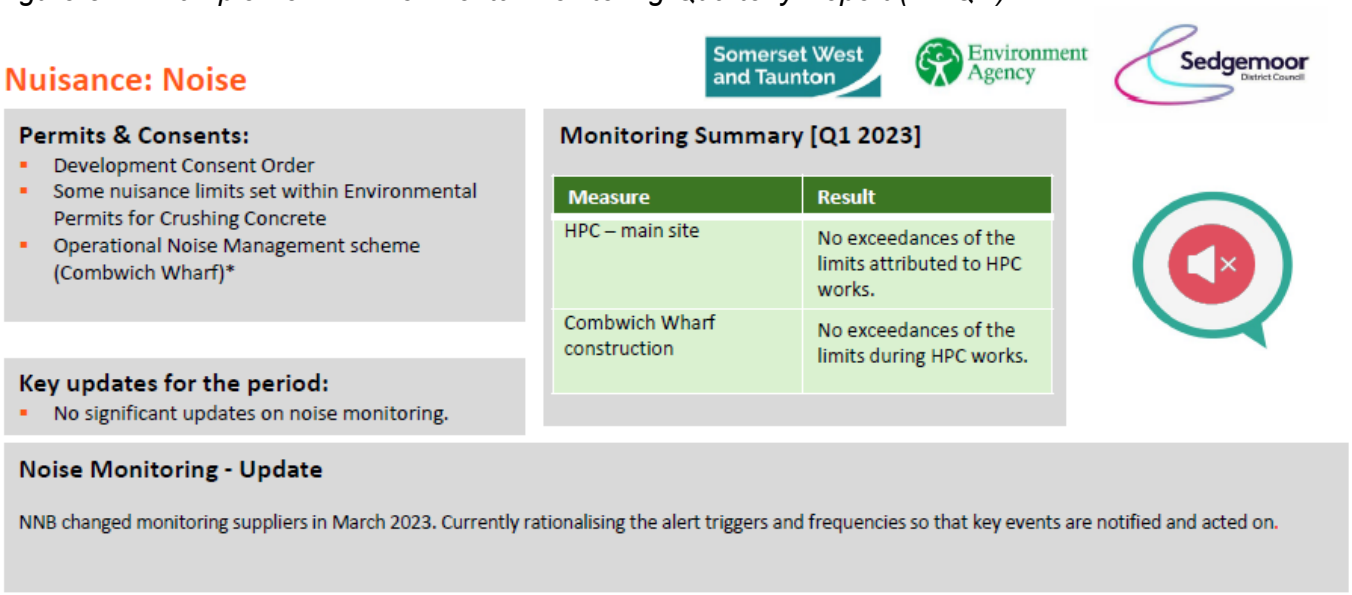
1. Noise - no. of noise level breaches attributable to the HPC project recorded at the HPC site within the quarter
2. Noise - no. of noise notifications attributable to the HPC project recorded at Combwich Wharf within the quarter
3. Air Quality - no. of AQ level breaches attributable to the HPC project recorded at the HPC site within the quarter
4. Lighting - % Actions completed in response to the previous Quarters lighting survey
5. Ecology - % Actions completed in response to the previous Quarters ecology survey at the HPC site
6. Ecology - % Actions completed in response to the previous Quarters ecology survey at AD Sites
7. Sustainability - % of diversion from landfill of inert and non-hazardous waste from construction activities and offices at HPC and AD Sites within the quarter
8. Sustainability/Air Quality - performance against target for Diesel consumption on the HPC Site
9. Reporting - no. of Medium/High/Very Serious Environmental Incidents within the quarter
10. Community - no. of environmental related complaints received within the quarter

8. 2. Monitoring Findings

The key Biophysical and Environmental Health issues identified are Noise & Vibration; Light Pollution; Air Quality; Waste; Waste Water; Sustainability; and Ecology. Management plans exist for these topics; it is assumed that mitigation and monitoring work is in hand. Following from the monitoring reporting gap identified in the 2019 HPC Study 1, an Environmental Monitoring Group was set up to report to SEAG on environmental indicators (see HPC Environmental Monitoring quarterly reports for 2022 and 2023). They report on Nuisance-Noise, Nuisance-Lighting, Air Quality and Emissions, Pollution Prevention and Incidence Response, Waste Management and Ecology. These reports largely describe relevant permits and consents and note key updates for the period, but are light on quantitative measures (See Figure 8.2). There is some data on Community Complaints, with noise being the key issue although at quite a low level.

However, currently, all the biophysical and environmental health impact topics addressed in this section lack the detailed publicly available impact information needed to complete an audit. Most environmental impacts are well regulated, with various standards and thresholds, and monitoring mainly relates to any exceedances of such standards and thresholds. It is assumed that there is appropriate monitoring for such environmental health impacts, such as noise and air for HPC construction, and these are likely within predicted thresholds. However, the IAU found little publicly available detailed information to confirm this, other than the relatively low level of local complaints detailed in the EMQR's. It is unclear how data is collated between the parties involved (Council, EDFE, and EA) and if the sum of these add up to more significant impact on the public.

Figure 8.2: Example from Environmental Monitoring Quarterly Report (EMQR)



For context, the construction activities which were going to cause the most significant environmental effects on receptors have been completed by the time of reporting, including the main civil stage earthworks, the works to the southern landscape area and the construction of the emergency access road. The suite of environmental management plans were principally designed to address impacts during these activities. The one current material change, the proposed removal of the acoustic fish deterrent and addition of compensatory offset measures, will require new monitoring (Environment Agency 2024). Site control measures such as noise monitors and air quality monitors remain in place until the end of construction as well as the best practice methodologies set out in the suite of management plans. EDFE are committed to continuing to report any breach of noise, air quality or other limits and will provide information via the new Environment Monitoring Group. If monitoring reveals that any amendments to the Environmental Management Plans would be appropriate, EDFE will revise them as required.

8. 3. Auditing of Findings

As noted, detailed environmental monitoring information is currently not publicly available or has not been located, although there is fragmented evidence on various outcomes in the Environmental Monitoring quarterly reports (EMQR). Overall, there is a major problem of data analysis and availability in relation to the impacts of HPC construction. This relates to both LAs and EDFE. The RAG audit below draws largely on the partial information in the EMQR documents and a few examples of audited impacts are noted. The split cells (including blue) indicate that auditing is very limited due to the absence of detailed monitoring data.

Table 8.1: Audit of actual against predicted Biophysical and Environmental Health impacts

Impact sector	Commentary on actual vs predicted impacts Commentary on performance in relation to objectives and targets (as available)	Summary RAG colour coding

Noise and vibration impacts	Environmental Monitoring quarterly reports (EMQR) indicate there were no exceedances. A small number of complaints on noise. No complaints highlighted on vibration.	LG	B
Air quality and dust	EMQR notes no breaches of air quality levels attributable to the HPC project recorded at the HPC site within the quarter.	LG	B
Light pollution	EMQR notes actions completed but no publicly available data has been located relating to light pollution and therefore the accuracy cannot be audited	A	B
Water quality	EA permits are in place. No publicly available data has been located relating to water quality and therefore the accuracy cannot be audited	A	B
Waste management	100% diversion of non-hazardous and inert (construction & office) waste from landfill; duty of care audits undertaken on all main civils Tier 1's; focus on waste segregation and waste reduction continues..	LG	B
Ecology	EMQR notes scheduled monitoring and habitat enhancement works undertaken. AD ecology audits: mitigation habitat continuing to establish really well across the AD sites. Water voles have moved into ditches at Junction 23; also recorded increase in signs of badger and otter at some of the AD sites.	LG	B

9. Overview and Implications for HPC Project

9.1 Overview of Refresh of Indicator Ratings for Peak Construction

Auditability of predictions

Auditing of predictions needs clear indicators and good monitoring information for those indicators. The research has shown considerable variation in both the provision of indicators and flows of monitoring data over the peak construction period to date. The various uplift papers have introduced, in some cases, revised targets. Where not, the default position is the original targets/KPIs. However, indicators are still sparse in some sectors. As for the early construction impact study HPC Study 1, publicly available monitoring information is generally better for the employment, transport, and social and community impacts sectors than for accommodation, and especially for biophysical and environmental health. Explanations of variations include the relative efficiency and organisation of the various monitoring groups involved in the HPC project, the relative quantitative nature of some of the sectors (e.g traffic flows, employment numbers), and the ES/DCO/S106/Uplift specificity of indicators and targets as noted. It is important to note that 'peak construction' focus for these findings is a somewhat flexible concept for the HPC project. The report has focused on trends in data over the period from 2021 onwards, with employment numbers of over 7000, and rising to over 11000 in 2024, but the absolute peak may be higher still, partly depending on workforce definitions.

Summary assessment of predictions

Table 9.1 provides a summary of the audited peak construction predictions for the various sectors, gained as far as possible from the publicly available monitoring data. The table also includes summary RAG colour codings for each sector, although these may cover some detailed variations across sector indicators. For comparison, the RAG codings from the early construction study are also included in the table.

Table 9.1: Summary of the audited peak construction predictions for the various sectors

Impact sector	***Commentary on actual vs predicted impacts***	***Summary RAG colour coding – peak construction stage***			*Comparative Summary RAG colour coding – early construction stage (Study1)*	
Economic development	**At the current, peak construction stage, the project is performing very well against predictions in many impact areas**, including local employment content, training and education, apprenticeships, jobs brokerage, local supply chain inputs and tourism. Mitigation and enhancement measures appear to be working well. **However, the actual level of total workforce numbers quickly and greatly exceeded Uplift 1 predictions**. Information also continues to be lacking on disaggregated employment impacts (eg skills analysis for HB and NHB workforce and opportunities for various disadvantaged or under-represented groups).	DG	O		LG	A
Accommodation	Recent findings reinforce the predictions of a concentration of the NHB workforce in the former Sedgemoor District, partly reflecting the location of the large Bridgwater Campus. Similarly, peak findings for the distribution of the HB workforce are similar within Somerset to the original default Council predictions, and Uplift Spatial Distribution estimates. The mix of NHB housing type was skewed more to PRS than predicted. **The housing support strategy, and the resultant delivery of bedspaces, appears to be working well.** It is difficult within the constraints of publicly available data, to identify housing impacts on local vulnerable groups, although there does not seem to have been to date a noticeable impact.	LG	A		A	
Social and community	**Overall, there is a continuation of good performance against many of the impact indicators**. For health, the staffing growth of the on-site Hinkley Health Medical Campus has provided a high level of medical treatment and advice for the workforce, taking the pressure off the local NHS services. For community safety, there appears to be good management of potential project impacts through a combination of mitigation measures,	DG	A		LG	

	including the implementation of the Worker's Code of Conduct. Data reported to SEAG on crime linked directly to HPC show no major changes, relative to workforce numbers, on the outcomes for early construction. Schoolchildren numbers are becoming much higher than the original DCO predictions, and the EDFE funded/Somerset mitigation provision may not be adequate, depending on family distribution. Some construction impacts affect community wellbeing; the Community Impacts Mitigation (CIM) fund provides some examples of compensatory measures although it is difficult to evidence a direct link from these to wellbeing. Levels of complaints remain low, with the exception of fly parking (covered under transport).					
Transport	**There is a continuation into the peak period of good performance against predictions for many transport indicators**. These include the key indicators of mode share for workforce journey to the main site, with the bus system working well, and the Delivery Management System (DMS) actuals v HGV limits. However, some breaches in terms of HGV limits, timing restrictions, routing violation have increased over time from initially very low figures. **Less positively, the car share system for worker journeys to the P&R sites, continues to be less effective than predicted, and there is the continuing issue of fly parking**. However, management responses are in hand for both issues. Key transport infrastructure, including the jetty and P&R sites, are now in place in comparison with early stages of the project.	DG	O		LG	A
Biophysical and Environmental Health	In contrast to the early stage construction study, the biophysical and the environmental health impacts of the development on the local area (eg. noise, waste) are considered together. Other Environmental Health impacts, of the workforce on local health services and on the local population, are in the Social and Community section. It is good to see a new set of KPIs to be reported to a new Environmental Monitoring Group, **However, as for the early study, the topics addressed in this section still lack the detailed publicly available impact information needed to complete an audit.** Most environmental impacts are well regulated with various standards and thresholds, and monitoring mainly relates to any exceedances of such standards and thresholds. It is assumed that there is in place appropriate monitoring for such environmental health impacts, such as noise and air	LG	B		A	B

	for HPC construction, and these are likely within predicted thresholds.					

9.2 Impact Assessment, Monitoring, Adaptive Management and Uplifts 1 and 2

Impact assessment should be an iterative learning process, rather than a one-off linear process. The need for such a process is compelling considering the limitations to predicting complex impacts prior to the beginning of a project. This is particularly so when we are dealing with the assessment of the socio-economic and biophysical impact of major projects where uncertainty and complexity are key features, as for HPC (Glasson 2022). This was noted in the generic recommendations for future new nuclear projects in the earlier HPC Study 1 (IAU/NNLG 2019), as follows:

- *It should be recognised that some construction impact predictions (eg workforce labour demand curve, and accommodation tenure mix) may require a refresh against a timeline to review and update baseline conditions, actions and project evolution (especially moving towards peak construction). This should be part of an effective* ***adaptive impact assessment process*** *(plan, monitor and manage).*
- *KPIs need to be clearly set out and consistently monitored. There will be a need for changes to some KPIs, and the need for new ones as the project unfolds; these changes and additions need to be transparent and agreed in a consistent way by monitoring bodies.*

As noted in s3.1, Uplift 1 (EDFE 2022) provided a major review, 2019-2022, of the likely size of the peak construction workforce and associated socio-economic indicators. **This update followed from an EDFE '*internal review of the project in 2019 that revealed that in order to maintain safety and quality standards and the construction programme, there was a need to increase the peak number of workers on site from 5,600 to 8,600'*.** EDFE produced a set of six Uplift Topic Papers, covering the six sectors of this and previous reports, to assess the local impacts of this uplift. The conclusions of the review revealed that in order to maintain safety and quality standards and to maintain the programme, the number of workers at the peak of construction will need to be increased above the number that was originally assessed within the DCO application. The review highlighted that there would need to be a greater overlap between the Mechanical Electrical and Heating (MEH) and Civils phases of the project and that the number of support and professional/management roles based at the HPC site would be significantly above the number anticipated in the DCO application. The various uplift papers have been built into each sector refresh study; in some cases, they introduce revised targets. Where not, the default position is the original targets/KPIs.

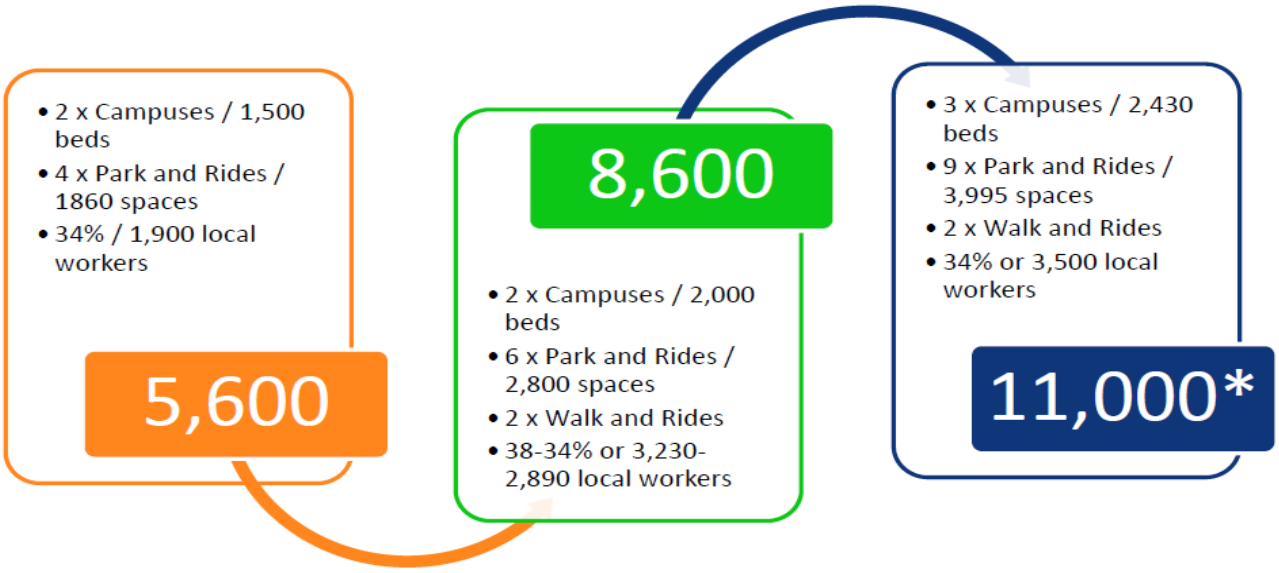
Whilst this report has sought to include predictions and indicators for Uplift 1, which were publicly available during the study period, the review team were aware of a further complexity introduced in 2023-24+ with work by EDFE on a further uplift plan (Uplift 2). This is likely to increase peak employment to over 12,000 (and possibly much higher still), with additional mitigations on the anticipated changes in accommodation, transport, health and other impacts. The detailed papers underpinning Uplift 2 were not publicly available for this study, but some likely assessments of implications are included here drawing primarily on an EDFE public presentation made to the HPC

Community Forum in May 2024. The reasons given for this subsequent uplift, so soon after the first one, were:

- *Organisational: a wider overlap between the Civils and Mechanical and Electrical phases of construction.*
- *Speed: aim to complete HPC around the end of the decade and to commission unit 1 in 2029.*
- *Clarity: following their mobilisation there is a better forecast from the MEH Alliance on the workers they will require in the years ahead.*

A number of scenarios are being tested in Uplift 2, including: understanding that there are limits to workforce expansion both at HPC itself and in the community, and minimising who needs to come to site and how to best utilise modern ways of working at site and at other project locations. Associated with the latter is a scenario considering an 8-day (rather than 5-day) rule being the appropriate means to understand true workforce impact in some of the topic areas. It is noted that all developing scenarios will have the benefit of the real life, practical experience and evidence (i.e adaptive management approach). The Topic Papers are being updated to test the scenarios and agree the package of mitigation measures (EDFE Community Forum May 2024).The presentation to the Community Forum also included some interesting graphics neatly summarising some of the management mitigation responses to the various uplift cycles (see Figures 9.1, 9.2 and 9.3).

Figure 9.1: Changes to manage impacts following from Uplift (2) of peak employment numbers (EDFE 2024)



As noted in the Uplift 2 scenario approach, it is important to draw on practical experience and evidence. The May 2024 presentation also includes an outline of the monitoring and feedback organisational structure, with SEAG and TRG as key units, underpinned by various groups and community fora. This is little changed from that used in early project construction, but with the addition of an Environment Group, as proposed in the early construction report (IAU 2019). Of course, however, monitoring is only as good as the efficiency of the constituent elements. This auditing review suggests that there are still areas for improvement, including for example public access to some

disaggregated Workforce Survey data, detailed Environment data and the frequency and timeliness of publication of some data.

Figure 9.2: Some initial mitigation responses (EDFE 2024)

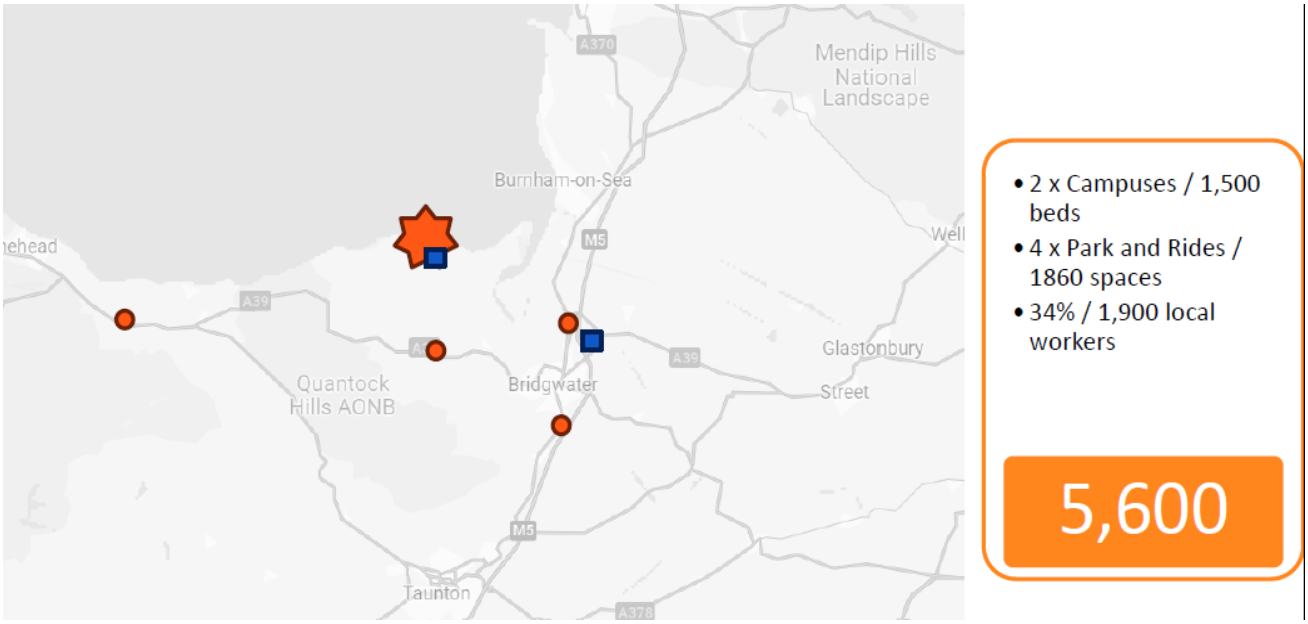


Figure 9.3: Latest mitigation responses (EDFE 2024)

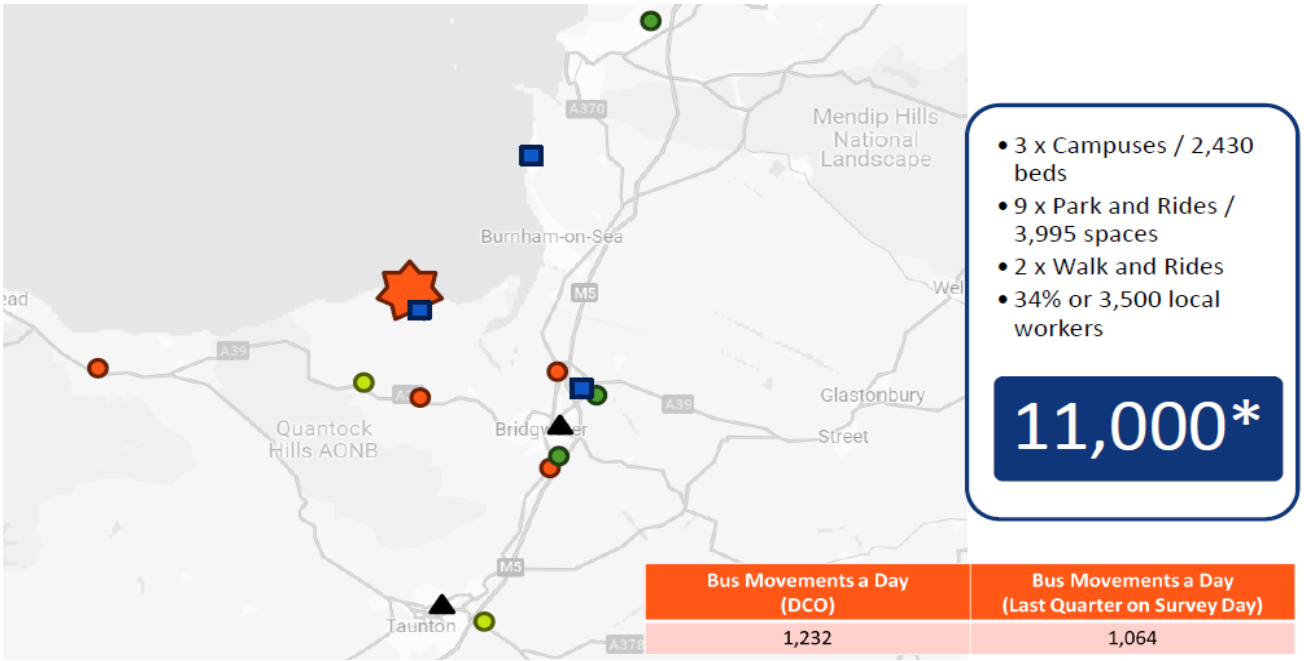
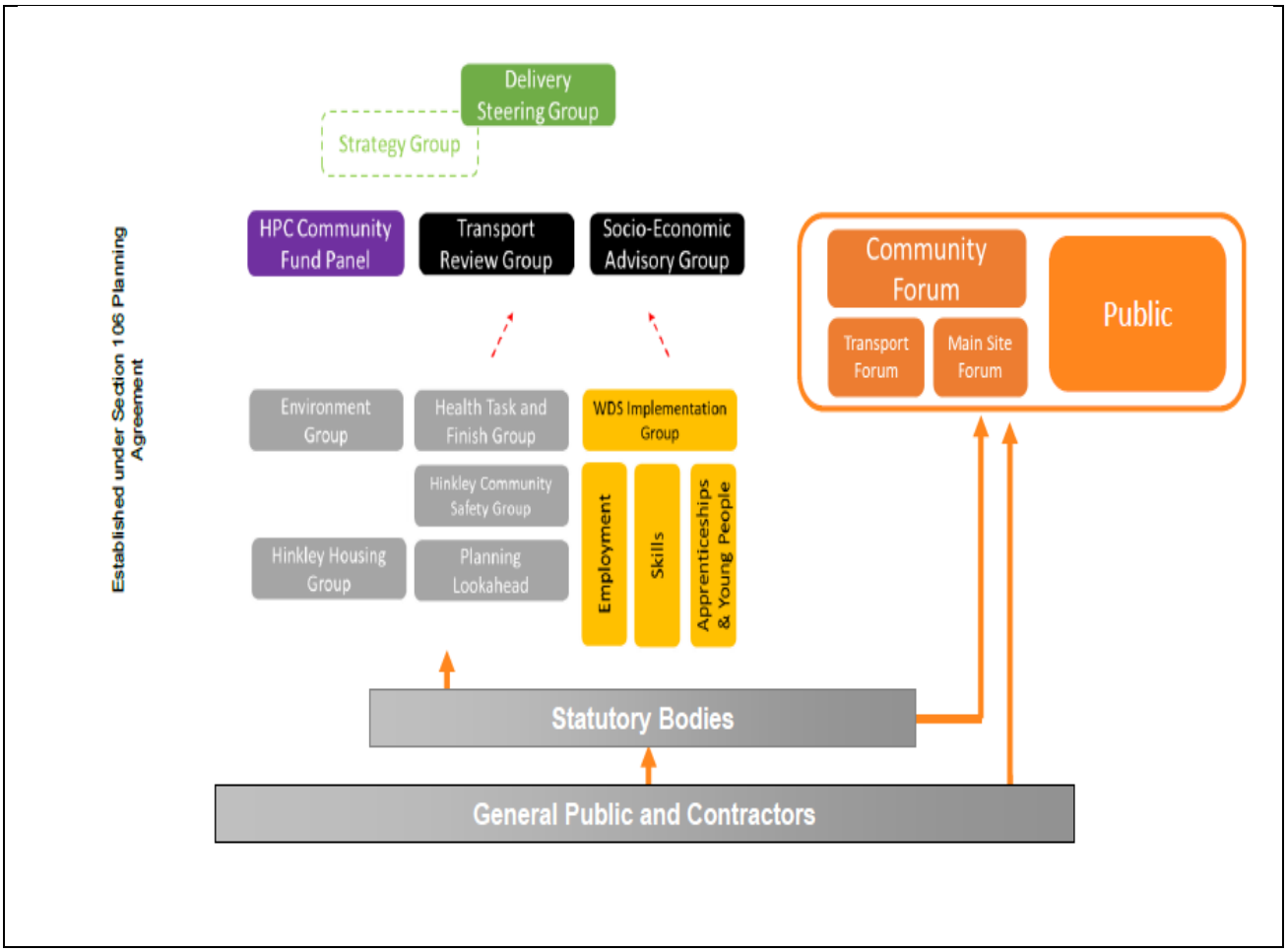


Figure 9.4: Monitoring and Feedback structure


Established under Section 106 Planning Agreement
Delivery Steering Group
Strategy Group
HPC Community Fund Panel
Transport Review Group
Socio-Economic Advisory Group
Environment Group
Health Task and Finish Group
WDS Implementation Group
Hinkley Community Safety Group
Hinkley Housing Group
Planning Lookahead
Employment
Skills
Apprenticeships & Young People
Community Forum
Transport Forum
Main Site Forum
Public
Statutory Bodies
General Public and Contractors

PART 3: RELEVANCE FOR OTHER STUDIES

10. SZC Proposed NNB

10.1 Brief consideration of HPC experience for SZC construction and operation

This section reviews the coverage of the HPC Study 1 2019 findings and recommendations in the SZC proposals, and conditions and requirements (e.g. in proposed project governance and monitoring). Key SZC sources reviewed, relevant findings and recommendations, and some comments on implications for SZC construction, are set out in Table 10.1. Some overall conclusions and a summary of some considerations for the project governance and monitoring of the SZC construction stage, distilled from the table contents, follow on in s 10.2.

Table 10.1: Sources and some relevant information findings

Key sources	Findings and recommendations	Some comments and potential issues re SZC
EDF Environmental Statement (ES) for SZC (EDF 2020)	There is some limited reference to the 2019 HPC Study 1, for example in the ES Economic Statement (8.9 2020). There is also reference to earlier IAU research (Glasson and Chadwick 1995) on the local socio-economic impacts of the construction of SZB.	Concern that little reference to the HPC Study 1; however, acknowledged that it came out after most SZC ES work completed.
LA Local Impact Report (LIR), East Suffolk Council and Suffolk County Council (May 2021).	There is considerable reference to 2019 HPC Study 1 in the LIR, relating to particular sectors of impacts – e.g. economic, skills and employment, accommodation and housing. The IAU HPC Study 1 identifies (page 62) that *"the monitoring system is not delivering enough accurate and disaggregated employment information, especially on local content by skill category and by disadvantaged and under-represented groups.* *23.34. Similarly, there is a lack of disaggregated data on supply chain impacts in Somerset and districts.* *23.35. Improved, full, transparent and publicly available Workforce Survey needed to underpin the better auditing of many socio-economic impacts."* *23.36. These are important observations which need to be addressed when setting up the monitoring framework*	The LIR was obviously very keen that the lessons from the monitoring of HPC were considered in the SZC examination and built into recommendations and conditions in the SZC DCO (see below section on SZC DCO) From LIR --- *directed primarily at the developer, the report recommends (page 63): "It should be recognised that some construction impact predictions (e.g. workforce labour demand curve and accommodation tenure mix) may require a refresh against a timeline to review and update baseline conditions, actions and project evolution (especially moving towards peak construction). This should be part of an effective adaptive impact assessment process (plan, monitor and manage).* EDFE HPC has indeed used, very substantially, an adaptive impact assessment approach in its major workforce uplift in 2022. However, it is of some concern that only 12 months later there is a further substantial workforce uplift proposal for HPC. This begins to cast doubt on the SZC peak workforce prediction – is it too low?

	It also refers more generally to implementation and deliverability risks. *The (IAU) study compares actual impacts with those predicted in the Hinkley Point C DCO, seeks to explain factors for differences, and provides recommendations for future NSIP DCOs.* *Many of the factors identified related to implementation and deliverability, including long time delays in commencement of construction project; project modifications; changes in baseline conditions; inadequate resourcing of monitoring; lack of trigger points in DCO/s106 obligations and requirements; lack of clarity in definition of some indicators; over-focus on peak construction impacts; and inadequacies of predictive techniques. Some of these categories overlap; for example, project and baseline changes are more likely with a lengthy authorisation process*	
Development Consent Order (DCO) Conditions and Requirements (2022)	There is considerable reference in the approved SZC DCO to Requirements and Conditions related to monitoring and mitigation of various project impacts, including to the monitoring methodology, frequency of monitoring and format of monitoring reports. Details of coverage will be in various plans (e.g. Terrestrial Ecology Monitoring and Mitigation Plan). Overall construction must be carried out in accordance with the Code of Construction Practice (CoCP) and subsequent plans under this Code. *CoCP (2.3.1) Sept 2021 Monitoring, management and mitigation plans then provide ESC (as discharging authority) and the Ecology Working Group, the Environment Review Group and Delivery Steering Group (established by the Deed of Obligation) appropriate oversight of the implementation of the project in order to review the effectiveness of mitigation, and where this is not effective, provide further remedies that would be agreed and implemented by SZC Co* *(2.4.10) Monitoring, environmental performance and formal compliance auditing will be conducted throughout the duration of the construction of Sizewell C in order to demonstrate the effectiveness of the measures set out in the CoCP and related construction controls, monitor the impact of construction works and recommend actions that may be necessary to ensure compliance with the CoCP. This approach will ensure that appropriate reporting is provided*	From Vol 4 of Examining Authority (ExA) report (PINs 2022), the ExA noted the importance of monitoring for the project: *The monitoring of potential effects of the construction workforce would be needed to identify where and which mitigation measures need to be enacted. The Applicant would continue to agree relevant indicators of effects with local authorities responsible for services that may be affected. From time to time, East Suffolk Council and the Applicant would propose relevant indicators to a Socio-Economic Advisory Group for its approval. The establishment of the Socio-Economic Advisory Group would be secured through an obligation in the DCO.*

Sizewell C 8.4 Planning Statement Appendix 8.4J Section 106 Heads of Terms	Monitoring requirements figure clearly in this document e.g. *6.9 Monitoring (Workforce and Socio-economic Impacts)* *6.9.1 SZC Co. shall undertake monitoring of the impacts of the Sizewell C Project on the local community, including workforce surveys and any other monitoring as may be agreed between SZC Co. and the Socio-economic Advisory Group. A number of sub-groups, such as the Community Safety Working Group and Sizewell C Health Working Group, will be responsible for monitoring effects related to their area of expertise.* *6.9.2 SZC Co. will monitor the construction workforce and the accommodation being used by workers. Regular workforce surveys would be undertaken, fixed to a statistically significant sample size, and with consistent survey questions that can provide longitudinal data.* There is also reference to more specific monitoring activities e.g --workforce and freight traffic movements --impacts on European sites Other contents also build on HPC construction initiatives, and relate to some of the IAU Study findings e.g. *-- Sizewell C Community Fund: would be available to be spent on measures which the community consider could enhance the quality of life in the local area or enable people to make the most of the opportunities offered by the Sizewell C Project* *-- Part of the Housing Fund would be set aside to support the supply, capacity and resilience of the tourist accommodation sector and latent accommodation. Another part of the housing fund would be provided as a reactive contingency which ESC could draw upon to mitigate any potential effects of the construction workforce on vulnerability to housing need and homelessness*	It would still be useful to see an overall construction stage-monitoring plan, bringing together key KPIs/indicators for all socio-economic, traffic and environmental impact sectors, and setting out the organisational framework for collecting and reporting data. There does not seem to be any reference to an independent auditing of the findings from the proposed monitoring studies. As for the HPC project, and especially for the Sizewell B project, such auditing can provide a valuable check on findings and a neutral position between the various agencies involved in the project. All monitoring findings and any auditing activities should be publicly and efficiently available. It is also unclear whether some of the identified limitations of HPC monitoring will be adequately covered at SZC, for example relating to *--lack of disaggregated employment information, especially on local content by skill category and by disadvantaged and under-represented groups; and* *--. lack of disaggregated data on supply chain impacts at county and district level* *-- Issue of concern at HPC about wellbeing of older residents. Case for more emphasis on this in the SZC Community Fund?* Good example of learning from HPC and the particular case of the Suffolk tourism industry.
8.4 Planning Statement Sizewell C Appendix 8.41 Implementation Plan (May 2020)	The Implementation Plan sets out clearly the indicative phasing schedule for key elements of Main Site and Associated Development (AD) construction activities. For example, the Main Site Accommodation Campus will be built in Year 2 and be available from year 3 onwards.	The delayed triggering of some AD projects for HPC (e.g Bridgwater Campus, and Site Jetty) were cause of some impact issues. Hence, it is important to monitor closely the phasing of such key works.

Other documentation: Hinkley Point C Socio-Economic Impact Reports (EDF 2022, 2023)	As noted in IAU 2019 HPC Study 1 and current Study 2 reports, these reports and monitoring data show what is possible in terms socio-economic benefits – including: • Apprenticeships: HPC has exceeded targets with over 1300 to date, and SZC aiming for 1500. Key is the percentage of local recruits – c 70% in CDCZ for HPC, and c 20% female at HPC. • Local supply chain benefits: HPC has also exceeded well the target of £1.5bn to SW industries (now over £5bn); which shows what might be possible for SZC. John Dugmore, Chief Executive of Suffolk Chamber of Commerce, said: *"These latest figures from Hinkley Point C show what we can achieve here in Suffolk and East Anglia regarding supply chain opportunities to support economic growth. Our Supply Chain engagement team are working with almost 2000 businesses, who are eager to get started, to get them fit and ready to seize the huge supply chain opportunities that the Sizewell C project will bring to our region."*	Should SZC be aiming higher still on some indicators—e.g. local apprenticeships, and female recruitment? Will the SZC project receive the same levels of education, skill and training initiatives and funding as received by HPC?

10.2 Some overall conclusions and a summary of some considerations for the project governance and monitoring of the SZC construction stage.

Some overall conclusions

There appears to have been only very limited reference to the IAU 2019 HPC Study 1 in the developer's Environmental Statement, although not all the wide array of documents have been reviewed here. This contrasts with the content in the local authorities' Local Impact Report that shows that the Suffolk authorities were very keen for a consideration of the findings from the HPC monitoring and auditing study in the SZC examination and in recommendations and conditions in the SZC DCO. The Examining Authority also noted the importance of impacts monitoring for the SZC project; this is developed in the DCO Requirements and Conditions, in various project construction Management Plans, and in the Planning Statement. These include, for example, referencing to the monitoring organisation, including the establishment of the Socio-Economic Advisory Group and its various sub-groups, and to the key regular Workforce Surveys.

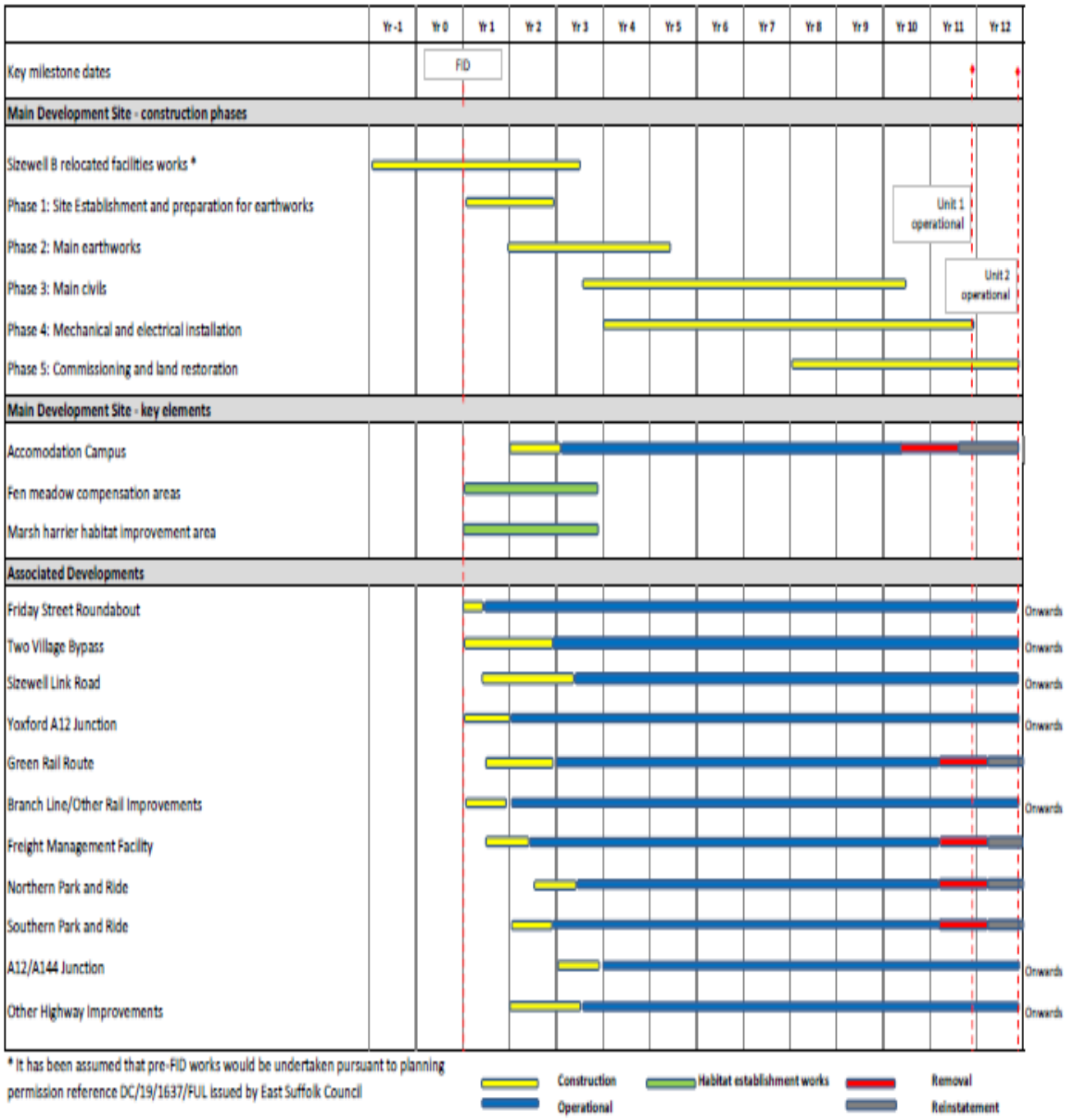
Some considerations for the SZC project

Notwithstanding the valuable learning from the HPC project for Sizewell C, there are a number of recommended considerations for the project governance and monitoring of the SZC construction stage including:

- The further substantial workforce uplift proposal for HPC begins to cast doubt on the SZC peak workforce prediction – is it too low?
- It would still be useful to see an overall construction stage-monitoring plan, bringing together KPIs/indicators for all socio-economic, traffic and environmental impact sectors, and setting out the organisational framework for collecting and reporting data.
- There does not seem to be any reference to an independent auditing of the findings from the proposed monitoring studies. As for the HPC project, and especially for the Sizewell B project, such auditing can provide a valuable check on findings and a neutral position between the various agencies involved in the project.
- All monitoring findings and any auditing activities should be publicly and efficiently available on local authority websites.
- It is also unclear whether some of the identified limitations of HPC monitoring will be adequately covered at SZC, for example relating to lack of disaggregated employment information, especially on local content by skill category and by disadvantaged and under-represented groups, and lack of disaggregated data on supply chain impacts at county and district level.
- The delayed triggering of some Associated Development projects for HPC (e.g Bridgwater Campus, and Site Jetty) were cause of some impact issues. Hence, it is important to monitor closely the phasing of such key works. Figure 10.1 does helpfully provide an indicative phasing schedule for SZC AD projects.
- Should SZC be aiming higher still on some indicators—e.g. percentages of local apprenticeships, and female recruitment?
- Will the SZC project receive the same levels of education, skill and training initiatives and funding as HPC?

Figure 10.1: Indicative phasing schedule for SZC AD projects

Plate 1.1: Indicative phasing schedule



11. New Nuclear Technologies – the potential Local Impacts of Small Modular Reactors (SMRs)

11.1 Introduction and context

The topic of Small Modular Reactors (SMRs) as an important element in the future energy mix is not new and there has been interest for well over a decade. However, interest has accelerated over the last five years, perhaps partly due to some of the perceived problems with large reactors (LRs), including construction complexity, escalating costs, inflexibility to meet more specific needs/locations, long construction periods and local resistance. The approach here is to compare potential local impacts with those with which we are familiar with LR new builds. The study will also consider any implications of 2019 HPC Study 1 and current HPC Study 2 HPC monitoring findings and recommendations for future SMRs impact assessment and management.



Figure 11.1: Sketch of prototype Rolls Royce SMR (Source: Rolls Royce)

11.2 Nature of SMR projects to consider in impact assessment

What is the MW output size? There is a general view that an SMR is up to 300MW although some are somewhat larger (e.g. current Rolls Royce design at 470 MW). Above that and up to 700MW they are more medium sized reactors. This compares with English new build LRs of 3200MW (2x1600). There is a view that many of the advantages of SMRs reduce when size increases into the medium range.

There are currently two main categories of SMR projects – those based on Gen III+ technologies, which are relatively close to commercial readiness and using a LWR (Light Water Reactor – predominantly a PWR, for example the Rolls Royce SMR PWR). The term advanced modular reactor (AMR) usually refers to a variety of Generation IV reactor technologies that are at an earlier stage of development using different coolants (e.g. sodium–cooled, heavy metal - cooled). The focus here is on the Gen III+ technologies. There are also developments in some parts of the world of marine-based floating and submersible power plants, with multiple reactors relocatable from one potential site to another. *Table* 11.1 sets out some of the claimed advantages of SMRs compared with LRs that might affect a planning and assessment process. However, it is also important to note some of the potential disadvantages of SMRs compared with LRs as set out in Table 11.2.

Table 11.1: Claimed advantages of SMRs compared with LRs

- Modular off-site construction (RR argues c90% of their SMR power plant will be built or assembled in factory conditions, and around 80% could be delivered by a UK supply chain); also smaller construction infrastructure needed.
- Reduced upfront investment needs, reduced financial risk, more manageable capital costs (the RR-SMR is now targeting a delivery price of £40–60/MWh for its power station, a similar price to offshore wind generation); however, recent US figures suggest much higher rates of c£300 per MWh (BloombergNEF 2023).
- Flexibility for new markets, for example powering data processing hubs, desalination plants, green hydrogen, combined heat and power schemes, remote mining sites; and also old markets -- with the size of SMRs providing a greater opportunity to repower existing coal and natural gas stations as nuclear ones.
- Also more flexible re locations, for example on land and sea, in more remote locations but also closer to urban areas; not as tied to large water resources as LRs.
- Much smaller impact footprint (e.g RR design equivalent to 2 football pitches on a larger site of approx 12 acres) with smaller security zones, reduced offsite emergency planning zones (EPZ) etc; although may wish to include a larger site option to allow for series of connected SMRs.
- Because of smaller output, also fewer emissions (e.g. warm cooling water).
- The enhanced safety features of SMR designs provide assurance that there will not be significant adverse transboundary impacts, especially if situated far enough from the border.
- Possible partial underground construction, with safety advantages.
- Longer refuelling periods compared with LRs; in extremis, possible replacement of whole reactor.

Sources: IAEA (2020), OECD (2021), and AMRC (2022).

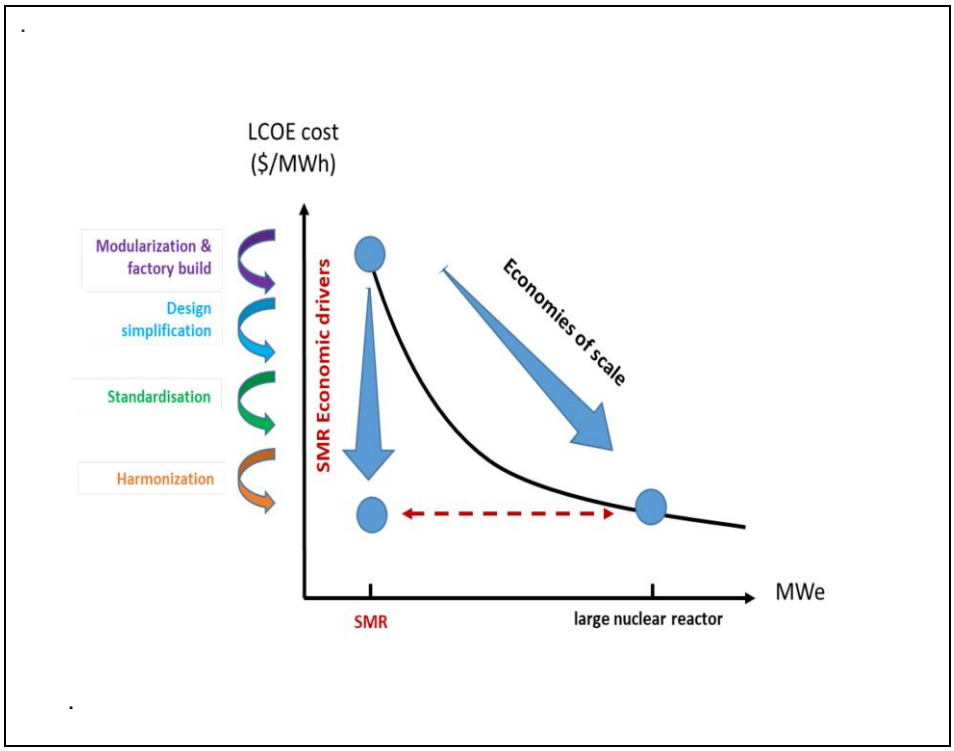
Table 11.2: Some potential disadvantages of SMRs compared with LRs

- Will not benefit from economies of scale of LRs, but might with series of linked SMRs—but then raises cumulative impact issues. Figure 11.2 sets out some of key drivers that may offset diseconomies of scale.
- More spread of waste fuel across more small sites.
- New designs may have teething problems.
- Need programme of several SMRs to reap production efficiencies, highlighting need for some stability of design and a more than national market.
- Need key economic drivers of design simplification, standardisation and modularisation, while maximising factory fabrication and minimising on-site construction, to reap economies of scale (see Fig 1).
- Modular construction likely to have considerable up-front engineering costs for First of a Kind (FOAK) SMR.
- Successful siting of SMR-based plants will require close attention to the preferences of host communities. The need to build on (i) the enhanced safety features of SMRs and (ii) on the opportunities for local and regional job creation such that SMRs are seen as attractive to local communities as large reactors will also be crucial to avoid negative issues.

Sources: as in Table 11.1.

A recent study (Institute for Energy Economics and Financial Analysis 2024) highlights some of these potential disadvantages. Drawing on experience of the only current SMR projects, two operational in Russia, one in China and one under construction in Argentina, the conclusion is they are expensive and slow to build, and overall risky propositions. Cost escalation has been of the order of 300-700% of the original cost estimates for these projects, and similar significant cost increases have occurred at proposed projects in the US. Similarly, three to four years planned construction periods have ballooned out to over thirteen years. Such overruns then increase the risk to the long run financial viability of such projects.

Figure 11.2: Key drivers to offset diseconomies of scale



11.3 Nature of possible localities

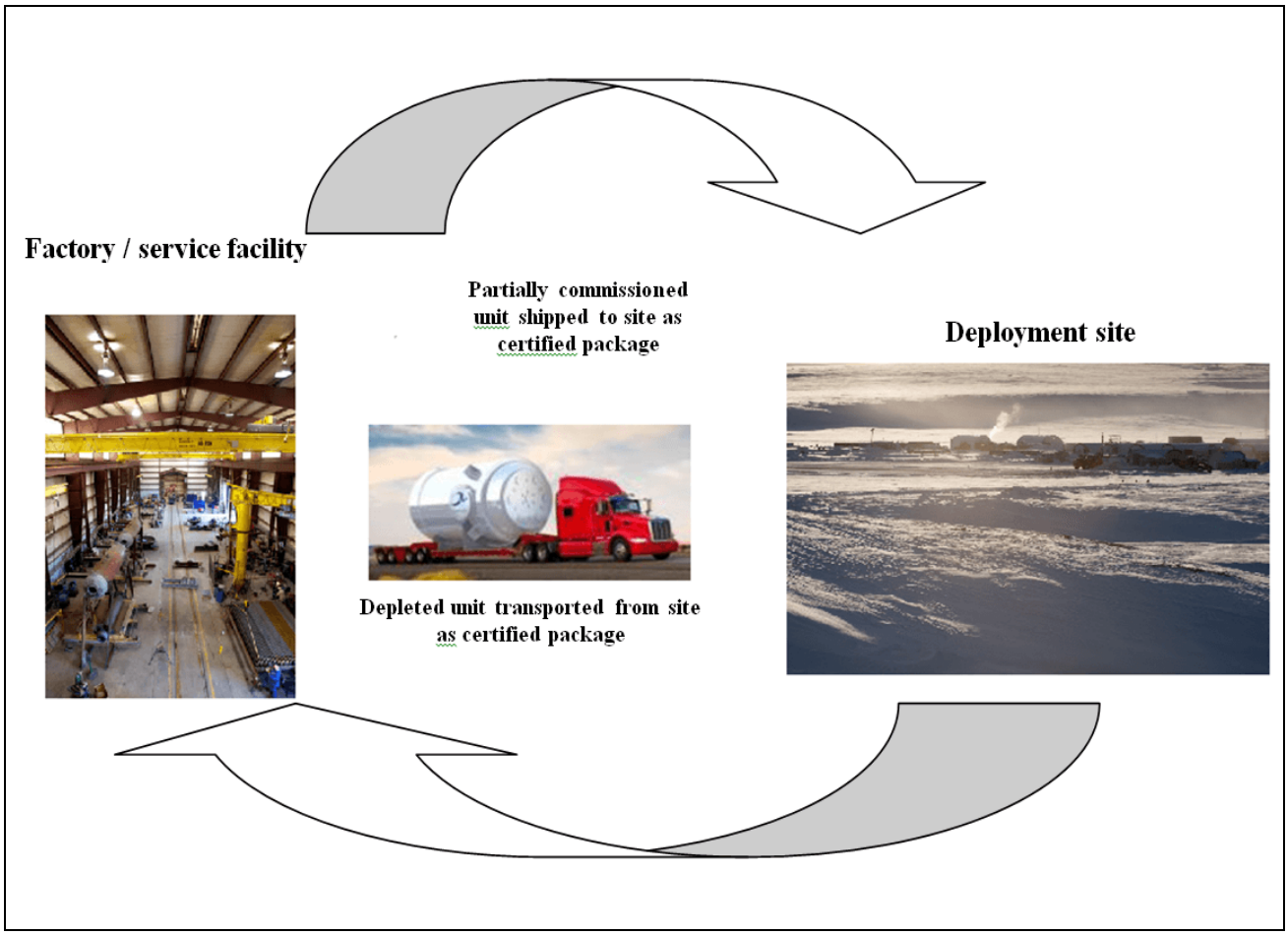
As noted above, SMRs are likely to be more flexible re locations, for example on land and sea, in more remote locations, but also closer to urban areas; not as tied to large water resources as LRs. There will also be links to fabrication facilities – as in Figure 11.3 below. Key elements in the SMR process include:

Deployment site: This is where the facility would be ultimately assembled and come into service. The site would likely have civil structures and supporting systems constructed in advance to support safe operation of the facility. The licensee then would procure reactor modules from the factory / service facility for installation at the site, and then oversee/perform commissioning activities before assuming operation of the facility. There would be regular refuelling of the reactor, or in some cases once the fuel in a reactor module is spent, a new reactor module would be delivered and placed into service. The spent reactor module may remain on the site for a period to cool before there is shipment back to the factory / service facility in a certified transport package.

Factory/service facility: The facility would receive reactor module sub-components from suppliers and assemble them, in a controlled environment, into a reactor module. In some cases of SMRs fresh fuel would then be loaded into the core, with limited commissioning and system integration testing done to confirm the module meets specifications and is ready for shipment.

*Transpo*rt: This will likely involve the transport of substantial modular components. In some cases, it could include the physical movement of a pre-configured and fuelled reactor core and transport of a core's inventory of irradiated fuel.

Figure 11.3: Elements in SMR lifecycle



11.4 Comparative impact by type

Most impact literature has focused to date on risk and safety issues. There seems to have been little work on impacts, social acceptance, and community capacity issues (e.g. staffing and availability of qualified personnel), location challenges for operating a complex technology, and the potential for automation. Materials and manufacturing implications of SMRs appear more advanced than impact assessment and acceptability issues. The nature of environmental impacts originating from SMRs or LRs may not differ greatly, but it is likely that there will be differences in magnitude (Hanna et al, 2019, IAEA 2020).

- *Atmospheric and aquatic emissions*: the modularity of some SMR designs may result in lesser impacts to air and water quality during the construction phase. For the operational phase, the amount of environmental releases are expected to be roughly proportional to the generated power and size of the footprint and hence less than for LRs – unless there is a series of linked SMRs .Partial underground designs may have more implications for ground water layers.
- *Geology, hydrology and soil:* there are no key issues due to characteristics of an SMR that is based either on land or at sea that would differentiate it from a LR during the construction, operation or decommissioning project phase.

- *Terrestrial and aquatic wildlife and habitats*: includes impacts to wildlife through changes in air and water quality, physical disturbance etc. Likely to be largely related to project size in relation to comparisons with LRs. Terrestrial impacts are obviously less regarding sea based SMRs and vice versa.
- *Human health*: radiological and non-radiological issues are related to the nature of SMR designs and will be subject to the same level of regulation and monitoring as LRs. With more modular construction, there may be lower risk of construction site injuries.
- *Landscape and culture*: visual impacts may be proportionately lower than for LRs, and will vary if some undergrounding, or at sea. However, there will still be impacts of transmission lines.
- *Transport and traffic*: will vary between transport of loads and workers. For loads, modular deliveries may need some special infrastructure, especially if the site is remote. For workers, numbers are likely to be proportionately less for both construction because of off-site fabrication, and operation because of potential for more off-site maintenance.
- *Socio-economics*: following from previous transport point, there is likely to be proportionately less employment than for LRs during construction (because of modularity) and for operation (because of more off-site maintenance facilities). In addition, whilst there will still be a need for a range of construction jobs for local people, the scope for local employment may be proportionately less as some of the civil engineering construction employment, which normally provides more local job opportunities, may be internalised in off-site fabrication tasks. All this will have lower knock-on effects for other socio-economic impacts such as on workforce accommodation, health and other facilities. On the one hand, lesser impacts might be welcome locally; on the other hand lower local employment benefits may be less welcome. An exception to all this would be where SMR development was located in remote sites. Then any socio-economic impact could be locally very significant bringing not only the project and jobs, but also associated infrastructure to access the area – eg improved transport access.

11.5 EIA/regulatory regime

In the UK, there has been considerable recent activity on government funding support for SMR design initiatives, and on the regulatory (policy and project) impact assessment regime.

A FOAK SMR is likely to need public sector funding support, and there have been several UK initiatives. For example, in July 2019, the UK government committed £18m as part of the Industrial Strategy Challenge Fund to support the development of the UK SMR proposed by a Rolls-Royce-led consortium. In its 10-Point Plan for a Green Industrial Revolution released in November 2020, the UK government announced an additional £215m for the development of this domestic SMR design (S&P Global Platts, 2020). Already completed under Phase 1 are feasibility studies of 8 Generation IV (Gen IV) SMRs, and there are 3 designs selected for Phase 2, each will receive up to an additional £10m. Another possible £5m was available to regulators to support this initiative.

In March 2023, the UK budget announced funding for competition for SMR designs. By October 2023, the UK Dept for Energy Security and Net Zero had identified six companies to advance to the next phase of the SMR competition for innovative nuclear technologies (EDF, GE-Hitachi Nuclear Energy, International LLC, Holtec Britain Limited, NuScale Power, Rolls Royce SMR and Westinghouse Electric Company UK Limited). Five companies submitted bids in July 2024 and decisions on which designs to take forward are due by the new government by the end of summer 2024. The government's objective is to select technologies that offer the greatest confidence in being able to make a final investment decision in 2029 and be operational in the mid-2030s.

The UK government is also committed to streamline planning, environmental permitting and regulation to speed up new power stations, while maintaining its excellent regulatory framework. There is planning for a new nuclear NPS (EN7) in 2025. The government issued an initial consultation document in Jan 2024 -- *A National Policy Statement for new nuclear power generation: Consultation on the new approach to siting beyond 2025 (*UK Dept for Energy Security and Net Zero, 2024). This might provide the opportunity to include a more streamlined regulatory process and tests (e.g EN-6 lite) that could apply to SMRs and other advanced nuclear projects that are smaller in scale and impacts compared to the large Hinkley Point and Sizewell type LR projects. It may also lead to some opening up of more potential nuclear power locations. At present, new nuclear plants are limited to eight named sites. An opening up of locational criteria, with only population density and proximity to military activities absolutely ruling out development, would lead to a wider range of possible sites. However, this may also lead to locational challenges if key areas of, for example, natural beauty, ecological importance or cultural heritage, are potentially compromised by SMR development.

Elsewhere in the world, for example in Canada in early 2021, the Canadian Nuclear Safety Commission began reviewing a company called Global First Power to build a nuclear reactor at the Chalk River Laboratories site about 200 kilometres NW of Ottawa. This project is an example of a small modular reactor. The Canadian government has exempted such small modular reactors from full federal environmental assessment under the *Impact Assessment Act*. Many civil society groups have condemned this decision because it allows SMRs to escape the public scrutiny of environmental, health and social impacts. The proposed new SMR in Chalk River, like the existing nuclear facilities, would be located on First Nation territory, which is raising major issues about lack of consultation.

In the EU, a Press Release from the European Commission in Nov 23 announced the creation of an industrial alliance dedicated to accelerating the deployment of SMR technologies and ensuring a strong EU supply chain, including a skilled workforce. Earlier, in Aug 2023, Romania's nuclear regulatory commission issued an approval for a US NuScale Power SMR with a gross installed capacity of 462 MW.

11.6 Conclusions and cautions

SMRs do seem to have many advantages over LRs, and potentially there may be fewer local impacts. The UK government is putting considerable faith in their development over the next decade, partly as an alternative to the expensive LR projects. This involves funding support to reach an agreed design, plus ways to speed up the regulatory regime. However, as FOAK new projects, SMRs also face many challenges, indeed challenges similar to those of LRs in terms of escalating construction costs and timescales. At this stage, the future is uncertain. Hopefully, a standardised design outcome might soon help, but this is unlikely to be a quick fix to net zero, and renewables (especially on-and especially off - shore wind, and solar) will be very much needed to help deliver a timely energy transition.

12. New Nuclear Technologies – Fusion Projects

12.1 Introduction

What is fusion? Fusion is the process that takes place in the heart of stars and provides the power that drives the universe. When light nuclei fuse to form a heavier nucleus, they release bursts of energy. This is the opposite of nuclear fission – the reaction that is used in nuclear power stations today – in which energy is released when a nucleus splits apart to form smaller nuclei. To produce energy from fusion here on Earth, a combination of hydrogen gases – deuterium and tritium – are heated to very high temperatures (over 100 million degrees Celsius). The gas becomes a plasma, the nuclei combine to form a helium nucleus, and a neutron, with a tiny fraction of the mass converted into 'fusion' energy. A plasma with millions of these reactions every second can provide a huge amount of energy from very small amounts of fuel. One way to control the intensely hot plasma is to use powerful magnets. The most advanced device for this is the 'tokamak', a Russian word for a ring-shaped magnetic chamber.

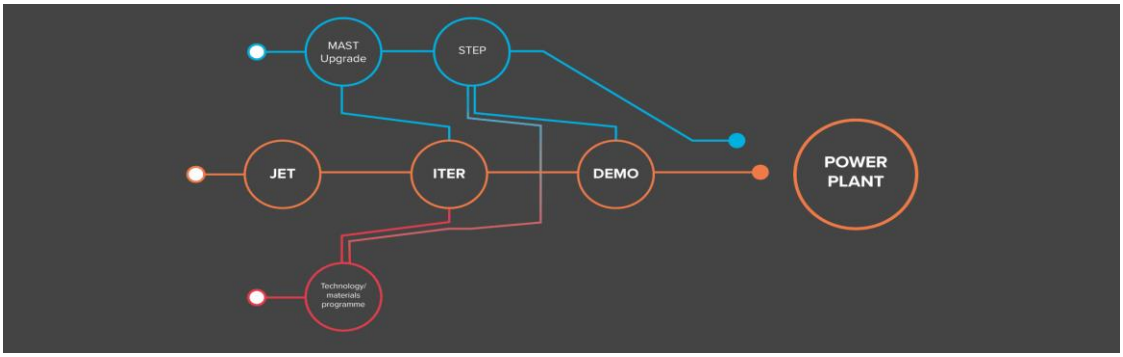
*Advantages of fusion power***.** With increasing concerns over climate change and finite supplies of fossil fuels, we need new, better ways to meet our growing demand for energy. The benefits of fusion power make it an extremely attractive option:

1. *No carbon emissions.* The only by-products of fusion reactions are small amounts of helium, an inert gas that can be safely released without harming the environment.
2. *Abundant fuels.* Deuterium can be extracted from water and tritium will be produced inside the power station from lithium, an element abundant in the earth's crust and seawater. Even with widespread adoption of fusion power stations, these fuel supplies would last for many thousands of years.
3. *Energy efficiency.* One kilogram of fusion fuel could provide the same amount of energy as 10 million kilograms of fossil fuel. A one Gigawatt fusion power station will need less than one tonne of fuel during a year's operation.
4. *Less radioactive waste than fission.* There is no radioactive waste by-product from the fusion reaction. Only reactor components become radioactive; the level of activity depends on the structural materials used. Research is being carried out on suitable materials to minimise decay times as much as possible.
5. *Safety.* A large-scale nuclear accident is not possible in a fusion reactor. The amounts of fuel used in fusion devices are very small (about the weight of a postage stamp at any one time). Furthermore, as the fusion process is difficult to start and keep going, there is no risk of a runaway reaction which could lead to a meltdown.
6. *Reliable power.* Fusion power plants will be designed to produce a continuous supply of large amounts of electricity. Once established in the market, costs are predicted to be broadly similar to other energy sources.

12.2 Fusion in the UK and EU

The United Kingdom's fusion research programme is based at the Culham Centre for Fusion Energy (CCFE) in Oxfordshire, the fusion research arm of the UK Atomic Energy Authority (UKAEA). The Joint European Torus (JET) research projects is funded by the Engineering and Physical Sciences Research Council (EPSRC) and by the European Union under the Euratom treaty. European fusion research is following a roadmap to achieve power generation around the middle of this century (Figure 12.1).

Figure 12.1: European fusion road map



Beyond JET, the programme focusses on four main projects**:**

- ***ITER*** – a large multinational tokamak being built in the south of France. ITER aims to produce 500 megawatts of fusion power and to be an important step towards demonstrating the viability of fusion on a commercial scale, but has suffered many delays and not likely to be fully operational until at least 2035.
- ***A parallel technology programme*** to develop and test robust materials that can withstand the harsh environment expected inside a fusion power plant.
- ***DEMO*** – the EU's demonstration power station design – that aims to supply fusion electricity to the grid around 2050.
- ***STEP*** – a new UK power plant design activity based on the compact 'spherical tokamak' reactor concept, which aims to deliver net electric power output on a timescale of 2040s.

*Nuclear fusion has produced more energy than ever before in an experiment, bringing the world a step closer to the dream of limitless, clean power***.** The new world record was set at the UK-based JET laboratory. The experiments produced 69 mega joules of energy over five seconds. That is only enough energy for four to five hot baths - so not a lot. The JET facility was constructed in Culham in Oxford in the late 1970s and until the end of last year was the world's most advanced experimental fusion reactor. All experiments ceased in December 2023, and the future role of the UK in European fusion research has been unclear. Since Brexit, the UK has been locked out of the Euratom programme and last year the government made the decision not to re-join. Instead it said it would commit £650m to a national research programmes

12.3 Towards Fusion Energy October 2023: the next stage of the UK's fusion energy strategy – Department of Energy Security and Net Zero

In 2021, the UK published its first fusion energy strategy. This set out a vision for UK fusion that focussed not just on the UK's unique scientific and technical expertise, but also on commercialising that technology by developing a thriving UK fusion sector and collaborating internationally. The updated 2023 strategy gives details of the new programmes that will be put in place to secure the future of the UK fusion sector as part of Fusion Futures, the UK's alternative programme to Euratom R&T. It includes new capabilities, such as a new fusion fuel-cycle facility, enhanced support for fusion R&D and engineering firms, and dedicated funding to grow engineering and science skills. The three core areas of the Fusion Futures programme are:

Infrastructure

- Funding to develop further the UK's fusion cluster, providing infrastructure and facilities for fusion companies that want to be part of that growing community.
- Development of a new facility to support research and innovation in fusion fuels generation, to be used by public and private sector alike.

Skills

- Creation of a new Fusion Skills Centre that will work with universities, colleges and employers, to provide a pipeline of highly skilled scientists, engineers and technicians at all career levels, from apprentice to postdoctoral fellow.

Industrial and commercial opportunities

- An expansion of the Fusion Industry Programme providing a wider range of challenges across multiple technological approaches to fusion.
- The UK is open to finding new ways to collaborate and share expertise with ITER. Exploring the development of a UK fusion investment fund, working with potential investors to provide patient capital to the growing number of UK fusion firms and suppliers.

The Fusion Futures programme represents up to £650m of new investment, subject to business case approval, between now and 2027 on top of the existing fusion programmes. It sets out the evolution of the UKs approach to fusion energy. Having invested in creating a uniquely strong foundation in fusion R&D the government is now hoping to build the world's first fusion power plant in Nottinghamshire with operations beginning in the 2040s. A new nuclear body, the UK Industrial Fusion Solutions, will deliver the Spherical Tokamak for Energy Production (STEP) project.

The government shortlisted five sites for a prototype commercial nuclear fusion reactor plant and in late 2022 confirmed that it would be West Burton in Nottinghamshire. The site will replace West Burton A coal-fired station. The plant should be operational by the early 2040s, according to the UK Atomic Energy Authority (UKAEA), although there are still major technical and regulatory hurdles to overcome. It is difficult to speculate on likely local impacts. Compared to SMRs there may be more onsite construction and less scope initially for a modular approach, which could mean more opportunities for local and non-local employment impacts, but with associated impacts on transport, accommodation and other services. The location of the new national Fusion Skills Centre will also be significant. The lower radioactivity risk will have implications for site management. Nottinghamshire County Council see great potential for the future at West Burton: *"STEP will bring incredible benefits to the county and wider region, including millions, if not billions worth of investment, putting it at the heart of the government's plans to revolutionise the way we generate energy in the UK. The site will be the international hub for carbon-neutral, fusion development, attracting the brightest minds locally and from across the world, creating thousands of highly skilled jobs.*" (NCC Newsroom 20/10/23).

In May 2024, the Government issued a Consultation draft on a Fusion Energy National Planning Policy Statement ("FENPS") (DESNEZ, 2024), to provide a policy framework for the subsequent assessment of an actual fusion power station proposal as an NSIP under the 2008 Planning Act. This will be a new bespoke FENPS for the sector alongside the existing suite of energy NPSs. The draft FENPS promotes an open site policy which allow developers to identify, shortlist, assess, select and promote those sites which are best placed to meet the technical requirements of the specific fusion technology selected and potential cluster, and co-location. The draft NPS sets out a whole host of factors for consideration when siting a fusion station including, for example: flood risk, population densities, transport infrastructure, grid connection, biodiversity net gain, climate change, groundwater, proximity to civil aircraft movements, military activities and hazardous waste, and sites of ecological importance, cultural heritage and landscape value. **However – a considerable weakness in the**

draft is the failure to consider socio-economic impacts in their many dimensions. As our research has shown, the consideration of such impacts is crucial for major energy projects. New fusion will be no exception; indeed, such impacts and public perceptions are likely to have a very high profile for such a new technology.

Figure 12.2: A draft illustration of a fusion prototype power station



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13. Other Major Projects

13.1 Assessing and advising on the pipeline of major projects

Infrastructure and Planning Authority (IPA)

The IPA is part of the UK Cabinet Office and HM Treasury. It provides expertise in infrastructure financing, delivery and assurance of major projects to support more effective management and delivery across government. The IPA produces the National Infrastructure Delivery Plan (NIDP); this includes major infrastructure and construction schemes funded by the public and private sectors that exceed certain capital thresholds. It collates data from multiple sources to form the pipeline including the public sector, private sector and regulators. The pipeline is mainly for England and does not include devolved spending in Scotland, Wales and Northern Ireland and by Local Authorities. The 2023 pipeline included £379bn of planned investment, £164bn of which is scheduled to occur by 2024/25. Future government Spending Reviews will determine longer-term public investment, where it is not already committed. To enable the construction industry to have confidence in longer term strategic planning, the IPA uses data from previous years and its own assessment of current trends to provide a 10-year pipeline projection including planned and forecast spend. For the 2023 pipeline, this amounted to an estimated £700-775 bn. Despite the apparent strength of the planned pipeline, there is a challenging environment for infrastructure projects with a major growth in construction material prices of over 40% between 2020 and 2023, driven primarily by Russia's invasion of Ukraine and the COVID pandemic.

Delivery of the pipeline requires a significant workforce with the right skills and experience and IPA's assessment is that availability of labour, especially in relation to specific skills, is essential. Improving

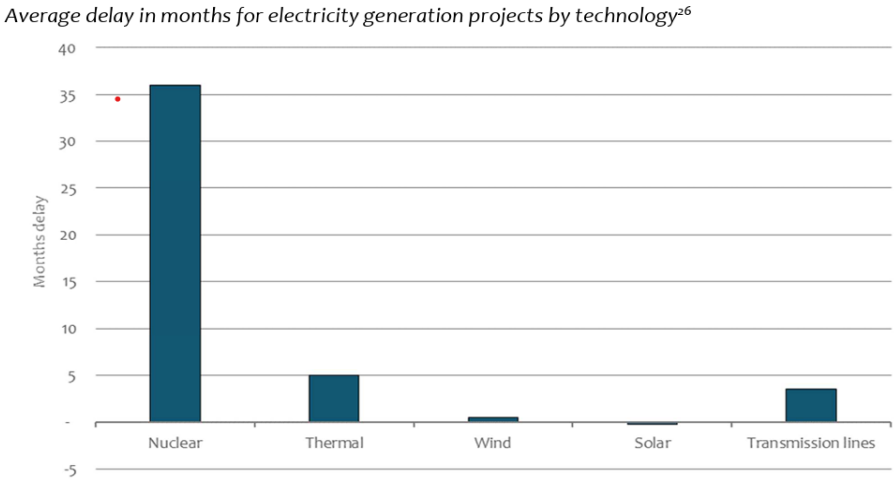
productivity will be an important factor to help manage delivery. The focus on sustainability, innovation and productivity is more important than ever given the highly challenging economic and delivery environment, impacts of climate change and the drive to Net Zero. IPA's flagship programme *Transforming Infrastructure Performance (TIP)* is reforming the design and delivery of government's infrastructure projects -- drawing a direct line between citizen benefits and impact on the built and natural environments. This step change in performance will be supported through application of the *Construction Playbook* (HMG 2022*)* provisions, project data analytics, modern construction methods including platform delivery, and other approaches that deliver greater sustainability and efficiency. IPA intends to embed TIP practices as Business as Usual by 2025.

National Infrastructure Commission (NIC)

The NIC provides the UK government with impartial, expert advice on major long-term infrastructure challenges, with the aims of supporting sustainable economic growth across all regions of the UK; improving competitiveness; and improving quality of life. The NIC produces a National Infrastructure Assessment once in every Parliament, setting out its assessment of long-term infrastructure needs with recommendations to the government. It also provides In-depth studies into the UK's most pressing infrastructure challenges, making recommendations to the government and monitors the government's progress in delivering infrastructure projects and programmes recommended by the NIC.

In July 2021, the government asked NIC for advice on whether an additional new nuclear plant, beyond Sizewell C project, was needed to deliver the sixth Carbon Budget. The NIC concluded that such a new plant was not necessary to achieve the rapid deployment of new low carbon capacity over the next 15 years. As noted in this report on HPC, nuclear projects are megaprojects; they take a long time to build and are highly complex. Moreover, because of the correlation between size of project and cost and delivery overruns nuclear projects often face the greatest challenges of all megaprojects. The median overrun for a PWR is 40%. Nuclear projects also face longer delays than other power projects globally. Having highly technical project needs, stringent regulatory requirements and public opposition are key contributors to nuclear time and cost overruns (Figure 13.1).

Figure 13.1: Average delays in types of energy projects



Note: Data for the chart is based on 401 electricity projects from around the world installed between 1936 and 2014.

Most electricity projects deliver more reliably than nuclear and the likelihood of a nuclear project delivery on time is not increasing. Since 1990, nuclear projects have faced significant delays all around the world. Even just in Europe, around half of all plants have faced at least a 50% delay in construction, and 1 in 4 plants have faced at least a 90% delay in construction. Notwithstanding such trends, the last and current UK governments are planning to build more nuclear reactors than comparable countries and committing to a third new large scale plant would make the UK a notable outlier. This raises the issue as to whether reform of the planning and assessment regulatory regime could help.

13.2 Potential reforms to the Nationally Significant Infrastructure Projects (NSIPs) regime

The NSIP process, introduced under the 2008 Planning Act, has been very successful, in many respects, in delivering decisions on a wide range of major projects, with energy projects being the largest group. However, over time there has been growing concern that the regime is in need of reform. Environmental Statements (ESs) have become voluminous, as have the number of issues examined in the process. Pre-application consultation has grown in length, government reviews of recommendations have also taken longer and there are more challenges to decisions. In addition, there has been increasing concern that the various sector policy frameworks set out in the National Planning Policy Statements (NPSs) are out of date. The government is taking steps to address wider systemic issues by updating and simplifying National Policy Statements, improving pre-application advice, building greater capability in planning authorities and the Planning Inspectorate and simplifying processes, including through introducing a “fast track” planning route for some infrastructure projects. More projects may also be included in the NSIPs regime under possible reforms by the new Labour Government, including perhaps major housing developments and onshore wind.

Additionally to such reforms, we should be learning from experience of what causes delays in project construction, and mismatches between project construction predictions and outcomes in practice. This has been the focus of this HPC research. The delivery of a decision on a project is only one-step on the road. In the spirit of adaptive assessment and management, monitoring and auditing of impacts are essential, and can lead to management responses that can speed up infrastructure delivery. This is relevant to all major projects and is discussed further in the final section of this report.

14. Overall Conclusions – Findings and Recommendations

14.1 Review of implementation of HPC Study 1 recommendations

The review of follow-up on the 2019 HPC Study 1 recommendations covers both gaps in the HPC monitoring organisation and in data sources. In summary, there is continuing good availability and continuity of data on many key impacts of the HPC project primarily through EDFE reporting via SEAG and TRG, and through the various community fora. However, on some 2019 recommendations progress appears more mixed. For example whilst there appears to be some progress on the organisation of the monitoring of accommodation and environmental monitoring, there is still little publicly available environmental data. There are also continuing limitations on the availability of disaggregated employment information from the six-monthly Workforce Surveys. Administrative

issues, including the reorganisation of the Somerset authorities, initially delayed the public availability of data, but these now appear to be largely resolved.

14.2 Refresh of HPC Sector Impacts for HPC Peak Construction

This is the main section of the report. The refresh of the HPC Sector Impact Indicators uses the same three- step approach as in the early construction impacts HPC Study 1: impact identification, assembly of monitoring information for key indicators/KPIs and auditing of findings against targets. As for the initial 2019 HPC Study 1, this new peak construction study is also based on information and data that is already or can be made publicly available, to maximise its credibility and to allow NNLAG to make the study publicly available and utilise it as evidence in support of consultation responses/ evidence at examination for other projects. The main sources of such data for the refresh are again the quarterly reports of SEAG and TRG, plus the Minutes of the various community fora (Community, Site and Transport). The peak construction period to date, as defined by workforce numbers was the 2023-2024 period, although the peak is likely to run for longer, and probably even higher, for several more years. As for the first study, the main spatial scope of the local impacts assessment is the 90 minutes commuting time CDCZ (Construction Development Commuting Zone), and various local authority areas – although the various Somerset districts merged in the April 2023 reorganisation into Somerset Council.

An additional complexity to this study has been a major review, 2019-2022, by EDFE of the likely size of the peak construction workforce and associated socio-economic indicators (Uplift 1). This revealed that in order to maintain safety and quality standards and the construction programme, there was a need to increase the peak number of workers on site from 5,600 to 8,600**.** EDFE produced a set of six Uplift Topic Papers, covering the various sectors, to assess the local impacts of this uplift. The various uplift papers are built into each of the report's sector refresh study; in some cases, there are revised indicator targets. There was a further complexity in 2024 with work by EDF on another uplift plan (Uplift 2) that is likely to increase peak employment to over 12,000, with additional mitigations on the anticipated changes in accommodation, transport, health and other impacts. The detailed papers underpinning Uplift 2 were not publicly available at the time of this report and there is only limited coverage of possible impact implications.

The audited findings of the 2023-2024 peak period impacts have a similar overall pattern to those of the early construction stage, but with some changes of note as follows:

- *Economic Development:* good performance against many indicators including local employment content, training and education, apprenticeships, jobs brokerage, local supply chain inputs and tourism. Mitigation and enhancement measures also appear to be working well, including the very significant maintaining of the local content percentage as total numbers rise fast. Yet, on the other hand, the Uplift 1 construction totals are badly out after only a very short period after the new predictions.
- *Accommodation:* findings on the spatial distribution of both NHB and HB workforce appear improved against predictions, compared with the early construction stage. There is still some skew in the tenure mix towards PRS, but the increase in campus provision has been significant. The housing support strategy, and the resultant delivery of bedspaces, appear to be working well.
- *Social and Community:* continuation of good performance against many of the impact indicators. For health, the staffing growth of the on-site Medical Campus has supported well the growth in workforce. For community safety, mitigation measures, including the Worker's Code of Conduct appear to be working well in controlling crime, relative to workforce numbers. There are some possible issues with schoolchildren numbers becoming much higher than the original predictions.

- *Transport:* There is a continuation into the peak period of good performance against predictions for many transport indicators, including workforce journey by bus to the main site, and the freight Delivery Management System. More mitigation measures, including the jetty and more P&R sites, are also now in place. Less positively, the car share system to P&R sites continues to be less effective than predicted, and there is the continuing issue of fly parking.
- *Biophysical and Environmental Health:* It is good to see a new set of KPIs to be reported to a new Environmental Monitoring Group. However, as for the earlier study, the topics addressed in this section still lack the detailed publicly available impact data to complete an audit. It must be assumed that HPC environmental impacts are well regulated with monitoring mainly related.to any exceedances of standards and thresholds. However, there may be a need for additional monitoring in relation to potential impacts of a currently proposed material change.

A number of factors influence such findings, some positively, others less so, as briefly noted here:

- *Positive factors* include the implementation of the transformational array of skill training measures, accommodation campus developments (including the Medical Centre), P&R and the site bus service, Workers Code of Conduct and community safety initiatives, and the implementation of many management plans and EDFE funding initiatives (including for housing and community impact mitigation).
- *Factors that are more negative* include the failure of Uplift 1 to anticipate the scale of the overlap between the Civils and Mechanical and Electrical phases of construction and the MEH worker requirements for future years. Monitoring and reporting of some impacts, especially some disaggregated workforce details and environmental impacts are sparse. The definitions of some indicators, especially '*what is a worker'*, has been under debate.

14.3 Relevance for Other Studies

Sizewell C and other NNB

The Suffolk local authorities' Local Impact Report made particularly good use of the findings of the 2019 HPC Study 1 as a basis for supporting arguments in the SZC examination and in recommendations and conditions in the SZC DCO. The Examining Authority also noted the importance of impacts monitoring for the SZC project, as developed in the DCO Requirements and Conditions, in various project construction Management Plans, and in the Planning Statement. These include, for example, referencing to the monitoring organisation, including the establishment of the SEAG and its various sub-groups, and to the key regular Workforce Surveys. Both the early study and this current study raise further considerations for the project governance and monitoring of the SZC construction stage, such as: the need to revisit the SZC peak workforce predictions and to clarify the nature of an overall construction stage-monitoring plan. Others for example include the scope for independent auditing of project impacts; and the level of target for some indicators (e.g aiming higher still on local apprenticeships, female employment and skill training provision). Such findings are also relevant for other NNB, which may initially be for Wylfa on Anglesey.

Small Modular Reactors (SMRs)

There is considerable interest in SMRs as part of the future UK energy mix, and as a possible complement and/or substitute for large nuclear reactors (LRs) such as HPC and SZC. They have many claimed advantages, but also potential disadvantages compared with LRs. A standardised design outcome will help progress, and offset some cost/time and risk concerns, although this is

unlikely to be a quick fix to net zero. Renewables (especially on - and off - shore wind, and solar) will be very much needed to help deliver a timely energy transition. Most impact literature on SMRs has focused to date on risk and safety issues. There seems to have been little work on other impacts, social acceptance, and community capacity issues. Whilst the nature of environmental impacts originating from SMRs or LRs may not differ greatly, and our findings are relevant, it is likely that there will be differences in magnitude. UK government consultation on new nuclear NPSs beyond 2025 might provide the opportunity to include a more streamlined regulatory process and tests (e.g EN-6 lite) that could apply to SMRs and other advanced nuclear projects that are smaller in scale and impacts compared to the LR projects. It may also lead to some opening up of more potential nuclear power locations from the present eight named sites, but this should not weaken the consideration of essential biophysical and socio-economic impacts considerations.

Nuclear Fusion Projects

Operational nuclear fusion power station projects are much further in the distance in terms of contributing to the UK energy mix. However, the UK government is committed to building on the pioneering JET project research and in its latest 2023 strategy has set out a vision for UK fusion that is focussed not just on the UK's unique scientific and technical expertise, but also on commercialising that technology by developing a thriving UK fusion sector. The government has chosen West Burton in Nottinghamshire as the initial fusion power site. The government is also consulting on an NPS for fusion energy. The draft FENPS promotes an open site policy that allows developers to identify, shortlist, assess, select and promote those sites which are best placed to meet the technical requirements of the specific fusion technology selected. It sets out a whole host of factors for consideration when siting a fusion station including, for example: flood risk, population densities, transport infrastructure and grid connection, but it currently fails to consider socio-economic impacts. As our research has shown, the consideration of such impacts is crucial for major energy projects, and new fusion will not be an exception.

14.4 Generic recommendations

These generic recommendations focus on the theme of this research -- that for an effective and efficient adaptive approach to impact assessment, good monitoring of actual impacts and auditing of these against predicted impacts are essential. Flowing from this, the research report recommends:

Preliminaries

- A monitoring and auditing framework covering key socio-economic and biophysical indicators should be an integral, clear and easily identifiable element in each of the project Environmental Statement, Development Consent Order and in S106 agreements (as appropriate).
- In addition to covering socio-economic and biophysical impacts, it should cover key stages in the lifecycle of the project, and not just focus on peak construction.
- A clear set of KPIs agreed pre-application (primarily between the developer and local authorities) and easily located in the documentation, provide the essential first step to monitoring and auditing. It is important that key definitional questions, such as 'what is a worker,' are addressed at an early stage.

Responsibilities

- Monitoring is a prime responsibility of the developer, in association with the local authorities, the community, and other relevant agencies and formal data sharing agreements are recommended.

- Quantitative data should be collected on a consistent basis; there is a need to avoid potential bias in content from proponent–led data, and use should be made of community stakeholder knowledge and opinions, which may be qualitative in content.
- An independent body preferably provides the auditing of the monitoring information against predictions. Such auditing can provide a valuable check on findings and a neutral position between the various agencies involved in the project.

Managing and resourcing

- All monitoring and auditing information should be publicly available, and 'published' on a regular basis in an agreed online format based on the initial monitoring and auditing framework. Annual Monitoring and Auditing reports are recommended.
- A rigorous approach to monitoring and auditing, involving primary information collection, can be resource intensive. A monitoring light and proportionate approach, using publicly available data and focusing on significant impacts, as in this latest HPC study, can provide a useful way forward, given developer and local authority co-operation.
- Findings from monitoring and auditing can provide the building blocks for any additional impact mitigation and enhancement measures, and updating of predictions in an adaptive assessment and management approach.
- Monitoring and auditing reports provide a vital resource for future major project developments in all their various sectors. There should be a repository for such reports (PINs re NSIPs—although recent activity not encouraging?)

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APPENDIX C – Review of Tourist Accommodation Assessment (Sea Link NSIP) by FORWARD LAND & HOTEL SOLUTIONS (February 2026)

Review of Tourist Accommodation Assessment (Sea Link NSIP)

by

FORWARD LAND & HOTEL SOLUTIONS

February 2026

1. Introduction And Consultant Background

Forward Land is part of a team of specialist tourist accommodation consultants lead by Hotel Solutions that have been engaged by East Suffolk Council (ESC) to prepare a hotel and visitor accommodation study for the District. This includes consideration of baseline accommodation provision, performance levels, assessment of the strategies and policies, forecasting future demand and setting out strategies and plans to aid in the delivery of accommodation as required. This scope includes consideration of potential impacts associated with the Sizewell C (SZC) project on the availability and functioning of local accommodation provision.

The team combines specialist expertise in hotel and non-serviced visitor accommodation market analysis, tourism and planning strategic reviews and accommodation development. The team has carried out over 200 studies for regions, local authorities and districts across the UK and are regarded as one of the leading independent tourist accommodation advisors.

The team has been asked by East Suffolk Council (ESC) to support the Council in reviewing the Sea Link NSIP application submissions insofar as they relate to potential impacts on tourist accommodation and visitor accommodation capacity, including the extent to which construction workforces may utilise local accommodation stock and the potential for displacement effects.

2. Scope of Review

This statement provides a professional appraisal of the applicant's submitted material relating to tourist accommodation impacts, focusing on the following documents:

- Environmental Statement (ES) Volume 6, Document 6.2.2.10 (B), Part 2 Suffolk, Chapter 10: Socio-Economics, Recreation and Tourism. PINS Reference: [REP1A-005]
- Volume 9 Examination Submissions, Document 9.40 (A): Visitor and Tourism Assessment Technical Note - Suffolk (January 2026). PINS Reference: [REP3-065]

3. Summary of applicant position

The applicant concludes that sufficient accommodation capacity exists within a 60-minute drive time catchment to accommodate the construction workforce that is likely to require accommodation without giving rise to significant adverse effects on tourist accommodation availability or the wider visitor economy. The applicant further concludes that cumulative effects with other NSIP schemes are unlikely to be significant.

4. Notable Observations

4.1 Lack of transparency regarding accommodation supply baseline

The ES refers to an accommodation inventory within the 60-minute drive time catchment area; however, there is insufficient explanation of the source data, compilation methodology, inclusion/exclusion criteria, and whether

the inventory includes only serviced accommodation or also non-serviced/holiday accommodation. This naturally limits auditability and confidence in the conclusions drawn.

Our findings, using the latest available data (2024/5) from industry sources, at the time of our study we showed that there are 249 serviced establishments (Hotels, Venues, Pubs & Inns and Bed & Breakfasts) with 4,221 rooms in the 60-minute travel zone. This contrasts sharply with the 7,038 tourist accommodation "inventory rooms" in local hotels, bed & breakfasts and Inns as reported in the ES, seemingly in 2023. The ES number does correspond more closely with the number of Hotel only (excluding Pubs and Inns and Bed & Breakfast establishments) Bedspaces that we have recorded which was 6,550 in 2024. Note this was bedspaces not rooms which would significantly alter the assumptions as projects such as SZC do not forecast that their non-home based workforce to share bedrooms.

4.2 Reliance on national occupancy rates applied to Suffolk

The assessment references VisitEngland 2023 seasonal occupancy rates and appears to apply an England-wide availability assumption to Suffolk. In our view, Suffolk's visitor economy characteristics, including its coastal and rural tourism profile, warrant the use of Suffolk-specific evidence or a justified adjustment.

There is limited justification for selecting July as the peak constraint month and no sensitivity testing against other peak or shoulder periods. Our findings in East Suffolk specifically, are that the months of August and September show greater occupancy levels and would therefore be a more stringent baseline against which to test the existing availability of accommodation.

4.3 No consideration of affordability and market segmentation

The assessment treats numerical room availability as practical availability. It does not consider affordability, price inflation effects, suitability of accommodation for long-stay construction workers, or the likelihood of displacement where tourism demand competes for the same stock during peak season.

4.4 Insufficient evidence for local workforce sourcing assumptions

The applicant assumes that 30% of the workforce could be sourced locally and therefore would not require overnight accommodation. This materially affects demand estimates but is not supported by a local labour market or skills availability analysis.

The ES also does not appear to consider the availability of such a local workforce, recognising the other NSIPs, notably SZC, that are already under construction.

4.5 No sensitivity analysis or forward projection to 2028

The assessment applies 2023 occupancy assumptions across the year to 2028 peak construction scenarios without clear allowance for tourism growth, accommodation supply changes, or broader market shifts. No sensitivity testing is presented to demonstrate the resilience of conclusions under alternative assumptions.

4.6 Limited treatment of planning restrictions on accommodation use

The assessment does not address whether accommodation stock assumed to be available can lawfully be used for construction workers, particularly where holiday accommodation is subject to restrictive planning conditions linked to duration and nature of stay.

5. Cumulative Impacts

The Technical Note introduces private rented accommodation into the cumulative assessment. While this may be relevant, the basis for estimating private rental availability is unclear, and affordability/displacement impacts are not assessed. The calculation trail supporting the headline cumulative capacity conclusions is not sufficiently transparent for audit.

6. Recommendations / information requested

We recommend that ESDC seek clarification and/or further evidence from the applicant on:

- Full methodology and data sources underpinning the accommodation inventory baseline.
- Suffolk-specific seasonal occupancy/availability evidence and justification for the peak month selection.
- Sensitivity testing including growth scenarios and alternative occupancy assumptions for 2028.
- Affordability and displacement assessment, including market segmentation and price impacts.
- Evidence supporting local workforce sourcing assumptions (skills/labour market assessment).
- A clear cumulative calculation table and reconciliation of all component figures.
- Confirmation that accommodation assumed to be available can legally be used for construction workers.

7. Conclusion

Whilst the applicant has sought to demonstrate that accommodation capacity is sufficient, the evidence base is undermined by a lack of transparency, reliance on generalised assumptions, and limited local market grounding. Given East Suffolk's tourism sensitivity and the potential for cumulative construction demand, we do not consider the submitted accommodation assessment sufficiently robust to support a conclusion of no adverse effects without further clarification and evidence. We would recommend that any decisions be deferring pending the presentation of more detailed information to allow more thorough appraisals.

Prepared for: **East Suffolk Council**
Prepared by: Adam Gough, **Director,** Forward Land
Reviewed by: Lynn Thomason, **Director,** Hotel Solutions
Date: **3rd February 2026**

APPENDIX D – The de Bois Review: an independent review of Destination Management Organisations in England (Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1011664/2585-C_The_de_Bois_Review_ACCESSIBLE__for_publication_.pdf)



Department for
Digital, Culture,
Media & Sport

The de Bois Review: an independent review of Destination Management Organisations in England

Nick de Bois

August 2021

We can also provide documents to meet the specific requirements for people with disabilities. Please email enquires@dcms.gov.uk

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Foreword by Nick de Bois



England has an outstanding tourism offer. Extraordinary, beautiful landscapes, some of the world's most renowned historic monuments, buildings and places, stunning stretches of coastline and inland waterways plus of course our dynamic bustling cities and towns. We can rightly boast some of the finest museums in the world, the most historic universities and an eclectic choice of tourist attractions and events right across the nation.

It is no wonder that England is such a popular destination – attracting 99 million domestic overnight visitors a year before the pandemic, with London the third most visited city on the planet and 41 million visitors coming to the UK in 2019. These numbers translate into a huge number of jobs – there are 4 million jobs across the UK directly or indirectly dependent on tourism – not to mention lasting memories and great experiences.

None of these figures mean we should rest on our laurels, however, because they disguise an untapped potential which I will come on to explain. Furthermore, we all know that it has been quite a different story over the last 18 months with tourism one of the hardest hit of all economic sectors by the pandemic. The sector now has a long road to recovery ahead and this recovery will depend, in part, on the prevailing pandemic conditions but also on having the right structures and partnerships in place to drive that recovery forward.

'A good DMO is the glue which brings together the huge array of parties together in an area that make up its visitor economy'

It is those structures that this review set out to examine – with a focus on Destination Management Organisations, or 'DMOs' for short.

About DMOs

Let's face it, most people outside the tourism sector have no idea what a DMO is or what they do.

It is perhaps best to think of DMOs as local or regional tourist boards built around a visitor destination such as a town, city or county. That destination usually gets built into their name – Visit X, or Marketing Y. When you are planning a trip and looking for things to do, it is usually the DMO's website that you turn to, whether you know they are a DMO or not. When you see an advert on your Twitter feed, on the underground or in the paper telling you to visit such and such county or city, it is usually a DMO that produced it.

Yet when a DMO is performing at its best, it is not just doing marketing and promotion. It is undertaking a wide range of effective activities that combine to ensure their destination remains sustainable, competitive and compelling. This will include marketing, but also activities such as providing advice to businesses on new regulations, skills programmes or grant funding opportunities, going after inward investment, creating new travel itineraries and products in conjunction with transport companies or bringing together players to create a compelling bid package for a major event. A good

DMO is the glue which brings together the huge array of parties together in an area that make up its visitor economy.

DMOs are found in almost every nation and region the world over. Why? Because they respond to a market failure. Tourism businesses want DMOs because they understand that the tourism sector is an ecosystem and that the success of each individual business is intrinsically linked to the success of the destination as a whole. That's why they pool resources to fund a DMO. Consumers don't travel to the Lake District just to stay in a hotel – they come for its brilliant food offer, the amazing landscape and the heritage as well – and they are not going to come back if the food is bad, the landscapes poorly maintained or the attractions boring. Nor are they going to go at all if they've never heard of the Lake District. It is a DMO type organisation that is best placed to stitch the destination together, keep it competitive and present it to the world.

'It is a DMO type organisation that is best placed to stitch the destination together, keep it competitive and present it to the world'

In England, however, our DMOs are not structured, funded or supported in a way that allows them to maximise their potential. There are some exceptions to this, but when looked at together they are performing sub-optimally. If this continues it will mean slower recovery, slower growth and unfulfilled potential.

About the review

This review was commissioned by the DCMS Secretary of State and the Tourism Minister in March 2021. I was instructed to think comprehensively and boldly about the recovery and future of the visitor economy and the role of DMOs within that.

Leading this review has been an honour because everyone I've engaged with has been so passionate, committed and informed, and I have spoken to a huge and diverse range of people over the last five months. It was important for me to engage widely, because I wanted to get a full appraisal of the actions, impact, strengths, weaknesses and potential of England's DMOs. That meant speaking with attractions, National Landscapes, Local Authorities, representatives from our historic buildings, coastal towns, consumer and business event organisers, small businesses and large corporations, to name a few, and of course DMOs themselves.

'There is fragmentation across the landscape, as well as geographical overlap, duplication, distorted priorities and competition when there should be alignment.'

What were the key messages?

First, everyone recognised the need for DMOs. They are a crucial part of the tourism ecosystem and are not going away. Many English DMOs do great work, and add a lot of value, but this is not consistent across the board and is despite the Government, not because of it.

Second, the current landscape in England is a complicated patchwork quilt, with each DMO managed and led in different ways. They can be limited companies, a team in a Local Authority, a Business Investment District, or a Community Interest Company. Their funding models are also diverse and often opaque – some entirely private, some entirely public, some a mix of the two. There is fragmentation across the landscape, as well as geographical overlap, duplication, distorted priorities and competition when there should be alignment. Whilst a bit of variation is fine, the unstructured nature of the landscape is ultimately hard to get your head around. There was an overriding call throughout the review and from all parties for a degree of coherence. Everyone wanted a simplified structure with clear channels of communication between DMOs and national Government, a clear definition as to what a DMO is and what it should do and a common understanding of expectations, roles and priorities.

Third, funding is a big problem. The pandemic has led to a huge drop in commercial revenues, but this comes against the backdrop of a decade of funding being withdrawn by the public sector starting in 2012 when the government somewhat brutally cut loose DMOs from core grant funding via the old Regional Development Agencies. The DMO response was resourceful and they looked elsewhere for money by becoming more commercially minded and reliant on private sector membership. In some senses this is a good thing, but it has also meant DMOs focusing inwards on the marketing desires of their members and has led to a huge amount of time spent constantly chasing for money.

The funding situation also means England's DMOs are not really in a position to support the Government to deliver its tourism policies or to carry out the full suite of activities needed to keep a destination sustainable and competitive. It has become somewhat like an elasticated bungee run – with the resources they have DMOs can get so far but never quite to the end of the run because they always pinged back to marketing. Place-shaping, having a seat at the table on investment decisions, supporting bids for major events, developing a destination strategy – all vital elements of destination development – are just out of reach. I contend that with some core government support we can help strategic, well led DMOs complete the "run" and dramatically improve the growth of regional tourism as a result.

'There was an overriding call throughout the review and from all parties for a degree of coherence'

Fourth, England's DMOs do not regularly have a seat at the table when it comes to decisions by key place-shaping decision-making bodies. Their voice is often unheard and unrepresented because of the fragmented and confusing structures, and the distorted priorities of DMOs themselves.

There were more findings too, and there is a lot of nuance to explore and understand, but these were the key points for me. My report sets out 12 recommendations for improving the DMO landscape in England.

The way forward

The key recommendations are for the Government. Currently the Government is sitting on its hands when it needs to get stuck in. England is relatively unique in how 'hands-off' the Government is with destination management at a subnational level. International best practice points towards a top tier network of DMOs operating at regional scale, built around destinations that make sense to the consumer and in receipt of reliable funding from the Government to serve as a foundation or springboard from which the world is then their oyster.

'Funding is a big problem and it means England's DMOs are not in a position to support the Government to deliver its tourism priorities'

That's why I have proposed a new simplified tiering structure, which would create a national portfolio of high performing DMOs, able to receive core funding from the central Government if certain criteria are met. These DMOs would then be accountable for what they deliver. I am acutely conscious that by asking for government support from the taxpayer, there must be a return on investment and stringent accountability for how it is spent. In return I am asking the government to give DMOs the tools to do the job they are best placed to do.

This need not cost the Government much in the grand scheme of things. I would estimate it costing somewhere in the region of £15m to £20m per year, based on my conversations with DMOs during the review. The Government is set to spend many multiples of this on tourism infrastructure through the £4.8bn Levelling Up Fund (not to mention the Towns Fund and the Getting Building Fund), so my proposals are not even 0.1% of that Levelling Up Fund cost. Yet the benefits could be substantial. Just a 1% increase in the value of tourism above its pre-COVID contribution would be worth

£745m to the economy each year and a super-charged DMO network operating on firm foundations is more than capable of that.

I am acutely aware that government intervention done badly can do more harm than good. Unintentionally, changes could exacerbate existing issues, or create new ones, if mis-handled. It is absolutely vital that the diversity and breadth of England's offer is recognised as a fundamental strength and, just as is the case with the Government's thinking on levelling up, imposing a uniform one-size-fits-all solution that treats every destination as having the same needs would be a catastrophic mistake. Of equal importance is that changes must not be looked at through the eyes of Whitehall or the Town Hall. The consumer should come first.

'Imposing a uniform one-size-fits-all solution that treats every destination as having the same needs would be a catastrophic mistake'

The challenge for DMOs is to accept the urgent need for coherence to their operating landscape and embrace a rationalised structure where there has been none before, and accreditation where none exists. My review takes a long hard look at what is expected from our DMOs and inevitably this will involve change. For some that may be uncomfortable, but not to collaborate or join together will mean potential unfulfilled.

The opportunity at stake

This review comes at a time when the Prime Minister has challenged all of us to propose ideas and solutions to level up opportunity and prosperity in every part of the country. His recent Levelling Up speech on the 15th July[1] could have been written with the tourism sector and this review in mind, when he said: "There is no place in the country that does not have something special, some selling point" and when he made the point that "all they need is the right people to believe in them to lead them and to invest in them and for government to get behind them". My recommendations do precisely that. The tourism industry is ready to take up the challenge. Most of the building blocks are already in place – fantastic committed local leadership with a passion for their destination, strong 'attack brands' and a compelling visitor offer across England, and an array of DMOs who have shown good promise with respect to working in partnership with public, private and community interests in their destination as well as with each other. What's missing is a coherent, sustainable, robust and accountable structure that can give DMOs time, space and a clear direction, and the ability to perform consistently from a firm foundation.

'It's time for the Government to put in place a super-charged DMO network capable of unleashing the potential of England's many powerful attack brands'

For me, potential unfilled is the story of English tourism over the last decade with the Government frankly operating on the lazy assumption that tourism can look after itself and is doing just fine. The pandemic has certainly played its part in exposing this assumption, and I am glad to see the recently published Tourism Recovery Plan set out bold targets and a clear framework for a swift recovery. However, it's now time for the Government to put its money where its mouth is, and put in place a super-charged DMO network capable of unleashing the potential of England's many powerful attack brands.

Furthermore, it's time for the Government to realise the potential of this sector. Doubling visitor numbers in England between 2010 and 2020 might seem good but frankly we could have exceeded that in both quality of spend and quantity of visitors. Over that period our tourism sector grew slower than the world average and we lost market share. With all that England has to offer it should not be acceptable to see France continue getting double the number of international visitors, and for the UK to have only one city in the top 100 most visited global cities.

[1] https://www.gov.uk/government/speeches/the-prime-ministers-levelling-up-speech-15-july-2021

'If the Government is fine with England staying in Tourism's equivalent of League 1, with a declining market share and unfulfilled potential then it should do nothing and continue leaving DMOs largely to their own devices'

The Prime Minister has said levelling-up is about 'heating up' all our regions so they are performing at their potential. DMOs are ideally placed to achieve this for tourism, and there is huge scope for growth. If we can get structural reform right there is huge potential for this sector to become more productive and play its full role in placemaking and economic regeneration.

And it is not just England which will benefit. Although Tourism is a devolved responsibility, a stronger English landscape will be a good thing for tourism businesses and organisations in Wales and Scotland keen to work on cross-border collaboration. There would also be Barnett consequentials from increased investment in England.

If the Government is fine with England staying in Tourism's equivalent of League 1, with a declining market share and unfulfilled potential then it should do nothing and continue leaving DMOs largely to their own devices.

But if it wants to level this sector up to the Premier League, then it is time to abandon the last decade of a "hands off' approach to tourism. Now is the time to introduce a new era of policy engagement and delivery, working with the successful public private partnership that our DMOs can be, charging them with the strategic role our cities, regions and counties require to deliver the growth and levelling up government seeks.

Nick de Bois
August 2021

Executive Summary and Recommendations

What I was asked to do

1. In March, I was asked by the Secretary of State for Digital, Culture, Media and Sport, Oliver Dowden, and the Minister for Sport and Tourism, Nigel Huddleston, to conduct a root and branch review of the Destination Management Organisation (DMO) landscape in England.

2. My terms of reference were clear. First, build up a picture of the current landscape, and set that in an historical and international context. Second, appraise the landscape, in particular work out the extent to which it is economically efficient, effective and sustainable, assess whether or not it is maximising its potential to support delivery of the Government's tourism policy agenda with respect to England and assess if it is sufficiently integrated with the wider local and regional economic landscape (i.e. Local Authorities, Local Enterprise Partnerships and so forth). Third, make recommendations to fix any deficiencies I found.

3. As for why I was asked to undertake the review, I think that was also clear. **For many years, DMOs had been raising concerns with the Government about their financial stability and almost every player in the tourism sector had been crying out for a rationalisation of the landscape.** The COVID-19 pandemic only made the case for a review more urgent, with the knock-on impact of pandemic restrictions causing massive reductions to DMO commercial revenue streams at the very time tourism businesses needed their support most.

4. **In my first meeting with him, the Tourism Minister explained that now was the time – with recovery on the horizon and the sector hit harder than ever before in its history – to think comprehensively and boldly about the future of the visitor economy and the role of DMOs within that.**

How I conducted the review

5. Given the immediate challenges presented to the tourism sector by COVID-19, the timeframe given to me was short – five months – but within that timeframe I sought to engage as wide and diverse a set of stakeholders as possible within the constraints imposed by the ongoing pandemic. I've met with many, both in virtual one-to-one meetings and through in-person roundtables up and down the country. I've also conducted what I believe to be the largest, most detailed survey of DMOs ever undertaken in England and a written consultation, open to anyone, which received 340 substantive responses.

6. As a result, I was able to work from a comprehensive evidence base. To assist me in making sense of it, and to act as a sounding board for developing recommendations, I set up a Challenge Panel of experts from across the tourism sector and beyond. I am grateful for their assistance throughout the review process and have provided further detail on Challenge Panel membership in the Annexes.

A note on terminology

7. **It became apparent to me almost straight away that the acronym 'DMO' means different things to different people.** The key distinction is what the 'M' stands for, with some saying 'Management' and some 'Marketing.' Not every DMO is a Destination 'Management' Organisation, despite what it

might have said in my Terms of Reference and despite the overall name of the review. As such, I sought to look at the structure and funding of tourism at a regional and local level in the round rather than be constrained by a focus on 'Management'. When I use the acronym 'DMO' in this report, I use it to mean both Management and Marketing, i.e. to cover all types of DMO or organisations engaging in DMO type activities. When I want to refer specifically to 'Management' or 'Marketing', i.e. when exploring the differences between the two, I deliberately spell out the acronym using the appropriate word.

My findings

8. First and foremost – I found that DMOs are here to stay. They are found in every region and destination in the world with a developed tourism industry, and with good reason. **They respond to a *well documented* market failure.** Tourism businesses want them, because they understand fundamentally that tourism is an ecosystem and that their own business success is intrinsically linked to the success of the destination as a whole. They also understand that a DMO type organisation is best placed to manage and grow the destination, ensuring it remains competitive and sustainable. The question of whether or not they should exist is ultimately moot. **The key questions are therefore – what does a high-performing DMO deliver, under what conditions does that arise and what is the role of the Government in creating and maintaining those conditions?**

9. **For me, a high performing DMO should do the following. It:**

- Is actively involved in destination management, not just marketing.
- Is built around the consumer rather than administrative boundaries set by the Government (although it is helpful when these align).
- Covers a geographic area with a tourism offer that comes together as a compelling and competitive brand.
- Has a clear strategic, long-term vision for how to develop the destination in line with its key strengths, so it remains competitive and sustainable.
- Acts as the 'broker' and/or 'convener' for the tourism sector in the area covered. DMOs should be true partnerships between public, private and community organisations.
- Is a strong and trusted advocate for the tourism sector, bringing relevant stakeholders with them, with a seat at the table when it comes to major decisions about transport, inward investment and so forth, and able to marshal evidence to illustrate the situation on the ground and the impact of visitor spending.
- Should be well integrated with the country's overall tourism strategy, and have the capacity to deliver grant-funding projects on behalf of central Government if required;
- Should be outcome-focused and financially sustainable, not continually fighting for survival or serving as a vehicle to boost individual egos.
- Undertakes activities that match the development needs of their destination, ensuring it remains sustainable and competitive. This will vary from DMO to DMO and, yes, it almost always involves marketing but that is not the be all and end all. Getting visitors to a destination is just one aspect of developing a competitive and sustainable visitor economy.

10. When DMOs are performing consistently at this level it adds a significant amount that no one other body is able to provide. Consumers will know the destination exists, that it presents a compelling and cohesive offer and they will be more likely to have a great experience when they visit. If they don't, the destination will be able to collect evidence to know about it and implement a fix. Tourism businesses will have skilled staff capable of serving consumer needs and will have up to date evidence on how they need to innovate and adapt to ensure the destination remains competitive. Investors will be more inclined to look at the destination as an opportunity and the local community will embrace the opportunities presented by the visitor pound. More visitors come, they will be incentivised to stay longer and spend more, more jobs are created and prosperity flows.

11. **Local Authorities cannot achieve all this, with their artificial boundaries that make little sense to the consumer and their poor connections with tourism businesses.** Local Enterprise Partnerships can't either, as they lack policy levers to affect change and again, don't match up well with consumer understanding. Businesses alone can't do it either – why would they go solo in promoting their destination when their rivals might stand to benefit? **It is a DMO type organisation that is needed to stitch it all together.**

12. Yet did I find that DMOs across England were all consistently performing at the optimal standard? Unfortunately not, although there were plenty of examples of good practice and some DMOs are certainly closer than others to excelling.

13. There's a lot that England's DMOs do well. They are staffed by passionate and well informed staff, who are able to articulate what makes their destination special. They are often able to act as conduits of information from businesses to the public sector and vice versa. Many regularly and competently administer grant funding on behalf of the public sector – £500,000 over the last three years on average per DMO.[2] Lots have the trust of the private sector, and there is no better evidence of that than their continued existence over the last decade despite the withdrawal of funding from public sector sources. Much of the evidence I collected pointed to the best Destination Management Organisations acting as the 'glue' bringing together the vast range of parties that collectively have a stake in the visitor economy.

14. **Despite this, the current DMO landscape in England is ultimately sub-optimal and for a number of fundamental, structural reasons is held back from achieving its full potential.** No-one would have designed what we have now. The following are particular issues:

- **Variation:** There is too much of it – in terms of structure, geography, size, model and performance – to the point where the landscape appears incoherent to those from the outside looking in. For example, there's at least 46 DMOs in the South East, of all shapes and sizes, from 'Tourism South East' down to 'Destination Basingstoke'. **This variation creates confusion among policy makers at all levels of Government, and amongst businesses and consumers, ultimately causing them not to engage with DMOs.** Furthermore, the inconsistency makes it difficult for the Government to look at the DMO network as a natural and reliable delivery partner, especially if it wants to deliver on a consistent basis across the country.
- **Fragmentation:** There is an excessive amount of geographical overlap and territorial competition, leading to missed opportunities around economies of scale. For example, why does Devon have a Visit Devon, a Visit Dartmoor, a Visit Exmoor, a Visit South Devon, a Visit Totnes, Destination Plymouth as well as Exeter City Council getting involved? **There are too many DMOs, to be frank, and not enough doing destination management.** No mechanism exists for bringing the fragments together, sharing best practice or evaluating performance consistently. The fragmentation leads to a diminished voice for the visitor economy overall and exacerbates low awareness internationally of all the brilliant tourism offerings across England.
- **Funding:** Reliable Government funding has all but evaporated over the last decade – Local Authorities spent £127m less on tourism in 2017-18 than in 2009-10. Whilst this has forced DMOs to become more commercially savvy organisations (a good thing in the main) it has also meant that DMO staff spend too much of their time chasing membership income (some have half their staff devoted to it!) and not delivering the full suite of strategic activities that make for good destination management. Over-reliance on membership fees also acts to skew priorities to destination marketing, reducing time and focus on longer term revenue raising activities and place building. **Core funding would give DMOs the breathing space and firm foundation they need to support a strategic agenda and lean-in to the Government's tourism priorities, and I do not think the Government can expect high potential DMOs to consistently and substantively support them without it.**

[2] This figure is the median average, rather than the mean average, as a small number of DMOs administer much higher amounts. The median is therefore a better measure of central tendency in this instance.

- **Evidence:** There was a lot of evidence put forward about the specific value that a DMO can bring. Clearly they add value, otherwise an estimated 50,000 tourism businesses would not pay them membership fees, but the evidence provided was not consistent across DMOs and tended towards the anecdotal rather than the robust. There's no national framework to compare performance between DMOs and **on the whole tourism data is weak**.
- **Engagement:** Some DMOs are able to act as the 'broker', 'convenor' and 'advocate' for the visitor economy in their area, and are well engaged with all their key strategic partners. I've included the example of Experience Oxfordshire in the report, which helped over 10,000 businesses during the pandemic. However, this is by no means consistent across the country.
- **Relationship with local and national Government. Many contributors to the review felt that they were not part of a national tourism strategy, or a coherent structure with clear, distinct roles for national Government, VisitEngland and DMOs.** VisitEngland, though praised for their work during the pandemic, was criticised for being disengaged and not fulfilling a leadership role. **Many Local Enterprise Partnerships and Local Authorities, in particular, appear to ignore or downplay the economic value of the visitor economy** and are not as sufficiently engaged as they could be with their DMO.

15. **I therefore concluded that the current landscape is not economically efficient, effective or sustainable. It is not configured in such a way that best enables the Government to deliver its priorities as set out in its Tourism Recovery Plan and more could be done to integrate DMOs with the wider economic landscape.**

16. **If the Government wants to 'level up' DMOs and ensure they are fully equipped to be at their best, then fundamental change is needed, not tinkering around the edges.** Coherence must be brought to the landscape, and my recommendations set out a new tiering system to do that. The foundations also need firming up, which is why Ministers must be prepared to provide funding to top tier Destination Management Organisations best placed to support the growth of regional tourism. At the moment, England is an international outlier in relation to how 'hands-off' the Government is. DMOs themselves must also embrace change and if they are not prepared to be held to account, to move away from an over-focus on marketing or to collaborate, then they cannot expect funding. If the changes I propose are implemented, then English Tourism will acquire a strong network of DMOs able to support delivery of the Tourism Recovery Plan, leading on key national priorities such as securing more higher-spending visitors in every region, sustainability, inclusivity, extending the tourism season and place-shaping.

17. However, if the Government decides to play a greater role, it must be careful. It is certainly conceivable that Government intervention could exacerbate existing issues , or create new ones, if mis-handled. In particular, it must appreciate that the diversity and breadth of England's tourism offer is a fundamental strength and not impose a uniform one-size-fits-all solution that treats every destination as having the same needs. **It must also appreciate that in the tourism world, the consumer should come first. No attempt should be made to fit DMOs neatly into existing administrative structures** – be they Local Authorities, Local Enterprise Partnerships or something else – this would ultimately lead to destinations not fulfilling their potential.[3] Finally, if the Government decides to provide funding it must hold DMOs to account for delivery. My recommendations are designed with these considerations in mind, and I have summarised all twelve on the following pages.

18. This report will now need to be considered by the Secretary of State for Digital, Culture, Media and Sport, as well as the Minister for Tourism. It is in their gift to decide whether or not to implement the recommendations that I have set out for the Government.

[3] It is helpful when these align, however, as is the case in some locations like London and Manchester. Potential 'county deals' may help alignment further as counties are a more natural fit with the consumer.

My recommendations for Government

Recommendation 1: The Government should bring coherence to England's DMO landscape via a tiering approach, using an accreditation process to create a national portfolio of high performing Destination Management Organisations that meet certain criteria. I would also suggest a move away from the confusing 'DMO' term and call these nationally accredited Tourist Boards.

Recommendation 2a: The national portfolio should then be split into two tiers – a top tier of accredited Tourist Boards acting as 'Destination Development Partnerships' or as leaders of them, (these could be described as 'hubs') and a second tier of accredited Tourist Boards acting as members of these Partnerships ('spokes').

Destination Development Partnership status could be awarded to either an individual accredited Tourist Board covering a large enough geography (e.g. a city region) or to a coalition of willing accredited Tourist Boards within an area that come together under a lead Board.

Recommendation 2b: The Government should then provide core funding to each Destination Development Partnership. The funding should be focused on activities that ensure their destination remains sustainable, competitive and responsive to high level strategic challenges identified by the Government such as those around sustainability, skills, inclusive tourism and levelling up. The Destination Development Partnership would be expected to pass down a degree of funding to accredited Tourist Boards amongst its coalition and work collaboratively with them to deliver a shared vision.

Recommendation 3: DMOs that do not meet the national accreditation criteria should be automatically considered as part of a 'third tier'. These are likely to be small, localised Destination Marketing Organisations and the Government should minimise its engagement with them.

Recommendation 4: As it is England's National Tourist Board, with the statutory responsibility for growing tourism at an England level, the Government should charge VisitEngland with responsibility for creating, maintaining and supporting this new tiered structure. It should receive sufficient funding and resources to do this.

Recommendation 5: The Government must also change its approach, in order to maximise the success of the new system. There is currently insufficient appreciation of the importance and promise of the visitor economy at the top of government, leading to unfilled potential in DMOs and the wider tourism landscape. In practice, responsibility for tourism policy cuts across multiple departments, creating a confusing picture. Practical measures to address these issues could include elevating the Tourism Minister to a Minister of State position and either reallocating responsibilities from other departments to sit under that Minister or making the Minister responsible for the activities of teams within multiple departments – this latter suggestion is an established practice already in other policy areas which cut across Whitehall departments.

Recommendation 6: In order to help DMOs and Local Authorities take decisions on how best to develop the visitor economy in their local area, the Government should improve access to quality data by introducing the proposed Tourism Data Hub as a matter of urgency.

Who does what? The structure of English Tourism if the recommendations are implemented:

National Government

- Sets England's tourism strategy.
- Government responsible for a wide range of policy levers affecting performance of the tourism industry – e.g. tax policy, labour market policy and visa and border policy.
- Funds the National Tourist Board, trading as VisitBritain and VisitEngland, to promote and develop England's tourism industry, e.g. international marketing, business support, quality assessment and data collection.
- VisitEngland gains responsibility for running an accreditation system that creates a National Portfolio of Tourist Boards (formerly DMOs). They would also be responsible for working with the Destination Development Partnerships to collectively deliver England's tourism strategy.

Regional Tier – Destination Development Partnerships

- Either individual accredited Tourist Boards from within the National Portfolio that cover a large enough geography (e.g. a city region), or a group of them acting in coalition under a lead Tourist Board.
- Able to receive multi-year core funding from the national Government, via VisitEngland.
- Responsible for a Destination Development Plan which sets regional priorities for the visitor economy in the geography covered, in-line with England's tourism strategy.
- Focused on strategic objectives – e.g. skills, sustainability, levelling-up, inward investment, productivity and accessibility.
- Main conduit of information between Government and tourism sector. Undertake data collection.
- Expert source of advice on tourism investment, infrastructure and on bids for Government funding.
- Expert source of advice on major events – e.g. acting as convention bureaus.
- Lead on tourism product development – e.g. integrated transport passes or travel itineraries.
- International travel trade engagement.
- Well integrated with key regional actors – e.g. county councils, Local Enterprise Partnerships, Mayoral Combined Authorities.
- Undertake back office functions for accredited Tourist Boards within the region.

Intermediate Tier – Accredited Tourist Boards

- Members of Destination Development Partnerships and able to receive downstream funding from them.
- Work in collaboration with Partnership on its Destination Development Plan. Able to articulate local tourism development needs and ensure they are incorporated into the overall Plan.
- Focused on marketing, tourism promotion and information provision activities.
- Capable of collecting evidence/data on the tourism situation 'on the ground'.
- Well integrated with key regional actors – e.g. district councils, LEPs.
- Day to day business support, development, engagement and account management.

Local Tier – Local Marketing Organisations

- Unaccredited and unaffiliated with any Destination Development Partnership.
- Unable to receive funding from the central Government.
- Almost entirely focused on marketing and promotion.

My recommendations for DMOs

Recommendation 7: DMOs must accept that they also have a role to play in driving forward change; it cannot just be left to the Government. To maximise the success of the new structure I have outlined, DMOs will need to take a less territorial approach, have a greater focus on collaboration, and recognise that the current fragmentation is holding them back from acting as effective advocates for the visitor economy.

Recommendation 8: DMOs should seek to diversify their income streams, and should share and learn from examples of best practice. This will enable them to best leverage the core funding I propose and I would expect a commitment to diversification as being an accreditation criterion.

Recommendation 9: DMOs should have a rigorous focus on keeping the skill sets and expertise of their own staff up-to-date, particularly with respect to digital skills, so as to ensure their destination's offer continues to be sustainable and competitive.

Recommendation 10: DMOs should have more diverse boards that fully represent their communities as well as their businesses and visitors.

My recommendations for Local Enterprise Partnerships and Local Authorities

Recommendation 11: Local Enterprise Partnerships must realise the value of tourism, ensure the visitor economy is fully integrated into their economic strategies and play their full role as partners in the activities of their local accredited Tourist Boards and Destination Development Partnerships. They should recognise that DMO type organisations are best placed to drive growth in regional tourism and they should actively support them.

Recommendation 12: Local government – be that a District Council, County Council, Mayoral Combined Authority or any other formulation – must also realise the value of tourism and should strive to play their part in supporting accredited Tourist Board and Destination Development Partnerships. They should accept that for DMOs to be at their best, they need to be public/private/community partnerships, not based solely in a Local Authority but working in partnership with them. They should also involve their DMO in any policy decision-making affecting the visitor economy.

Introduction

1. **Tourism is an important component of the UK's economy.** It creates wealth and jobs, broadens minds, supports wellbeing, drives investment and sustains the protection of our natural, cultural and historic heritage. In 2019, tourism directly (i.e. as a result of visitor spending) supported around 4% of the UK economy (£75bn) and 1.7 million jobs.[4] For perspective, the UK automotive sector employed 390,000 pre-COVID and the aerospace sector employed 120,000 – so tourism directly employs more than double both sectors combined.[5] The indirect benefits of tourism are greater still, with the visitor pound indirectly supporting up to 4 million jobs[6] in total across the UK, including the florist producing flowers for an event venue, the plumbers and electricians servicing local hotels, and the farmer providing produce for a restaurant chain.

2. **The tourism ecosystem is diverse and complicated.** In 2019 there were over 230,000 businesses operating in the sector across the UK[7] – 98% of them small and medium sized enterprises[8] – including transport providers, accommodation providers, attractions and tourism 'facilitators' such as tour operators, tour guides, travel agents, travel insurance companies, those working in the meetings, incentive travel, conferences and exhibitions sub-sector and, of course, DMOs. England itself is also a diverse visitor proposition, spanning urban, rural and coastal destinations, as well as areas of wilderness, within a relatively small footprint, and no two places are the same in terms of their situation, history, and thus their visitor offer. This diversity is a major strength.

What is a DMO and what do they do?

3. **DMOs are found across the world at national, regional and local levels.** Sometimes they are known as tourist boards, sometimes visitor or convention bureaus. The UN World Tourism Organisation defines Destination *Management* Organisations as 'the leading organisational entity which may encompass the various authorities, stakeholder and professionals and facilitates partnerships towards a collective destination vision.'[9] At their best, they are a crucial part of the tourism ecosystem.

4. **In England, the term 'DMO' means different things to different people, most tellingly even amongst those working for DMOs.** It can stand for either Destination Management Organisation or Destination *Marketing* Organisation and even within those categories no two organisations are particularly alike. I found fairly swiftly that in an English context there is no simple answer to the questions: 'What is a DMO?' and 'What do DMOs do?'

5. **Fundamental to all DMOs, however, is a desire to promote their locality or region as a visitor destination.** They want to see visitor spending increase, to promote growth locally, to provide a visitor offer that remains sustainable and competitive and a high quality visitor experience. In England, 150 is often cited within the sector as the best estimate for the number of organisations that might describe

[4] See the ONS Tourism Satellite Account.
[5] See **here** for the Aerospace Sector Deal and **here** for the Automotive Sector Deal.
[6] IBID
[7] ONS Tourism Satellite Account
[8] ONS Business Activity, size and location
[9] See https://www.e-unwto.org/doi/epdf/10.18111/9789284420841

themselves as 'DMOs' (marketing and/or management), but we do not know the true figure because there is no agreed definition or formal register. DMOs in England are organic organisations, in that they have by and large developed from the ground up; they do not exist within a top-down strategic framework or structure and have not been created or mandated by the national Government. They each cover a specific geography – usually detailed in their name (e.g. Marketing Manchester or Visit Cornwall – often a 'call to action' for the consumer). They have their own funding models, governance structures and priorities. The variation in structure, funding, performance and size across England (and globally) is substantial. No two DMOs follow the same model, or carry out the same activities, although in England it is common to find duplication of effort by separate DMOs covering the same location.

6. **There are many ways in which a DMO might promote their destination.** Marketing or promotional activities in their area targeted at domestic audiences is the most common activity. But the vast majority of DMOs also provide advice, signposting and support to local tourism businesses, share information online with potential visitors or via printed materials, carry out research to understand consumers, and seek to represent tourism interests and the visitor economy to local and national Government. Less prevalent – though still common – activities include international marketing, training and consultancy services, engaging with the travel trade to develop products (e.g. touring itineraries), and taking direct consumer bookings for accommodation, attractions and experiences.

7. **DMOs operate within a crowded regional and local landscape, and are not the only organisations involved in activities affecting the development of regional visitor economies.** There are many other players, including:

   a. **Local Authorities** – some with their own tourist departments (some of which may identify as DMOs) and some who provide funding to their local DMO. Local Authorities can also be direct players in the visitor economy, running museums, heritage institutions, and libraries for example. Local Authority involvement in, and funding for, tourism has receded over the last decade.

   b. **Local Enterprise Partnerships (LEPs)**, and their associated Growth Hubs, which can direct and administer funding relevant to the visitor economy (e.g. for training programmes or infrastructure development). The evidence I gathered suggests LEP engagement in the visitor economy – and thus with their local DMOs – varies significantly from place to place.

   c. **Mayoral Combined Authorities (MCAs)**, established by the national Government, and possessing devolved powers with direct and indirect relevance for the visitor economy (e.g. transport, inward investment etc).

   d. **Business Improvement Districts (BIDs)**, funded directly by local businesses to undertake various activities, including promotion. A number of DMOs – often those in coastal areas – follow the BID model, sometimes called Tourism Business Improvement Districts.

   e. **The British Tourist Authority (trading as VisitEngland and VisitBritain)**. VisitEngland and VisitBritain could themselves be described as DMOs on a national scale, in that they exist to promote England, and Great Britain, to domestic and international markets. Their existence, structure and role are set out in statute however[10], and as such are more formal than those of other English DMOs. The British Tourist Authority has relationships with some of England's DMOs, but not all of them and not each to the same degree.

   f. **Central Government Departments**, including but not limited to the Department for Digital, Culture, Media and Sport (DCMS) which leads on tourism policy, with the British Tourist Authority acting as its delivery body, and has a relationship with a limited number of English DMOs. Other Departments include the Ministry for Housing, Communities and Local Government (MHCLG) which funds Local Authorities, and often administers grant funding for which DMOs might bid, and the

[10] The Development of Tourism Act, 1969

Department for the Environment, Farming and Rural Affairs (DEFRA), which oversees the National Landscapes, most of which work closely with their local DMOs or indeed carry out DMO type activities (e.g. product development).

g. **Arms Length Bodies**, such as Arts Council England, Historic England, and the National Lottery Heritage Fund who administer funding, support and advice to culture and heritage organisations – which are themselves supported by, and support in turn, the visitor economy, and often work closely with their respective DMOs but not always.

h. **The private sector**, including visitor economy businesses such as hotels, visitor attractions, transport providers, bars and restaurants, event venues and tour operators which often provide DMOs with the majority of their funding via membership fees.

Why do DMOs exist?

8. **Tourism businesses are part of a wider ecosystem of businesses that collectively make up a destination**. Many companies can and do promote their own tourism business, be that a hotel chain or an airline, but the success of their business is inherently tied up with the success of a destination as a whole. Tourists do not just visit a hotel – they stay in one while doing other things in the local area, so for the hotel to be successful, it needs a strong set of local attractions, safe and clean streets, places for its guests to eat and drink, excellent public amenities and effective transport connectivity – to name a few. Consumers also tend to think of a destination as a whole, encompassing a constellation of businesses and attractions.

9. **DMOs exist because they are responding to a market failure**. Individual tourism businesses will tend not to allocate sufficient resources to advertising their destination, because doing so would result in other tourism businesses getting some of the benefit without contributing (so called 'free-riders'). DMOs fill this gap by allowing businesses to pool their resources and market the destination collaboratively. This does not remove the free-rider issue, but it reduces it, facilitating a greater amount of marketing and support than would otherwise exist if firms relied on their own resources alone, achieving economies of scale and far greater reach and impact for those businesses.

10. **DMOs can also address coordination failure**. The tourism sector is highly fragmented with many micro businesses and coordination between businesses to address collective issues such as signage or transportation can be difficult, since they may view each other as competitors for a shared, limited number of visitors. DMOs often take on place management and destination development responsibilities – for example, by advising on planning applications – acting as a unifying and collaborative force to address this fragmentation.

11. **Information failure is also an issue that DMOs can help tackle**. In the tourism sector, this traditionally manifests in two ways – businesses lacking an understanding of visitor needs and motivations (particularly those coming from overseas) and consumers lacking information on where to go and what to do – in England, this is particularly the case outside London. For tourism businesses, understanding the tastes and preferences of international consumers in a different country can require extensive market research which is beyond their budget. A DMO is well placed to fill these gaps by providing campaigns and websites that raise consumer awareness of and interest in a destination's offer, running a Tourist Information Centre, or by commissioning market research to share with businesses. Reducing information failures boosts profits for businesses by enabling them to offer consumer-focused products, increasing demand and attracting more visitors to a destination.

12. **These market failures are why DMOs exist across the world – at national, regional and local level**s. It is also why I heard of several cases during the review where DMOs folded, only to spring back in another format a year or so later. But just because there is an enduring rationale and market failures that explain DMOs' existence, it does not mean they are currently performing optimally and maximising their potential to support the growth and productivity of regional tourism in England.

The review process

13. **The Terms of Reference (see Annex A) provided to me were clear**. I was asked to examine the following three questions, and I started the review operating under the assumption that the Government thought the answer to each of them was no:

    a. Is the current DMO landscape in England economically efficient, effective and sustainable (with regard to funding, structure and performance)?

    b. Does it best enable the government to meet its leisure and business tourism policy objectives at a national, regional and local level?

    c. Is it sufficiently engaged with the wider local and regional economic landscape?

14. **It became apparent early on that many in the sector felt the review was both necessary and long overdue.** In particular, the impact of COVID-19 on DMOs and the tourism sector more generally had accelerated the need for a thorough assessment. It is no surprise that the visitor economy has suffered so much as a result of the pandemic – it is an industry reliant on the movement and gathering of people, both of which have been heavily restricted – and Government restrictions resulted in significant declines in income for tourism businesses. This had a direct impact on the finances of DMOs, particularly those reliant on membership subscriptions from businesses who could no longer afford to pay. The Government's Terms of Reference recognise this impact, and over the course of the pandemic £2.3 million has been provided by the Government, via VisitEngland, to support the survival of commercially reliant DMOs enabling them to continue providing vital business support. However, I am under no illusion that this support, whilst crucial, will be undermined or even wasted unless a sustainable, effective DMO structure is put in place to underpin the recovery of tourism across all regions.

15. **I was also asked to look at how DMOs could support the national Government's tourism policy, in particular the ability of tourism to contribute to the levelling up agenda.** The Government's Tourism policy for the pandemic recovery period is set out in its Tourism Recovery Plan, published in June 2021.[11] This sets several medium to long-term policy ambitions under the 'build back better' heading, and articulates a vision for a more productive, innovative, resilient, sustainable and inclusive tourism sector, with tourism growing in every nation and region of the UK. A common theme across the evidence gathered was that DMOs and the wider visitor economy sector are well positioned in theory to help deliver this agenda, if not in practice due to the barriers holding them back.

Gathering evidence

16. **To inform the review, I met a wide range of stakeholders from across the Tourism sector.** The engagement and consultation has been extensive, despite the short timeframe available and restrictions related to the pandemic. The methodology is described in **Annex B**, but is summarised below. It is a measure of the commitment of those working in the industry and their broad support for this review that I was able to engage so widely in the challenging timeframe. It was a privilege to meet with so many professionals across the full spectrum of the visitor economy and I am grateful for their time and commitment.

17. **In March and April I held virtual meetings with stakeholders from across the sector**, including DMOs large and small, former Tourism Ministers, sector representative bodies, *Arms Length* Bodies, and business owners. The purpose of these meetings was to conduct an initial exploration of the issues, and to get a sense of emerging themes.

[11] See **here** for the Tourism Recovery Plan.

18. **In March I also launched two consultation exercises:**

    a. Between 18th March and 4th May I ran a **written consultation exercise**,[12] which anyone could respond to. This received 340 substantive responses, from a broad range of DMOs, Local Enterprise Partnerships, tourism businesses, other bodies and members of the public. Llewellyn McLaren Consulting were commissioned to analyse the responses.

    b. Between 24th March and 16th April I ran an **online survey for DMOs only**. This survey was sent by email link to 178 organisations and focused on capturing data about their size, structure, funding model and activities. Just under 100 DMOs provided fully completed responses to this anonymous survey.

19. **In April, I also conducted desk research to place the DMO landscape in a historical and international context.** I built up a picture of the model in multiple comparator countries and the Devolved Administrations. My historical assessment went back 50 years to the 1970s when 11 Regional Tourist Boards were introduced in England, through to the introduction of 9 Regional Development Agencies in 2003 and their abolition in 2012.

20. **Having gathered a significant body of evidence, I then held nine, in-person regional roundtable discussions in June**, each with a representative group from the respective region's visitor economies. These were held across the country and I used them to explain, assess, and test the themes which had emerged from the evidence, before moving on to discuss the policy implications and potential recommendations.

Challenge Panel

21. **Throughout the review I have been ably supported by an experienced Challenge Panel.** I convened the Challenge Panel at the start of the process, aiming to ensure a diverse range of voices – both those with direct experience of working in and alongside DMOs themselves, as well as wider commercial and local Government voices. I saw the role of the Panel as being threefold – i) to interrogate themes as they emerged; ii) to act as a sounding board for my emerging thoughts about recommendations; and iii) to ensure the Review stayed focused on the key questions set out in the Terms of Reference. The panel met three times through the course of the review, including an in-person meeting in Liverpool in July to discuss emerging recommendations. Challenge Panel members also took part in the regional roundtables, and received advance copies of the draft report. Further detail on the membership of the Panel can be found in **Annex C**.

Report structure

22. **As required by the Terms of Reference, I begin this report by first painting a picture of the DMO landscape in England as I found it.** This draws on the quantitative survey of DMOs, and places the English landscape in a historical and international context.

23. **I then move on to analysing the strengths and weaknesses of the current DMO landscape.** Overall, I conclude that although there are instances of DMOs excelling in their roles, fundamentally the current model is sub-optimal. No-one would have designed the current DMO landscape if they were starting from a blank sheet of paper. The landscape is fragmented, inefficient, and lacks a structure that could and would enable the Government to meet its tourism policy objectives, and deliver effective and long-lasting sustainable growth in regional tourism. England is a relative international outlier in how 'hands-off' it is when it comes to supporting DMOs. This lack of oversight and support is holding DMOs back from achieving their full potential.

24. **Finally, I set out my recommendations for how the current DMO landscape might be improved.**

[12] See **here** for the consultation questions.

Chapter 1: Context – the current English DMO landscape

This chapter describes the DMO landscape in England as I found it and sets it in an international and historical context. The chapter covers issues such as DMO operating models, funding and geography, the activities that DMOs carry out, who they engage with and the impact of the pandemic. I appreciate that reading lots of statistics is not to everyone's taste, so I have tried to paint a clear picture as concisely as possible. For those who want to get into the recommendations quickly, I suggest remembering the following key takeaway points from this chapter but the detail and nuance is all important context for what I ultimately recommend.

Key points:

- There is a bewildering variety of DMO funding models and structures. The point that stuck out most for me was the extent of fragmentation and the large number of very small DMOs. There are at least 46 DMOs in the South East alone, with some areas covered by more than 4 organisations.
- DMOs are engaged in a wide range of activities – marketing is the most common but is not the be all and end all. 7/10 DMOs are doing at least nine different types of activity at the same time. Revenue raising activities are less common.
- DMOs speak to a huge range of organisations as part of their day job, but do not necessarily work with them closely. For example, two thirds speak regularly with their Local Enterprise Partnership, but only 18% have a formal partnership with them.
- DMOs are an important means by which the central Government distributes funding – with £500,000 on average per DMO being administered over the last three years – but only two thirds are involved in bidding for this sort of activity.
- DMO income has fallen steadily over the last few years, particularly commercial income during the onset of the pandemic, which fell by 64% last year.
- The overall story of the last decade is of the retreat of the public sector from supporting DMOs, with the national Government going first when it abolished Regional Development Agencies and then Local Government slowly withdrawing. Between 2009-10 and 2017-18, annual Local Authority spending on tourism fell by 56% a year.
- England is now a relative international outlier in how little the state is involved in DMOs operating on a large geographical scale.

Every DMO is unique

25. **Before I started this review, I knew of the significant variation in DMO structures, models, and geographies, but the review brought home to me just how varied the landscape is.** No two DMO is the same. This variation and complexity makes answering the question 'what is a DMO?' challenging. Further, I soon discovered that the Terms of Reference started on a false premise, by assuming that the 'M' in DMO stood for 'Management', as if this was common to all DMOs. While many I spoke to agreed with the acronym, there were others who felt that for the majority of DMOs the 'M' stands

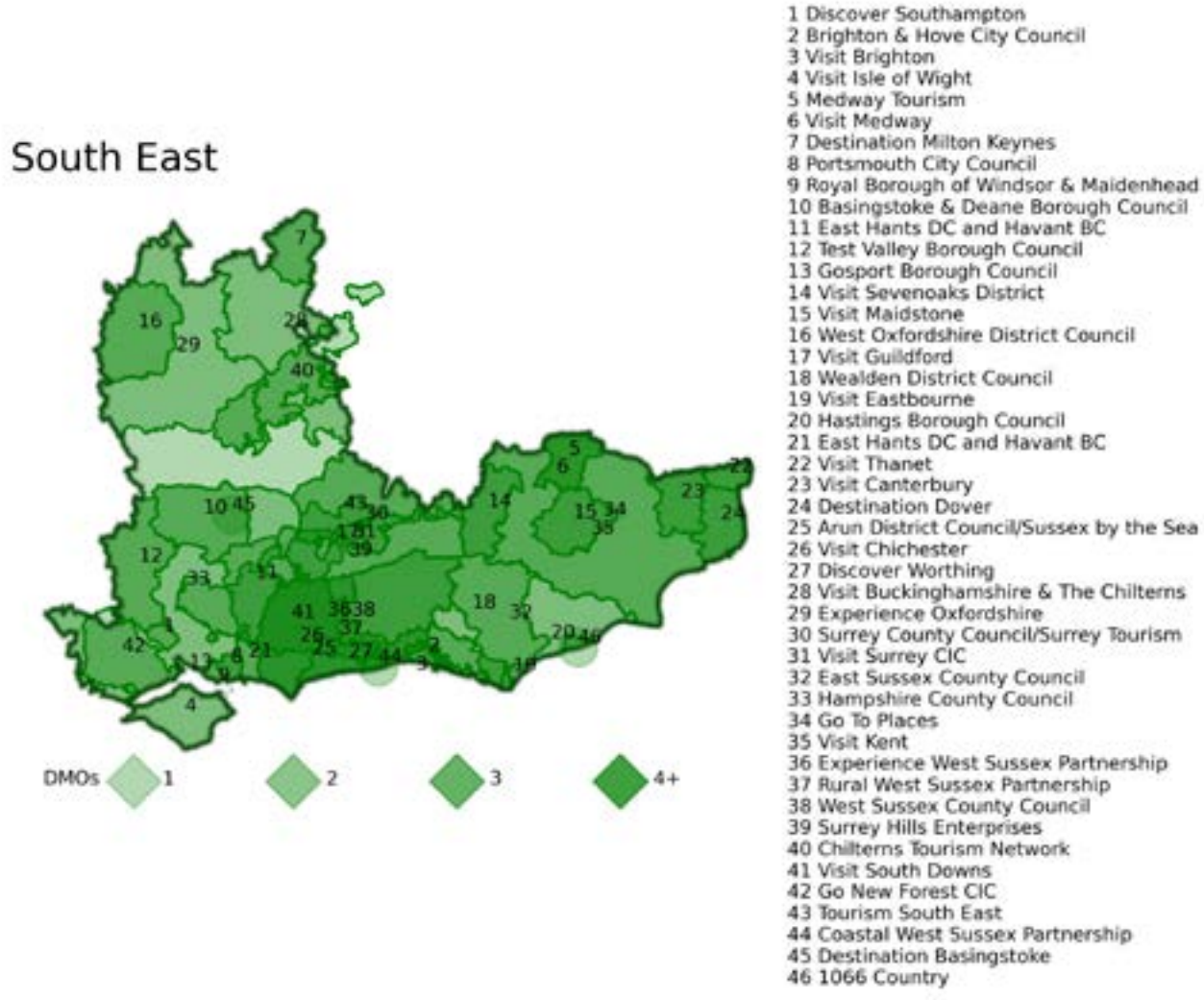
first and foremost for 'marketing', with only a limited number of English organisations fulfilling a 'Management' role. Many complained to me that there are not actually an "estimated 150 Destination *Management* Organisations in England", as the Terms of Reference put forward as fact, but rather 150 calling themselves that. The range and variation, combined with the challenge of clearly defining what 'DMO' stands for, created a need for robust and reliable quantitative DMO data to make sense of it all. The quantitative survey of English DMOs – sent to 178 organisations in total – is to my knowledge the first of its kind.[13] I received 98 responses to the survey, which is a strong sample size allowing for firm conclusions to be drawn.

Findings from the DMO survey – structure and activities

Variation is a key theme when looking at DMO structures

26. **The density of DMOs within regions is not consistent across the country.** The greatest density of DMOs lies within the South West, with 28% of DMOs responding to the survey listed there. The South East also accounts for a high proportion of DMOs (23%). This broadly tallies with a mapping exercise I conducted of the 178 DMOs to whom the survey was sent, which shows at least 46 DMOs in the South East region alone, with many examples of geographical overlap and a picture that is overall quite confusing (just look at the figure below). Other English regions see less fragmentation, for example the North East sees the lowest proportion of DMO coverage across regions excluding London

Figure 1: DMO locations in the South East of England (darker shades equal more overlap)



[13] It also became apparent that 150 DMOs was a best guess only. It did not, for example, include many Business Improvement Districts which share some DMO characteristics. We still do not know the true number of DMOs in England.

27. **The most common DMO footprint is a county** (29% of respondents said they cover a county and 7% said they covered two or more counties) – perhaps understandable given most counties are fairly recognisable destinations. 12% of DMOs represent a major city area and 10% cover a region. 16% of DMOs stated that they cover 'other' areas, often a combination of area types (for example, 'National Park, District and Coastal Areas' or 'a large city and a coastal area'. Other standalone answers included a Unitary Authority area; a district with four market towns; and a Local Authority District.

28. **The most common legal incorporation for DMOs is as a limited company** (39%), though the proportion that operate as Local Authority tourism service departments is only slightly lower at 35%. Around one in ten DMOs follow the community interest company model. Again, the 'other' answers show a broad range of potential models for DMOs, including co-operative, not-for-profit limited company, and public/private sector partnership model. This variation is perhaps not surprising given the 'organic' way in which the current DMO landscape has emerged.

29. **In terms of funding, just over half of DMOs follow a mixed commercial membership / public sector income model.** Just 20% of DMOs operate on a purely commercial basis, and 15% are solely funded by the public sector. Public sector here could mean either local or national Government, but there is no core funding available from the national Government, only ad-hoc project funding. Some DMOs describe themselves as a Business Improvement District and I did hear during the review that this model can be favoured due to the longer-term certainty it provides (BIDs follow a five-year cycle), and the scope for commercial engagement beyond strictly tourism businesses.

30. **The majority of DMOs (56%) started operating in the last decade, with a median lifespan of 10 years.** This correlates with the demise of the Regional Development Agencies under the Coalition Government (which I cover in more detail below). However, a sizable minority of DMOs – 20% – have been operating for 20 years or longer. While almost two thirds of DMOs have consistently followed the same operating model over their lifespan, a third have previously followed different models, including a greater reliance solely on public sector income, and more complex membership models. Over time there has been a marked trend towards developing commercial partnerships as sources of income.

31. **Staffing trends show most DMOs are small – with four as the median average for the number of employees at a DMO.** The majority of DMOs have five or fewer staff (62%), a further 17% employ between six and 10 people, 12% of DMOs employ 11-20 staff members, and one in ten DMOs currently have more than twenty members of staff.

32. **The vast majority (76%) of DMOs have commercial members, with a similar proportion using a tiered membership scheme, seeing members opting in at various price points/tiers.** Based on the survey results it is fair to assume that around 50,000 tourism businesses across England are members of a DMO. Membership schemes can be quite varied, with some DMOs having only two tiers of membership, with others up to five. Some DMOs offer basic, free membership options, whilst others offer one flat fee with bespoke "bolt-ons" available. DMOs have 200 commercial members on average, though a quarter of DMOs surveyed have more than 500, and 9% more than 1000 members. A pattern begins to emerge from the data here, with a small number of fairly large DMOs (which tend to be the ones operating for a longer period of time) and a large number of small or micro organisations.

33. **More than three quarters of DMOs (77%) do have a governance structure of some kind in place, such as a formal board.** The majority have a 75:25 split in terms of private and public sector representation, though a small number aim for a broadly equal split. Board members can come from across the DMO's regional visitor economy, encompassing Local Authorities, County Councils, LEPs, charities, universities, and tourism interest groups across sectors such as cruise, aviation, hotels, hospitality, attractions and Destination Management Companies. DMOs operating as limited companies, or community interest companies, were more likely to have a governance structure in place, while almost half of Local Authority tourism service department DMOs do not currently have a formal governance structure.

Figure 2: For how long has the DMO been operating, to the nearest year?

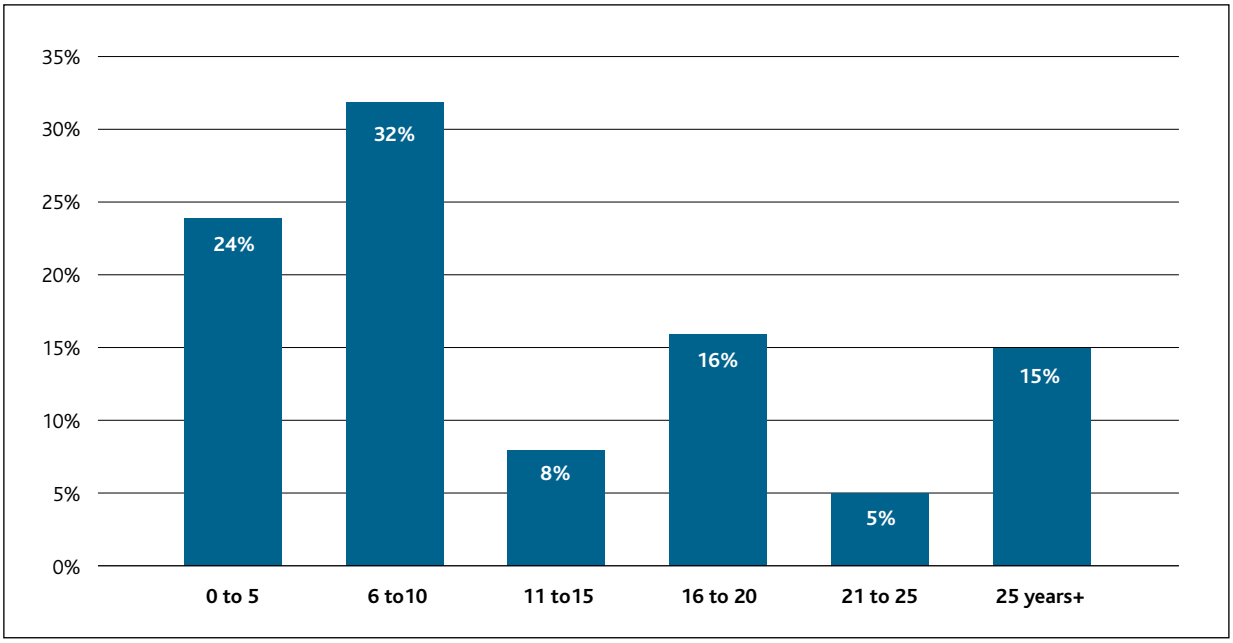
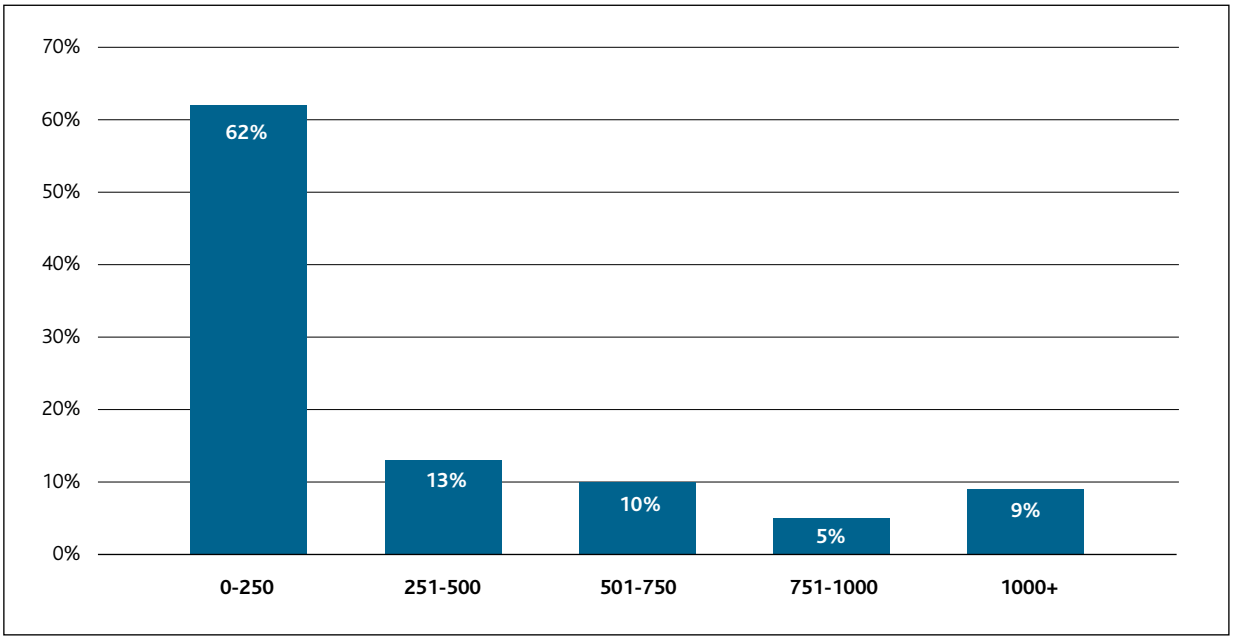


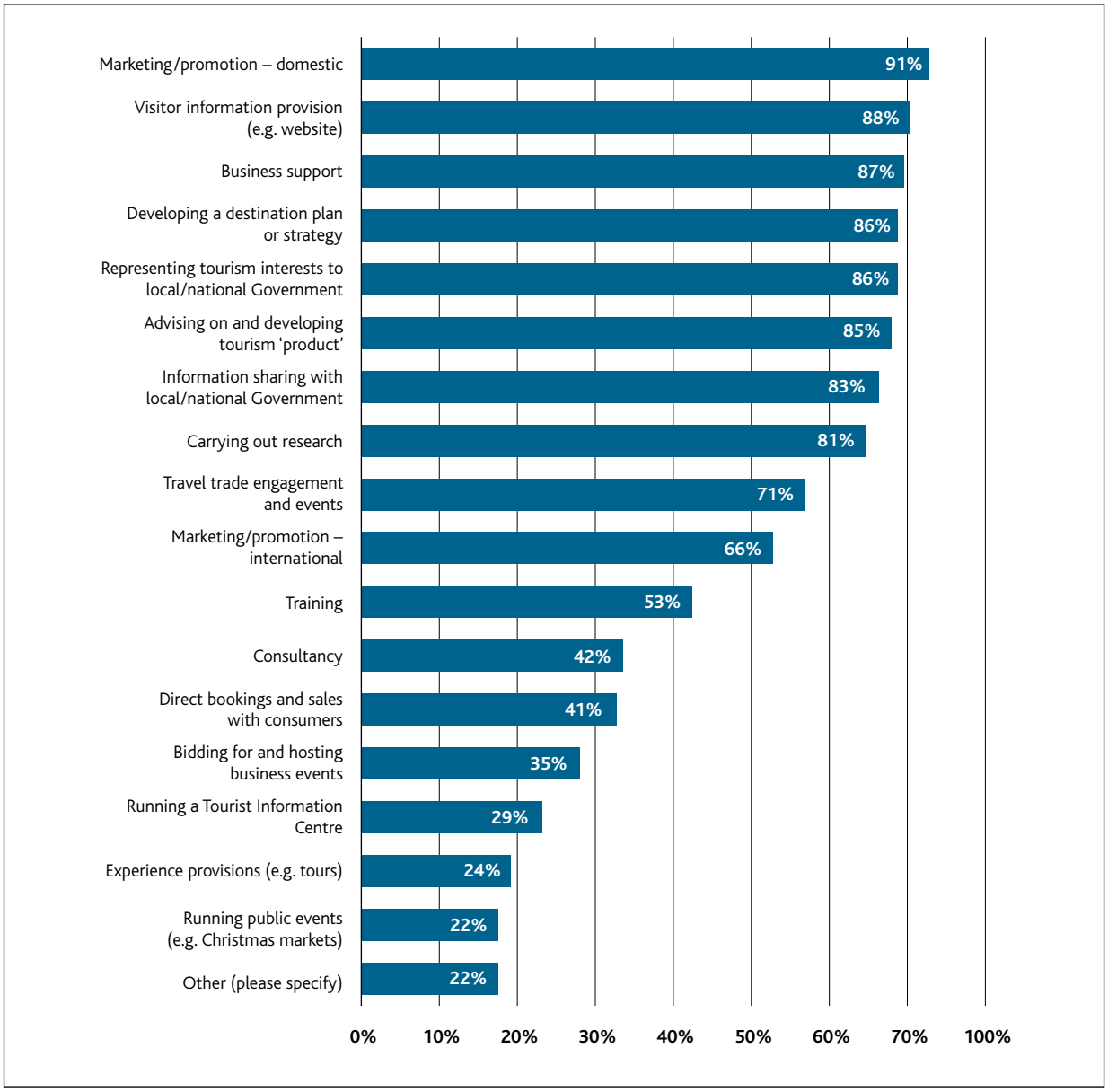
Figure 3: How many commercial members does the DMO currently have?



A wide range of activities are undertaken by DMOs – both within and beyond their areas

34. **DMOs undertake a broad range of work – 7 out of 10 DMOs carry out at least 9 different types of activity as part of their role.** I got a sense during the review that the wide range of activities a DMO is engaged in can sometimes be overlooked by important local decision-making bodies like the Local Authority or Local Enterprise Partnership. Whilst domestic marketing is the most prevalent activity, common across 91% of DMOs, visitor information provision (88%) and business support (87%) are also near-universal. 86% of DMOs also say they advocate for the sector with local and national Government, and develop destination plans and strategies for their area, though the survey did not provide any data on how effective or detailed these plans are. The figure on the following page sets out the wide range of activities that DMOs say they carry out.

Figure 4: Which of the following does the DMO carry out as part of its role (since 2018)? Select all that apply.



35. **The importance of DMOs as communication channels is demonstrated by the prevalence with which they share information with local and national Government** (83% said they do this), and carry out research (81%), while the high proportion that play a role in advising on and developing tourism 'product' (85%) shows their sector expertise. Despite the near-universal prevalence of domestic marketing (and a majority of DMOs – 66% – also carry out international marketing), it would be wrong, based on these findings, to characterise DMOs as solely marketing organisations, even if for some this may be the most visible of their activities. Once again, however, it is important to remember that the data does not show the degree to which DMOs carry out each role, or how effective they are at doing it. Just because a DMO says it 'carries out research' or 'represents the national Government' it does not mean the research is in any way robust or that the DMO is an effective advocate. Performance is a theme that I turn to in the second Chapter.

36. **Of those DMOs that do carry out marketing and promotion, the majority (60%) stated that they measure campaign returns on investment**, with fully commercial and mixed private/public sector partnership DMOs more likely to do so than those based in a Local Authority tourism services department. Reported returns ranged from £3.30 generated from every £1 spent, to £75. Other DMOs

use alternative metrics to evaluate impact, including 'Click Through Rate' on their website, social media engagement, hotel occupancy, newsletter signups, partners engaged, inward investment leads generated and visitor spend/footfall, suggesting that most DMO marketing activity is tied to some quantifiable performance measure although it can be hard here to isolate the DMO's value add or the final outcome.

37. **I found that lower proportions of DMOs carry out activities which could be revenue-raising** – for example, providing training (carried out by 53% of DMOs), consultancy (42% of DMOs), and taking direct bookings from consumers from which the DMO might take a cut (41%). Similarly, a minority of DMOs carry out events work: around a third bid for and host business events (35%), and 22% run public events such as Christmas markets. Around three in ten DMOs run a Tourist Information Centre (TIC) for their destination (29%) though qualitative evidence suggests that a number of these DMOs faced a sudden drop in expected income when Coronavirus restrictions meant these sites had to close. Unfortunately, I was not able to get a sense from the data of the amounts raised by these activities.

38. **The lack of consistency in DMO roles is illustrated by the broad spread of answers garnered by the 'other' activity option, which around a fifth of DMOs provided a response for.** Answers ranged from networking and sharing best practice, offering wider marketing services for the LEP and Growth Hub (i.e. not just tourism marketing), representing the visitor economy as part of coastal energy development projects, advising on business planning applications, running an accreditation scheme, promoting inward investment, and handling requests from film location scouts. A number of these have the potential to be developed as further DMO income streams were more DMOs aware of them and able to dedicate resources to developing them.

DMOs engage with a wide variety of partners

39. **A significant majority of DMOs said they maintain strong and regular channels of communication with visitor economy businesses and organisations, as well as with wider local, regional and national bodies.** This is to be expected – many policy levers affecting the overall competitiveness and sustainability of destinations will be held by other bodies and so a DMO needs to be able to influence them effectively. At least three quarters of DMOs (75%) speak to 9 or more visitor economy sub-sectors more than once a month, with almost all DMOs speaking regularly to attractions (96%), accommodation businesses (95%), heritage venues (93%), cultural organisations (91%) and hospitality venues like bars and restaurants (90%). Three quarters of DMOs speak to transport providers (75%), showing how their engagement extends beyond the local tourism 'offer' specifically and into broader (though still relevant) commercial sectors. To be honest, if a DMO was not speaking with the commercial sector then it would probably not survive for long. This is their bread and butter.

40. **Beyond private business, DMOs also speak regularly to an array of local, regional, and national bodies:** 89% speak to their relevant Local Authorities at least once a month, and a similar proportion speak to DMOs in the same region (85%), as well as to the British Tourist Authority (82%) and other DMOs (71%). I was frequently told that inter-DMO engagement has increased as a result of the pandemic. The majority of DMOs also speak regularly to tourism membership associations (61%), with half engaging with the Tourism Alliance (50%). Just under half of DMOs engage regularly with national Government representatives, such as civil servants in the Department for Digital, Culture, Media and Sport (46%). The DMOs that do hold these relationships are more likely to be larger DMOs, legally incorporated as a limited company, rather than those operating as Local Authority tourism service departments. The 'other' answers were wide ranging, including local energy providers, UNESCO World Heritage Sites, Conservation Boards, film offices and European tourism networks.

41. **Beyond regular engagement, the survey provides some evidence of formal partnership working by DMOs with specific bodies,** including Local Enterprise Partnerships and Business Improvement Districts (18% of DMOs say they work in partnership with each of these, respectively). The Local Enterprise Partnership figure is interesting, as it is far lower than the % provided for 'regular engagement', which 64% said they do. This suggests to me that a lot of engagement may not be

yielding fruitful outcomes. Over half of DMOs (57%) work in partnership with 'other' bodies, and the descriptions provided under 'other' demonstrate represent a wide range of organisations both within and beyond the visitor economy. These include other DMOs, Combined Authorities, Universities, Councils (parish, county and borough), Forestry England, regional National Landscapes, and Chambers of Commerce – a breadth that illustrates just how many actors there are with the potential to impact the fortunes of a destination.

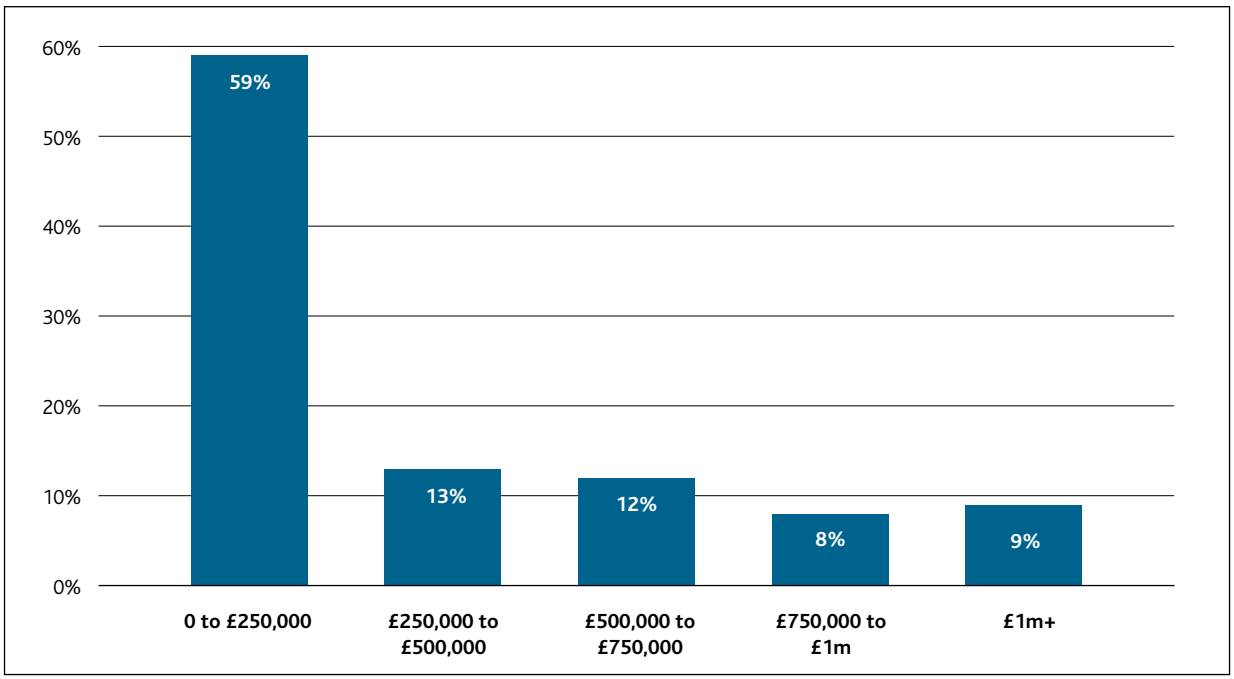
Findings from the DMO survey – Funding

Most DMOs rely on a combination of public and private sector income, though funding sources and levels vary significantly

42. **I asked DMOs how much income they received in 2020-21.** Across all DMOs, the *median* income expected was £196,000, but there was a significant range, with 40% expecting to receive over £250,000 and 8% over £1m. The *mean* average income was £410,000, and is skewed upwards by a small number of larger DMOs. This is shown on the graph on the following page, and again repeats the pattern outlined above of a small number of large DMOs and a large number of small ones. The median income from commercial sources was £50,000 (mean average £130,000) and the median income from public sources was £127,000 (mean average £280,000) – though 2020-21 was the first year where income from public sources was higher on average than from commercial sources. Types of commercial income include membership payments, commercial partners, product sales and consumer bookings.

43. **Local Authorities were the most common source of income from public sources – though Local Authority support comes in different guises.** Some DMOs receive it as part of a multi-year contract, others as an annual fee, similar to a membership fee. For around half of DMOs in receipt of Local Authority funding, it was tied to a Service Delivery Agreement which held them to outcomes, such as increased visitor numbers, increased spend and increased employment resulting from tourism activities.

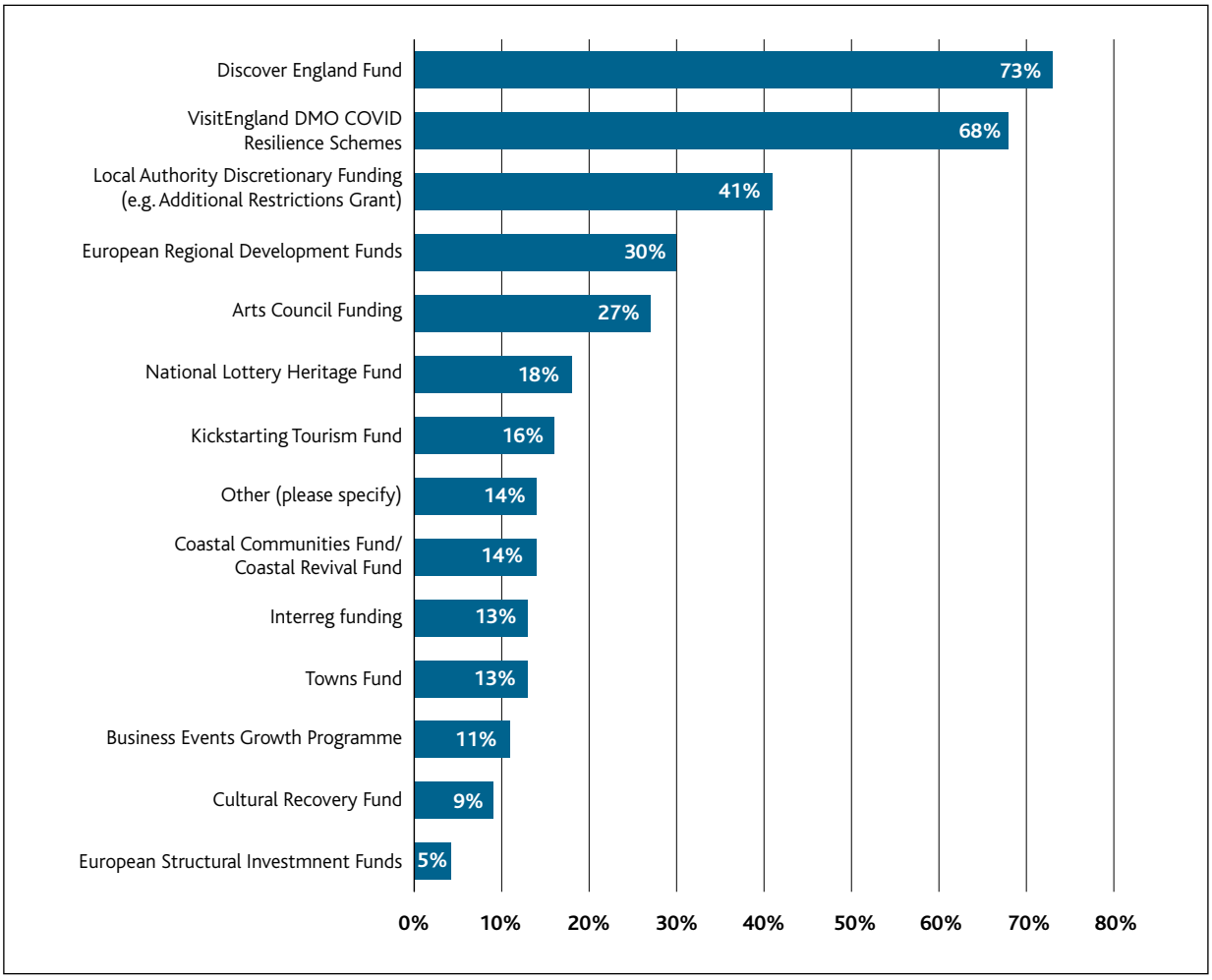
Figure 5: What is the DMO's estimated income from all sources for the financial year 2020-21?



44. **Other public sector funding streams were an important income source for DMOs in 2020-21**, with a quarter receiving public sector grants (25%), and 12% getting funding from their Local Enterprise Partnership. Examples detailed by DMOs included VisitEngland's Resilience Grants – a specific scheme set up to address declines in commercial income revenues – the Kickstart Tourism scheme and the European Regional Development Fund.

45. **Many DMOs have a lot of experience issuing grants on behalf of the Government.** Over the past three years, two in three DMOs (67%) have bid for Government funding, and the median average of Government funding administered by DMOs over this period is £500,000 per DMO. This is a significant number, especially in the context of the Terms of Reference which come at DMOs from the perspective of 'what can/do they deliver on behalf of Government'. Over a third (38%) of DMOs estimated that they had administered more than £1m in Government grants since 2018.

Figure 6: Which national Government funding has the DMO had a role in bidding for/ administering over the last three years?



46. **Government grant funds designed for DMOs specifically were the most commonly cited** – 73% having bid for or administered the Discover England Fund[14], 68% for various VisitEngland emergency DMO funding streams[15] – but wider funding was again prevalent, including European Regional Development Fund money (30%), Arts Council funding (27%), National Lottery Heritage Fund[16] (18%), and the Coastal Communities Fund/Coastal Revival Fund (14%).[17] This suggests DMOs can be an important means of directing funding to wider sectors with visitor economy interests, such as culture and heritage, and can also play a role in administering funding for regeneration projects.

[14] A £45m fund running between 2016 and 2020. The fund aimed to develop world-class English tourism products and itineraries for international audiences.

[15] In 2020, VisitEngland reallocated £2.3m to support commercial DMOs whose membership income had fallen significantly due to the Pandemic, via the DMO Emergency Financial Assistance Fund, in May 2020, and two rounds of the DMO Resilience Scheme, in September and November 2020.

[16] https://www.heritagefund.org.uk/

[17] The Coastal Revival Fund focuses on regeneration of at risk coastal heritage such as piers, lidos and promenades. The Coastal Communities Fund focuses on the creation of sustainable economic growth and jobs.

The pandemic resulted in significant falls in commercial funding

47. **Seven in ten DMOs stated that their income had fallen between 2019-20 and 2020-21** (69%), with income levels remaining level for just over a tenth of DMOs (13%) and actually increasing for 14%. Sub-analysis suggests that the DMOs whose income levels remained level or indeed increased were more likely to be Local Authority tourism service departments. Of those DMOs that had lost income year-on-year, three quarters had seen their commercial income fall (74%), while 23% had lost both commercial and public sector income. If we look at sources of commercial income – 79% of DMOs had received income from membership payments in 2019-20, falling to 66% in 2020-21, and 40% had raised revenue through consumer bookings, down to 31% in 2020-21. The same is true for Local Authority funding for DMOs: in 2019-20, 70% of DMOs received Local Authority funding, falling to 38% in 2020-21.

48. **Table 1 digs into this further, setting out DMO median income levels over time and for the future.** The table suggests that DMOs expect an ongoing shortfall in commercial income, driving a financial shortfall in the current financial year (2021-22).[18] As you can see, median income has steadily fallen since 2017-18, and the balance between the commercial/public sector has moved more towards the public sector with the onset of the pandemic. Between 2019-20 and 2020-21, the median income for all DMOs fell by 29%, but commercial revenue fell by 64%. In 2020-21, DMOs also spent more than income received, which will have eaten into their reserves. An uptick in income is expected for 2021-22, but the total remains significantly below pre-pandemic levels. It is also worrying to see DMOs forecasting a decline in income from public sector sources, following a boost in 2020-21. All this has implications for the crucial question of DMO sustainability and hardly suggests they are on firm foundations.

Table 1: English DMO median financial income – historic and future

Financial Year	Median total income	Median commercial income	Median public sector income	Median overall *expenditure*
2021-22	£214k	£78k	£81k	£217k
2020-21	£196k	£50k	£127k	£251k
2019-20	£275k	£137k	£79k	£275k
2018-19	£315k	£160k	£97k	£300k
2017-18	£324k	£126k	£105k	£207k

49. **By comparing DMO income in 2019-20 with DMO expenditure, it is also possible to estimate profitability pre-pandemic.** This suggests that the greatest share of DMOs – 37% – were profit-making organisations, with a third breaking even (33%), and three in ten operating at a loss (30%). Breakdowns of the data suggest that the pandemic's effects hit hardest those DMOs which had developed strong commercial operating models, but were often highly reliant on membership fees for income. Indeed, DMO membership data demonstrates the pandemic's impacts on this important source of income, with over half of DMOs seeing membership levels fall over the past 18 months (55%). Analysis of DMO staff levels tells a similar story: around one in three DMOs had lost staff over the past 18 months (32%) with a median average of five staff members lost across all DMOs. However, staff levels remained constant for 53% of DMOs – perhaps due to the Coronavirus Job Retention Scheme, which was used by half of all DMOs.

[18] Note that due to the use of median as the estimate of central tendency, the commercial and public sector medians do not sum to the overall median.

50. **Undoubtedly, the pandemic has hit DMO finances hard, but it is not the only hit they've suffered in recent times.** The next section contextualises the disadvantageous position that DMOs found themselves in at the start of the pandemic in comparison to both the English system of the past and the position in comparator countries.

Historical context

51. **The DMO landscape in England and its relationship with central Government has changed significantly over the last 50 years, but can broadly speaking be characterised as going through three phases.** The onset of COVID-19 could be described as a fourth phase because it has led to a shift in DMO priorities, changes in funding streams, and greater involvement of central Government/ VisitEngland, but it has not yet reached its conclusion. The first phase began in the 1970s.

Regional Tourist Boards – 1970s to 2002: a standardised regional framework

52. **Eleven Regional Tourist Boards were established in the early 1970s by the English Tourist Board, soon after its formation through the Development of Tourism Act 1969.** These Boards were companies limited by guarantee with mixed funding sources; roughly 10-20% came from the public sector with the rest derived from a mix of membership fees paid by tourism businesses and other commercial activities. Unlike the English Tourist Board they were not statutory entities but being in receipt of public funding meant they were at least in part accountable to the national government. The Boards covered large geographical areas and worked with smaller tourist boards. There was nothing like the current fragmentation we see now.

53. **The amount of core funding provided by the English Tourist Board to the Regional Tourist Boards, and the purposes for which it was provided, changed over time.** In 1998-9, for example, the nominal figure of £3.8m was provided to the Boards in order to deliver a range of regional and national programmes, and was allocated using a set formula.[19] In 2002-03, the nominal figure of £5.5m was provided to the then nine Boards, but funding was allocated based on a system of regional bids to deliver the government's tourism strategy.

Regional Development Agencies – 2003 to 2012: responsibility for strategic tourism development

54. **In 1999, the government introduced nine Regional Development Agencies.** These were non-departmental public bodies responsible for supporting economic development and investment in their regions. They had a set of statutory objectives relating to economic development, business competitiveness and employment, but with no specific mention of tourism.

55. **Between 1999 and 2003, Regional Development Agencies did not receive funding from the national Government to support tourism, but this changed in 2003.** In 2003, the Agencies took on a strategic responsibility for tourism development at the regional level, with tourism related targets included in their monitoring frameworks. DCMS contributed £5.5m a year to the Agencies for much of the 2000s. Between 2003-06 this was ringfenced for passing onto the Regional Tourist Boards (who in turn could pass it on to local DMOs), but from 2006 this requirement was removed, leading to some Regional Tourist Boards being subsumed into the Regional Development Agencies, e.g. in the North East and North West.

56. **Both the Regional Tourist Boards and Regional Development Agencies sat above, and worked closely with, sub-regional DMOs.** They were also engaged with Local Authorities and tourism businesses. For example, from 2006, the North West Regional Development Agency worked with a range of sub-regional DMOs including those in Blackpool, Cumbria, Manchester, Liverpool and Chester.

[19] See https://publications.parliament.uk/pa/cm199899/cmselect/cmcumeds/506/9060909.htm

In the South East the Regional Tourist Board (Tourism South East) remained post 2006, delivering for the South East England Regional Development Agency and working with DMOs including Tourism Berkshire, Tourism Surrey and the Isle of Wight Tourism Board.

57. **The Regional Development Agencies spent significantly more on tourism and leisure than they received in funding from DCMS.** In 2006-07, for example, the Regional Development Agencies outside London reported total spending on tourism of £36.8m, with only £3.6m of income coming from DCMS. Similarly the London Agency received £1.9m from DCMS but spent £23.9m on tourism support. Much of this expenditure is related to European Union or other grant funding and the Agencies were heavily involved in investing in tourism infrastructure. For example, the South West Agency invested £17m in the Eden Project and £12m towards the National Maritime Museum.

Abolition of Regional Development Agencies – 2012 to current: a patchwork quilt

58. **In 2010, the new coalition Government announced the abolition of the Regional Development Agencies and their replacement with Local Enterprise Partnerships.** A total of 38 Local Enterprise Partnerships were created in England, all part funded by the national Government but fundamentally they were business-led partnerships between local authorities and local private sector businesses. A key argument for their creation was to structure regional economic development bodies around 'functional economic areas' rather than public sector administrative regions. Local Enterprise Partnerships were tasked broadly with determining local economic priorities, driving economic growth and job creation and improving infrastructure and skills, but were not required to do this for the visitor economy specifically.

59. **When the Regional Development Agencies were phased out in 2012 and replaced by Local Enterprise Partnerships, DCMS funding for tourism via them was also withdrawn.** Furthermore, as Local Authority budgets were squeezed, they too withdrew funding for DMOs. DCMS estimates suggested that between 2009-10 and 2017-18, annual Local Authority spending on tourism fell by 56% a year, or £127m in real terms.[20] Many DMOs, having been able to partly rely on public funding for many decades, were now expected to fend for themselves.

60. **The Government's rationale for withdrawing public funding was set out in 2011 in a document entitled 'Government Tourism Policy'.**[21] The document recognised the need for 'strong and independent local tourism bodies to promote our different destinations effectively' and noted the existence of some capable and highly respected DMOs. However the document was critical of national Government funding for destination marketing ('unaffordable and unacceptable') and noted significant variation in DMO performance ('the worst are expensive talking shops which achieve very little, or 'civic pride' marketing organisations whose campaigns are better at massaging committee members egos than driving footfall and boosting sales for local tourism attractions'). It went on to lay out a vision for DMOs, stating:

- They should reflect the natural geography of an area's visitor economy rather than a local public sector or electoral boundary.
- That the government would *'allow'* DMOs to come together into larger groups if needed to 'share more than just marketing' such as pooling back office functions, but that any groups would be entirely voluntary and not imposed by Government 'at any level'.
- That the government will *'accept'* that destination boundaries might be messy as a result but that this was preferably to a 'bureaucratically-neat solution'.
- That the government will *'arrange'* their funding to be more focused on sustainable, commercial partnership marketing and sponsorship deals'.
- They should be 'Destination Management – rather than simply Marketing – Organisations' with *'clear mandates* to develop their local visitor economy according to whatever priorities they identify'.

[20] See https://www.gov.uk/government/statistics/local-authority-revenue-expenditure-and-financing-england-2017-to-2018-individual-local-authority-data-outturn

[21] See **here**.

- They 'must be strong partners with Local Authorities and Local Enterprise Partnerships in place-making'... 'but we will not create new institutional or bureaucratic structures to make this happen' as 'more centrally-imposed bureaucracy and process will not make bad DMOs more influential'.
- On Local Enterprise Partnerships in particular, the document noted that the DMO relationship would be 'especially important' as 'Local Enterprise Partnerships and DMOs should seek to work together to integrate destination management into wider economic strategies so that it can support the area's wider ambitions around driving enterprise, growth and employment'.

61. **In 2011, the Government predicted that 'scores of local Tourism Bodies' would be formed around key English tourism destinations.** This is what happened – as above, the survey found that over half (56%) of DMOs had been operating for under 10 years. The 2011 document went on to note that 'no matter how many local tourism bodies eventually emerge, we will also need a national body to develop and promote English tourism.' The document envisaged VisitEngland acting as a source of best practice and DMOs holding a majority of VisitEngland board seats.

62. **I would summarise the period from 2012 onwards as the government taking a 'hands-off' approach.** In the bullet point list above I have deliberately put some of the text in italics to draw out the tension between the thrust of the government's argument and what happened in practice. **By withdrawing funding and control over the DMO structure, the government effectively surrendered its ability to 'arrange' funding and 'allow' DMOs to band together if they wanted to.** The Government did not give DMOs 'clear mandates'. I shall come onto the consequences of the post-2012 changes in the next chapter, but it is clear from the findings of the DMO survey that it resulted in a fragmentation of the landscape. I am not convinced that destination management has benefited from there being 'scores of local Tourism Bodies'.

International context

63. **The key point I took from looking at what other countries do is that England appears to be the most 'hands-off' in terms of national Government engaging with DMOs at a local and regional level.** Many of the countries I looked at had DMOs at a regional level with a degree of state or national government funding in combination with private sector funding as well as clearer links back to the national Government in terms of accountability and strategic direction and some semblance of a coherent structure. For example in the USA and Germany we see regional entities funded by the states. In Japan we see a nationally led formal registration system for DMOs meeting a certain requirement. In Scotland and Wales we see the national Tourist Board playing more of a leadership and coordination role than in England. Across the board, the more localised a DMO, the more focused it is on marketing and the less a national or state Government is involved. I have summarised the key features of the countries I looked at in the table below.

Table 2: Key features of support for regional tourism / DMOs in comparator countries

Country	Key Features
USA	**National** • The National Travel and Tourism Office in the US Department of Commerce has statutory duties set by Congress, e.g. research and data collection, and official liaison to the Corporation for Travel Promotion (Brand USA). **Regional** • State tourism offices (e.g. Visit Florida) **generally funded by the State Governor**, and staffed by public sector employees. • Some operate at *arms length* from politicians, others follow their strategic direction.

Country	Key Features
USA (cont.)	**Local** • Composition and funding of local tourism offices (e.g. San Francisco Travel) varies from locale to locale. Some connected to local city/municipal Governments, some stand-alone private sector entities, some public/private partnerships. • Some State tourism offices work hand-in-glove with local DMOs, including by distributing grants to those willing to work within the tourism framework established by the state.
Canada	**National** • Destination Canada (the National Tourist Board) is set up by law as a crown corporation with specific statutory objectives including sustaining a profitable tourism industry, marketing Canada, supporting a cooperative relationship between the private and public sector and providing information about Canadian tourism to all parties across the tourism economy. **Regional** • Canadian Government support for regional tourism is largely distributed via 6 Regional Development Agencies. • These agencies have delivered pandemic-related business support to tourism businesses, e.g. a $500m Tourism Relief Fund. • **The Government of Canada sets a national strategic direction for tourism, and the Regional Development Agencies tailor the strategy/dispene support in a way appropriate for their respective regions.** • Each of Canada's ten provinces and three territories also develop and implement tourism strategies at the provincial and territorial level. • Provincial and local DMOs are either wholly funded through public funds or are a mix of public/private funding models **Local** • Provincial and local DMOs are either wholly funded through public funds or are a mix of public/private funding models. • Some are part funded by industry revenues (e.g. tourism taxes/hotel levies)
Germany	**National** • Around 100 DMOs (of municipal, regional and statewide size) are coordinated into the German Tourism Association. It is financed exclusively by membership fees and represents the interests of German tourism to policymakers and the public. It carries out activities such as quality initiatives and certifications in tourism. • The German National Tourist Board markets Germany as a destination abroad, in partnership with the marketing organisations of the federal states. It is 75% funded by the national Government. **Regional** • The *Länder* (16 Federal States) are responsible for the development of regional tourism. • **Regional tourism bodies are predominantly funded by the federal state Government, but also from their own revenues and the private sector.**

Country	Key Features
Germany (cont.)	**Local** • Many local DMOs exist to serve cities or particular regions, mostly financed by local businesses, governments and commercial activities. • The German response to my queries noted that individual city DMOs, like those in Cologne and Düsseldorf, focused almost entirely on managing and communicating the unique selling points of the city.
Japan	**National** • Structure established by the Tourism Nation Promotion Basic Law, introduced in 2007. • Prescribes the government to establish a Nation Promotion Basic Plan. • The national government provides consultation services, research and analysis and funding to support regional tourism. **Regional/Local** • The response to my queries described Japanese DMOs as 'control towers' for tourism destination development through regional marketing and management activities. • Local governments have a responsibility to formulate and implement measures that take advantage of the characteristics of the local area, as set out in the Tourism Nation Promotion Basic Law. • Funding is issued by both national and local governments to DMOs on a project by project basis. • **A 'Tourism Community Development Corporation Registration System' is used to formally register DMOs that meet certain requirements.**
Scotland	**National** • VisitScotland is an Arms Length Body of the Scottish Government. It includes a regional team of staff acting as key contacts for different regions of the country (VisitEngland does not have an equivalent team). • As in England, the Scottish Government has provided DMOs with support funding during the pandemic, as well as bespoke funding for marketing activity. **Regional** • City region and regional DMOs exist, as do regional and pan-Scotland sector groups, e.g. Wild Scotland and Developing Mountain Biking Scotland. Some receive funding via enterprise agencies on a short term basis, in order to meet strategic goals – for example in the south of Scotland a new DMO has just been established with the help of the enterprise agency. • There is no formal structure tying the activity of DMOs to the Scottish Government. **Local** • Local Destination Marketing Organisations exist but do not receive core funding from the central Government. • Some Local Authorities have set up their own *arms length* bodies to market and manage tourism.

Country	Key Features
Spain	**National** • National Government is responsible for international marketing (via the National Tourist Board, TURESPAÑA) and general tourism policy. **Regional/Local** • Each of the 16 autonomous regions has powers to deliver their own regional tourism strategy, which they do in cooperation with the national body. • **DMOs at a regional and local level do have access to public funding usually in the form of a fixed allocation within the administration's annual budget.** This is then supplemented by private or public sector income (e.g. from businesses or local authorities).
Sweden	**National** • The national government sets overall tourism policy, markets Sweden via Visit Sweden and produces/disseminates tourism research and statistics. **Regional** • Sweden has 21 regional counties. They are not obliged to take part in national tourism development work but many do and structures exist for them to do so. • Around half of the 21 regions organise their tourism work in publicly owned/ controlled DMOs with their own organisational bodies and boards. • **Between 1 and 5 million euros a year is allocated to or through regional stakeholders for tourism development, and is added to via EU structural funds.** **Local** • Local organisations working on tourism do exist, and will often develop their own plans based on the overarching regional plan.
Wales	**National** • VisitWales sits within the Welsh Government. It includes a regional team of staff acting as key contacts for different regions of the country (VisitEngland does not have an equivalent team). • No core funding is provided to DMOs by the Welsh Government but they have issued funding via specific projects or grants. **Regional** • Four regional tourism fora were established in 2014, meeting three to four times a year and bringing together key tourism stakeholders to drive the delivery of the tourism strategy for each region. **Local** • Destination Management Partnerships are a mix of public/private sector and have their own Destination Management Plans.[22]

[22] See here

64. **Analysis by the UN World Tourism Organisation, published in 2019[23] is particularly interesting, in that it focuses on institutional strengthening of DMOs and preparing them for new challenges, both key lines of inquiry for the review.** It talks about the need for a 'sound framework' to be set varying by 'level of action' (national, regional or local) but also notes that no one size fits all model can work due to the variation in the particulars of each destination. The Organisation for Economic Co-operation and Development (OECD) has also noted that 'for DMOs around the world, it is often a considerable challenge to generate the funding necessary to deliver strategic and operational benefits to a wide range of public and private sector stakeholders.'[24]

Summary

65. **Several themes emerge from my summary of the DMO landscape in England.** It is fragmented and highly variable in terms of structure, funding models and levels of income, governance structures, geographical coverage, activities and levels of partnership working. The pandemic has had a significant impact, in particular on revenue from commercial sources but also on DMO size and priorities. There is no clear framework for what a DMO in England should do and the current situation in England is an outlier, both internationally and historically, with respect to the extent to which the national government is 'hands-off' in its involvement with DMOs. I was particularly struck by just how many DMOs have been created over the last 10 years, which points towards the key theme of fragmentation. I will now move on to analysing the strengths, weaknesses, performance and impact of the current model.

[23] https://www.e-unwto.org/doi/book/10.18111/9789284420841

[24] See https://www.oecd-ilibrary.org/docserver/9074fc18-en.pdf?expires=1626273023&id=id&accname=guest&checksum=DF2DDC0D35E2B9D3C092A63DFED954BD

Chapter 2: Analysis – An assessment of the DMO landscape

This chapter analyses the strengths and weaknesses of the current DMO landscape. Although there are many instances of good practice and of DMOs adding a lot of value in terms of both quantifiable outputs and wider outcomes, **I am in no doubt that successes exist *in spite*, rather than *because* of the absence of a coherent structure and lack of Government engagement.** Furthermore, good examples are generally the exception rather than the rule. In my view, the DMO landscape that has developed over the past decade is on the whole sub-optimal, and is ultimately holding regional visitor economies back from achieving their full potential. Throughout this chapter I have used quotes from my engagement, and highlighted those in blue that I found particularly compelling.

The landscape currently has many strengths

66. **Across the qualitative consultation process, and in conversations with stakeholders both in interviews and at regional roundtables, I heard time and again that DMOs are valued and necessary local institutions.** The continued existence and ongoing longevity of some DMOs following the withdrawal of structured Government support along with the fact that many developed organically themselves after this date demonstrates that they meet a local and particularly business need, and are often the only local bodies with the experience, knowledge and expertise to fulfil a destination management and or marketing role. I have included some quotes from my engagement to illustrate this, and do so regularly throughout this chapter.

> *"It feels clearly sensible for DMOs to exist, as we should have Place based marketing. DMOs are the ones who create the brand for each destination…if they didn't exist you'd need to invent them."* Former Tourism Minister

> ***"A good DMO is greater than the sum of its parts. It speaks for the local industry, raises standards, supports training and skills, coordinates promotions and links into national structures for research and data gathering. None of these can be done by an individual commercial enterprise."*** Member of the public

DMO staff are passionate experts about their local areas

67. **An important, and frequently cited strength of the current set of English DMOs, is the local knowledge and expertise that DMO staff possess.** DMOs know their destinations, their brand and their tourism 'offer' better than anyone else, and are passionate about and committed to selling it to consumers whenever they get the chance. They can 'story tell' about their destination, tying together its key strengths to develop an appealing brand that at its best can appeal to a wide range of visitors (domestic and international), tourism businesses and other regional players. The written consultation responses in particular highlighted the dedication, expertise and drive of individual DMO staff.

> *"DMOs have a huge understanding of what their local product is, its strengths, and weaknesses, and who the regional players are – which businesses are dynamic/growing, which need support."* Tourism Representative Body

"DMOs are staffed by people with knowledge and passion about their area – they live there, they showcase it and make it work for businesses, residents, and the wider environment." DMO

"[DMO staff] are able to bring grass-roots experience to blue sky strategic thinking." Cultural Development Partnership

"It's taken time/work/energy to get here – our city is the attack brand. When seeking marketing funding they don't have to argue for this – it's a united proposition." DMO

DMOs are an important source of, and conduit for, information and intelligence

68. **Because of their local knowledge and expertise, DMOs are regarded as important conduits and channels of information between their local visitor economies and local, regional and national Government.** More than half of the written consultation respondents identified DMO prowess in gathering intelligence, and disseminating information, data, research and policy as a key strength. DMOs provide an easier route for VisitEngland and national Government to share information with the vast number of small and medium size enterprises that make up the tourism sector – a role that came to the fore during the pandemic. In turn, DMOs themselves fed crucial intelligence on the business impacts of restrictions to control the spread of the virus back up the chain to the Government, sometimes they were the only source of timely and reliable local data. Government officials that I have spoken to have been full of praise for the contribution of DMOs during COVID.

Good practice: DMOs and data during the pandemic – North of England Business Barometer

Over 2020 and into 2021, Natwest Group supported the development of a barometer, which was a survey issued over a number of waves to tourism businesses across the north of England in order to measure the ongoing impact of the pandemic on employment, revenue and business confidence.

The barometer was coordinated by Marketing Manchester and its distribution was facilitated via a network of nine Destination Management Organisations and Tourist Boards working collaboratively. The results were fed directly into the Department for Digital, Culture, Media and Sport, where they were shared with the Tourism Minister and contributed directly to decision-making.

The Barometer is a great example of how DMOs can act as a conduit of information between the national Government and the many small and medium sized enterprises making up the tourism sector.

69. **Even before the pandemic, DMOs provided an important means for the Government to obtain on-the-ground intelligence on fast-moving issues of national importance.** For example, Visit Wiltshire fed back valuable Salisbury footfall data after the Novichok incident, as did Marketing Manchester after the Manchester Arena bombings. Both DMOs then went on to receive bespoke funding from the national Government as part of a wider recovery package to address post-incident declines in footfall via confidence-boosting campaigns. It is important to note that this intelligence is provided to the Government free of charge.

"They do provide a vehicle – not perfect – for us reaching that vast tranche of SME base. The value that we managed to achieve during this last year…getting the message out to people" VisitEngland

"If there is an event where the Government needs to use DMOs (e.g. ministerial visit; after major events like flooding), we have that point of contact." DCMS

70. **DMOs regularly provide an important and efficient mechanism for the Government to administer funding directly to a local visitor economy** as we saw in Chapter 1 – from marketing campaigns like 2020's Enjoy Summer Safely campaign[25], to DCMS funds like the Culture Recovery Fund, to wider infrastructure and regeneration funds like the Towns Fund, Coastal Communities Fund and historic European funds.

DMOs have gained the trust of the private sector

71. **It is perhaps the way that DMOs marry elements of the public sector with the commercial drive of the private sector that sets them most strongly apart from other local bodies and institutions**. This private sector knowledge and expertise – along with the groundwork they put into building relationships with fee paying members and delivering returns for them – gives them credibility with tourism businesses, who often view them as trusted sources of information, support and research on everything from staff development to the latest consumer trends.

> *"It is critical to ensure [DMOs] are delivering – as fundamentally with all investors (public/private) you haemorrhage credibility if you do not deliver."* DMO

> *"DMOs provide value to their members by sharing information, customer research, rules and regulations from Govt – during the Pandemic, it's been how businesses have accessed support. [We get] emails from businesses without a DMO link – without a DMO/association link, they struggle to access support."* Tourism Alliance

> ***"Businesses do not like looking to Local Authorities for money/assistance. DMOs like [Visit X] are nimbler entities."*** DMO

Good practice: Supporting businesses during COVID-19 – Experience Oxfordshire

Experience Oxfordshire dealt with over 10,000 business enquiries during the course of the pandemic, with many being forwarded onto them by the Local Authority. The DMO went on to signpost these businesses to critical Government funding packages as well as advice.

In the written consultation, Experience Oxfordshire received praise from respondents for their actions during the pandemic, with one commenting that they represented 'an example of resilience and entrepreneurialism working against all the odds'.

72. **DMOs themselves, particularly those that lean towards 'management', often highlighted how this hard-won commercial credibility enables them to play an active role in working with their business members and partners to develop the area's tourism offer**. They offer support, advice and guidance so that businesses can grow and in turn, further add to the strength of the destination's offer. This is particularly the case in areas where particular skills and knowledge are often lacking amongst the private sector – for example, product development, encouraging direct online bookings, and targeting new markets, such as international visitors or business travellers.

> *"There are lots of food and drink businesses which have started and new accommodation providers – but a DMO has a role to nurture those businesses and bring them into the fold."* DMO

> *"Only a select amount of the county's product is promoted to consumers…lots of businesses [that aren't DMO partners] miss out on the business advice/support that would help them grow."* DMO

[25] A campaign launching in July 2020 focused on encouraging people to take advantage of hospitality and tourism businesses that were reopening following relaxation of COVID-19 pandemic restrictions. DMOs were invited to bid into a funding pot to amplify the campaign.

At their best, DMOs play an important role in advocating for the tourism sector

73. **My engagement highlighted the important role many DMOs play in supporting their members – and local tourism industry more broadly – by advocating on its behalf.** Advocacy takes place with wider stakeholders, with many DMOs speaking as the 'voice' of the visitor economy to Local Authorities, community groups, and Local Enterprise Partnerships. Having the backing of the private sector is seen as most important in enabling them to fulfil this role but it is not necessarily the case that all DMOs are being heard to the same extent.

> ***"[Good DMOs should be] advocating and communicating with other stakeholders (the Council, Local Authorities) about tourism development and infrastructure – e.g. arguing the case for transport, walking/cycling infrastructure, and marketing activity, while being seen to be unbiased by political decisions. They should be the voice of the commercial sector."*** Arms Length Body

> *"Kin to a public sector organisation but…not run by the public sector so are more responsive to the industry."* Member of the public

> *"DMOs should also be engaging with local communities so they accept visitors – there's lots of hesitance. A DMO should be able to do this – they're a representative as much of the visitor to the area as of the business in the area."* Tourism Representative Body

DMOs have clear strengths in convening and cultivating cross-sector relationships

74. **Many stakeholders pointed me towards the way that DMOs are able to connect, convene and cultivate relationships between the tourism industry and other sectors** such as transport providers, cultural and heritage organisations, and higher education institutions. Their local knowledge means that their networks can be especially strong, and this can enable DMOs to add value by linking contacts who otherwise would have struggled to find each other.

> *"ACE wants culture to play a role in attracting more/different visitors, and this requires the cultural sector to work with different – especially private – partners. DMOs have been/are key for making that succeed."* Arms Length Body

> ***"DMOs are like the glue sticking everything together, and align their objectives with the competitive market forces at work in the sector. They develop good partnerships with the sector and others"*** Tourism Representative Body

> *"[There's] absolutely a role for DMOs – they face from the city to the world, and back into the city, to say 'raise your game – standards, cleanliness'. They play both roles – the best face forward, and telling home truths."* Local Government

Good practice: A DMO makes the difference by using local connections to turn a good event into a great even – Bristol Cathedral

One excellent example of a DMO using its connections that was shared with me during my initial engagement was provided by VisitBristol (now Visit West).

They had been asked by an international client for inspirational venues for their gala dinner event, after it became difficult to deliver this highlight of their annual programme at their first choice venue due to complex logistics. Spending time with the organisers, the DMO discussed options that could provide not only that 'wow' factor that was needed, but which would also deliver against their very specific criteria. They connected the organisers with Bristol Cathedral, drawing on their network and experience as they searched for alternatives. A private dinner within the Cathedral was subsequently negotiated, this being the first time the Cathedral had been used for that purpose by the DMO's convention bureau.

Not only did it prove to be an incredible and well-received experience, but the success also enabled the Cathedral to use the temporary kitchen infrastructure needed to deliver such an operation for other events, enabling them to generate further income.

75. **The DMOs regarded as the strongest tend to be those that connect their commercial member needs with public sector decision makers**. In my experience, these DMOs are often those that cover a geographical area that aligns well not only with the consumer proposition (both for visitors, and for business members) but also with the relevant local Government boundaries – be that City, District or County Council, or Mayoral Combined Authority – and, on occasion, with that of the Local Enterprise Partnership.

> ***"Because the funding is often driven by local authorities, the geographies represent local authorities which are not necessarily natural tourism market geographies and that is a challenge."*** DMO

> *"For a DMO to be at its best then it needs to fit within [the] wider local economic strategy led by the Local Enterprise Partnership."* VisitBritain

When DMOs collaborate with each other, they can achieve economies of scale

76. **The evidence I took suggests that cross-DMO collaboration is welcome both to DMOs themselves and more widely**, as a way of sharing local best practice, developing new product offerings, and achieving economies of scale (for example, by amplifying a united voice and message for advocacy). However, some noted that DMO collaboration is often driven by the dedication of individual staff members, happening in spite, not because of, the current DMO landscape. Others noted that DMOs can tend towards competition, especially when funding opportunities are limited – creating a DMO vs DMO mindset that exacerbates existing fragmentation.

> *"With so much DMO experience…you either fight the system, or find a way to collaborate and benefit from the relationship."* DMO

> *"Collaboration and cooperation happens by accident rather than by design as they don't have a strategic network with aligned objectives. Quite a lot…is informal and relationship-driven; coincidental rather than driven from the centre."* DMO

> *"The tension is that DMOs tend to be in competition with each other too – sharing best practice has its limits. It's similar with funding applications – why would DMOs share that information when they're in competition for funding."* Tourism Representative Body

77. **The Discover England Fund initiative received almost universal praise for the role it had played in encouraging DMOs to come together.** This was a five-year, £45m product development fund administered by VisitEngland. It brought DMOs together as projects and catalysed a collaborative, rather than a competitive, mindset. The Fund put DMO competitive expertise to good use in developing market-focused products and enabling them to achieve greater market reach – and, in time, attract more visitors – than they would have done alone. The Fund also serves as another good example of the point referenced above about some DMOs being able to act as recipients of Government funding – without a DMO network, VisitEngland would have been severely challenged to deliver a product development fund of this scale. It also shows that with the 'carrot' of Government funding, less fragmentation occurs; as a result of their experience working together on the fund some DMOs have combined.

> *"DEF as a principle has been a good exercise. It needs refining, but it gets DMOs to collaborate on a market rather than competing – if you grow the market, all will benefit – a bigger cake."* DMO

> *"The Great West Way is a good example. DMOs need to realise that it's in their interests to grow the cake vs the slice, and cooperate sensibly/tactically for greater strategic gain."* Tourism Representative Body

Good practice: An excellent example of collaboration – The Great West Way

The Great West Way was one of the first initiatives to receive support from the £45m Discover England Fund, with the shared ambition of creating one of the world's premier touring routes between London and Bristol. The touring route can be travelled by road, water, bicycle or on foot and promotes an extraordinary variety of visitor experiences alongside many of England's most iconic tourist attractions including Bath, the Cotswolds, Stonehenge and Windsor.

The Great West Way has attracted investment from 270 businesses, including Bristol Airport, has taken 450 bookable products to international and domestic markets, has a network of 90 Official Tour Operators promoting Great West Way itineraries in 16 countries.

The initiative is led by Great West Way Ltd but brings together a wide range of DMO types including Business Improvement Districts, inward investment agencies, community interest companies, limited company DMOs and DMOs operating out of Local Authorities. It works with over 1,500 businesses directly and 5,000 indirectly via DMOs. There are 26 investing DMOs in total and the project is a great example of what can be achieved at scale with DMOs working collaboratively together and with VisitEngland.

In support of the Government's sustainable tourism ambitions, the team are now working on developing the Great West Way's credentials as a carbon neutral touring route.

78. **The pandemic was also cited as an important driver for DMO collaboration.** For example, DMOs worked together on intelligence gathering surveys to ensure a consistent approach to data-gathering between regions. Another good example is in the South West, where the Great South West Tourism Partnership, formed of DMOs in the region as well as business representatives, came together on a weekly basis to share impacts and insights with the Government and VisitEngland. The group also developed a recovery plan for the region – an impressive achievement, considering the South West is one of the most fragmented areas when it comes to DMO coverage.

> *"They have also developed a partnership in the South West, rising above regional politics/challenges with shared objectives/aims for the region…they came together due to C19, to do research, respond to the Pandemic, and develop a headline recovery plan for the region, at a Local Enterprise Partnership/regional level. They recognised that longer-term issues were shared and could be resolved by joint working – productivity."* Tourism Representative Body

79. **I also came across a small number of examples of DMOs in a region coming together to rationalise and standardise back-office functions.** For example, Visit East of England has, for the past three years, run internal systems for itself, Visit Norfolk and Visit Suffolk, saving the respective councils and Local Enterprise Partnership over £160,000 compared to when the DMOs operated out of Local Authority tourism service departments. This rationalisation has meant the area has been able to dedicate more energy to skills work and recruitment in the sector, as well as to marketing the region – leading to the region moving up rankings in VisitBritain's consumer sentiment survey. Similarly, earlier this year Visit Bristol and Visit Bath DMOs merged to become Visit West: a single organisation that maintains two discrete consumer-facing brands for the cities and their surrounding areas.

> *"All local DMOs with a joint marketing budget to promote the region as a whole with a new brand – 'Unexplored England'…the first time all the local DMOs and local authorities have worked together on a tourism promotion."* Local Enterprise Partnership

> *"They now have weekly meetings across the East of England – 14 DMOs, which work well."* DMO

"The…city brands will be retained – but behind the scenes there'll be one membership programme, one advertising programme, and standardised travel trade and business development delivered across the region. They've already launched a convention bureau, to take advantage of big opportunities offered by the universities/new businesses. [It] removes duplication and means two cities [work together to support] the surrounding area." DMO

Good practice: A strategic focus can yield results – Ipswich

The All About Ipswich DMO has a seat on the Ipswich Vision board alongside the MP, the local authorities, the Business Improvement District, the university, the Local Enterprise Partnership and the Chamber of Commerce. The grouping around strategy has successfully attracted £25m from the Town Deals Fund to revive the area, including over £2m to enhance digital provision in the town centre and wide region.

This is viewed as having potential to dramatically improve the reach of the DMO and improve the experience of visitors to the area. By working with local partners through the Vision coalition, the DMO will have brought substantial investment and development at no additional cost to members.

DMOs can provide some evidence to illustrate where they add value

80. **DMOs were eager to provide examples of where their activity has added value to their members and partners, as well as to wider regional bodies – and, indeed, to the experience of visitors themselves.** Despite an often-cited lack of detailed quantitative evidence about where a DMO had added value – which I examine in later on – there is nonetheless a significant body of anecdotal best practice examples of DMOs going above and beyond in their roles, often driven by the strengths, skills and personal dedication detailed above. This is particularly the case in relation to the role DMOs can play in winning major events for their area, for example by putting together a delegate package involving hoteliers, attractions, restaurants and so forth that can make the idea of hosting a conference in that destination more attractive. The role played by London and Partners during the 2012 Olympics is a very strong example of this. DMOs can also provide evidence of how many users there are of their business support products. For example, Visit Cornwall told me they've had over 1,000 businesses attend their business support webinars which help with subjects such as diversification and embracing technology. Businesses up and down the country praised their DMO as adding value as part of the review. These included the likes of Paultons Park, Beamish Museum, Chatsworth House, Castle Howard and Thameslink. But perhaps the best evidence of DMO impact is their continued existence in spite of the Government's 'hands-off' approach over the last decade.

However, much about the current DMO landscape is unfit for purpose

81. **Before looking at the weaknesses of the current landscape, I think it is worth reflecting on two points relating to the strengths listed above.** First, I did not find the strengths present in a consistent way across the country; they are present to varying degrees only. Second, where the strengths are present, they exist in no small part due to the energy and enthusiasm of DMO staff themselves. The National Government cannot take credit. Below I have set out what I consider to be the weaknesses of the current landscape, based on the evidence gathered.

The complexity and variation of the DMO landscape holds it back

82. **The current landscape is overly complicated.** There is little consistency. To be clear, my criticism is not about the fact that there is variation at all – this must always be the case because of how varied England's tourism offer is – but rather the fact that the current landscape is such a patchwork quilt that it can be extremely difficult to get one's head around and it lacks coherence. Perhaps the most

telling indication of this is the consistent difficulty I experienced in trying to get a clear answer from people as to what a DMO is and what they do. It felt at times as if I was being asked to come up with a definition myself. The fact that there are multiple answers to the 'What is a DMO' question is in my view a problem and many consultees impressed upon me the need to bring a degree of coherence to the landscape as part of the review process.

> *"The biggest problem is the definition of a DMO. Do you mean a Destination Management Organisation or Destination Marketing Organisation?"* Local Government

> *"Intellectually there should be a definition of what a DMO does and what it delivers, but that hasn't been the case in the past…the policy has not been to establish tightly what a DMO is."* VisitBritain

83. **The complexity and variation is confusing not only for DMOs themselves, but also for their users** including potential business members, potential visitors (both domestic and international – who have to navigate multiple destination websites to plan a visit) and other sectors, such as arts, culture and heritage – who, evidence suggests, find the current DMO landscape so mind-boggling that they don't know how to engage with it, or what they could gain from doing so. In turn, this makes it even harder for DMOs to do their jobs as conveners, brokers and advocates of the visitor economy. Public sector policy makers – at all levels of Government – were also clear in their evidence that definition is needed as the current landscape is so confusing as to cause disinterest. Some of the examples of duplication and fragmentation are particularly bewildering. For example, why was I told that both Lincolnshire Council and Visit Lincoln are both undertaking destination marketing activity? Why does Devon have a Visit Devon, a Visit Dartmoor, a Visit Exmoor, a Visit South Devon, a Visit Totnes, Destination Plymouth and Exeter City Council getting involved?

> *"Larger businesses at a national level will find that all DMOs are competing to get national partners, but there's no way for a larger business to partner with DMOs on a national campaign."* Tourism Representative Body

> *"[Historic England] teams don't see DMOs as a natural partner for work. Anecdotally – it's not that DMOs have nothing to offer us, it's that Historic England doesn't think to seek them out. There's a mutual lack of connection, meaning opportunities aren't taken."* Arms Length Body

> *"Alton Towers – they sit in three areas – that's crazy, you don't want to pay membership 3 times – you want something more strategic."* DMO

> ***"[We're] based in North Devon. So fractured, nothing ever gets done. Wouldn't bother us if [DMOs] weren't there. It's completely different in Cornwall – more engagement. In North Devon, [we] feel very isolated."*** Business owner

The lack of structure and extent of fragmentation exacerbates inefficient competition and weakens the power of the sector's voice

84. **The head-scratching complexity of the DMO landscape is in no small part due to its organic development over the last decade.** In the last ten years, the number of DMOs 'mushroomed' across the country but with no clear structure or strategy to follow – often leading to overlap, fragmentation and DMOs pointing in different directions. This has led to a competitive mindset among DMOs, making it harder for DMOs to collaborate and share best practice examples that would encourage regional spread, strengthen businesses, and increase the overall competitiveness of England. Moreover, fragmentation has resulted in DMOs often reliant on the goodwill and commitment of a small number of staff (remember – 62% of DMOs employ five or fewer staff members).

> *"The structure of DMOs doesn't work. No two are the same – everything from one-person bands, to totally subsidised teams of 30+, to a public sector/commercial funding blend. It makes the landscape very complex and hard to unpick – you can't say what's good/bad/in between due to their localised construct, funding, and role."* DMO

85. **I got a sense from larger DMOs engaged in more than just 'marketing' that it was particularly frustrating to see smaller DMOs continually spring up within their region.** One consultee described it as 'whack-a-mole', another that a shiver goes down their spine when a new 'Visit such and such' springs up. The reason? Brand dilution and more confusion for everyone. Local Authorities, inward investors, national tourism brands (e.g. major hotel chains, Merlin) and so on get confused about who to work with, and who to invite to the decision-making table. A significant number of written consultation respondents pressed on this, outlining their view that there are too many DMOs and this inhibits effective and efficient coordination.

> *"[The DMO] has to deal with confused structure on a day-to-day basis – for example, new DMOs setting themselves up and duplicating work)…as well as funding, we also need clarity in terms of what a DMO is."* DMO

> *"[DMOs are] missing out on coordination and structure…a piecemeal approach, all fishing in each other's ponds."* VisitEngland

86. **The lack of structure also inhibits DMOs' potential to influence and deliver national policy objectives.** As it stands, the current landscape is too variable and fragmented for the Government to be sure of a consistent approach from place to place – making it harder to rely on DMOs as a delivery partner for events and funding on a national scale, and meaning that funding available can sometimes be seen as going to the 'usual suspects' – the 'strongest' DMOs. More worryingly, the fragmentation and ensuing competition also diminishes the collective voice of the visitor economy, making it harder for DMOs to make themselves and their members heard when important decisions are being made locally, regionally and nationally and preventing a collective response or a strategic approach which would deliver economies of scale.

> *"An individual who can lead and is visionary will direct things and write bid proposals – if they can't do this, they don't get funding. This needs addressing to even the playing field – currently successful DMOs build on their success, while others languish."* DMO

> *"Structuring DMOs so they could connect to economic decision-makers, with funding and strategies would be game-changing, gaining more than would be lost."* Arms Length Body

> *"The fundamental issue isn't about marketing – it's about data, understanding the industry and getting them to work collectively together and the small interventions government needs to make to push this on strategically."* DMO

DMOs are beset by funding struggles, with funding models skewing priorities

87. **DMO funding – or the lack of it – was one of the key challenges raised across my engagement.** The consultation identified that DMO funding models are at least as complex and confusing as the structures the funding goes to support, with many respondents feeling unqualified to comment, or unclear as from where exactly DMOs get their income. The quantitative evidence suggests that this is likely due to the many different DMO legal and corporate structures and sources of funding across the private and public sectors. It is, of course, positive that many DMOs rely on private sector income – since it demonstrates commercial buy-in and allows businesses to pool resources for a common good and achieve economies of scale. However, over-reliance on membership income as public sector funding has tailed off not only left commercially-focused DMOs vulnerable when the pandemic hit, it has also led to what was described to me as the 'doughnut effect': many DMOs stated that they spend too much of their time tactically chasing membership income at the expense of the core of what they are there to do.

> ***"The Board spends too much time trying to survive, especially over the last 12 months. The Board has had some exhausting and rough rides with funding."*** DMO

> *"[DMOs] end up chasing funding and being at the behest of existing funding models."* VisitEngland

88. **Further, if funding predominantly comes from membership subscriptions, then that will skew the DMO's priorities towards what those members want.** This is fine for those that pay, but what about the smaller enterprises who cannot afford to pay the top rate of fees? Can the DMO give 'impartial' advice to potential visitors? And if the Government wants to level up, should it be satisfied that DMOs are only promoting part of their destination? Furthermore, too much time chasing funding means too little time on bigger, longer-term strategic agendas which, if addressed, would benefit the whole destination and yield long term results. Key questions, like how do we extend the tourism season to boost productivity, or how do we become a more sustainable destination, can go unanswered. A DMO cannot spend time developing a 10 year vision if it is forever worried about its survival going into the next year, and starts that year not knowing its budget.

> *"The industry wants the DMO to do what it wants (marketing). The membership body limits potential to drive bigger agendas."* DMO

> *"DMOs sometimes do not seem interested in the skills of the sector, instead focussing on marketing. As a result…they are not thinking about the future of the sector."* Local Enterprise Partnership

> *"DMOs are always looking to make money, and that can distract them from the bigger picture, rather than focussing on economic growth."* DMO

> ***"Within DMOs the top businesses have a much bigger voice, like the top 6 in the League, and everyone else has a smaller voice, leading to volatility in county tourism."*** Former Tourism Minister

89. **Respondents were clear, though, that they did not expect Government funding to replace private sector funding.** I got the sense from many that commercial income should be the predominant source, just that the balance at the moment was not quite right. What DMOs lack is a firm foundation from which to build and they struggle to get that from the private sector. It was an interesting point of reflection to me that DMOs with a healthy public/private income split were generally more stable and more strategic. For them it feels less like they are operating in quicksand. It was also interesting how many said that they did not need funding for domestic marketing as that is the bread and butter and – pandemic aside – the private sector will be able to cover those costs.

> *"[The DMO] are chasing funding but they are a social enterprise and think it is important to be publicly and privately funded….being held to account is good and [we] wouldn't be advocating for full funding by the public sector, just some core funding."* DMO

> *"Some DMOs are so small that they can't do the research and business development needed to expand and develop market intelligence and training – they focus on marketing, with buy-in from the commercial sector."* Arms Length Body

> *"Knowing resource was coming would sustain security to look forward 3-5yrs when planning campaigns, and allow for product development."* DMO

90. **From a funding perspective, much comparison was made by consultees between the present landscape and that under the Regional Development Agencies, where Regional Tourist Boards could rely on core funding.** It was interesting for me to look back at the past and see that the national Government only provided a small % of overall funding under the old models. In 2006-07, for example, DCMS provided £5.5m to the Regional Development Agencies on Tourism, but £61m was spent by them on tourism overall – showing what can be leveraged from a small amount. There was a sense of loss in relation to the demise of the Regional Development Agencies which, although not perfect, did bring a degree of clarity to the system as well as some strategic focus.

> *"RDAs allowed DMOs/destinations to have a skills/capacity audit of what was needed to build up tourism competence locally. They could recruit to provide perspective/voices strategically, rather than tactically, and could gather compelling evidence to build up investment cases for e.g. all-weather playgrounds or boutique hotels – they had a sense of what the locality needed to develop/ bloom."* Tourism Representative Body

"Regional Tourist Boards, pre-RDAs, were smooth/strong – not perfect, but gave a sense of purpose to e.g. skills agendas, channelling Govt funding, getting the sub-region to collaborate. They facilitated/enabled." Tourism Representative Body

"We are only here following the fall of the RDAs because of luck and survival instincts." DMO

91. **Another consequence of spending too much time chasing short-term funding is too little time spent looking at opportunities for income generation over the longer term.** One area that suffers here is events, which have a long time frame before they 'pay off' and generate returns. This is because of the time it takes to bid for, organise and run events, many of which only take place on an annual basis. The pay off can be significant though, not only in terms of the money spent at the event itself but also the onward consequences for inward investment. A great example was shared with me about World Mobile Congress and Barcelona. As a result of the event being won for that city and hosted there annually, the city now has a thriving telecoms industry. With some exceptions, DMOs lack the skills and understanding of the events industry to know the value they can add, lack the time and space to develop those skills, and are often reacting to queries that come in rather than going out proactively to assess potential opportunities and bring them in. And more broadly, DMO staff commitment and passion can sometimes mean that activities that could be generating income – for example, advising on planning applications, or carrying out research – is often done for free. A more ruthless, commercial mindset that put a deserved price tag on these activities could increase and diversify DMO income streams.

"DMOs could be more commercial, considering consultancy, event management, producing itineraries, content..." Tourism Representative Body

"Business events take longer to get the traction they need. Takes a bit of warming up, but there is a pay-off. It is a slow burn with sound economic principles that underpin it. DMOs need to pay the bills immediately – they therefore don't have the bandwidth to invest."
Local Enterprise Partnership

"Currently Government relies on DMO goodwill and unfunded effort. DMOs overdeliver and shout about what they do, masking the problem." DMO

92. **The issue of skills within DMOs is also exacerbated by current funding models.** This is of particular concern in relation to digital skills, a key emerging area that the tourism sector must make the most of if England is to remain competitive. Digital skills and knowledge are low in general across the tourism sector, and are not helped by DMO staff themselves lacking the expertise and the resources to help support businesses and upskill them. I lost count of the number of times I was told that DMO websites were 'poor' and I got a sense many DMOs were not sufficiently equipped to embrace opportunities like the online business to business platform TXGB or marketing via mediums such as TikTok. Furthermore, if a DMO does not know what it's annual budget is going to be at the start of the year, it stands to reason it is going to struggle to attract and maintain skilled staff.

"The danger, especially digitally, is that businesses wait for people to come – they need to look at the travel trade/US markets – the DMO connects them to these, improving productivity and providing reasons to visit the UK." DMO

"Go to Devon – no websites or poor websites." South West Roundtable

DMOs need greater incentives to support Government priorities

93. **While DMOs do recognise Government priorities, and some of the best are already pursuing work to support them, this is not the case across the board.** Many are aware of the gains that could be made by carrying out strategic work, but stressed the need for the 'carrot' of funding to incentivise them to do so – else the funding models snap them back to focus on maintaining private sector income and supporting those members that pay their bills. This is what other countries with a strong tourism offer do – they administer public funding to a limited number of especially strong DMOs operating at a

sufficiently large level to make an impact. As I set out in Chapter 1, England is a relative outlier in terms of how 'hands-off' its national Government is.

> *"A DMO can translate what's happening centrally and understand what's being done locally at a grassroots level. At the moment there's a gap between what comes out of Govt and what happens on the ground."* DMO

94. **Over 35% of those responding to the written consultation stated that the perceived absence of a national strategy or coordination function for DMOs does not help DMOs in delivering on national priorities.** The current lack of structure leaves DMOs feeling unmoored, and all pointing in different directions. The Government's Tourism Recovery Plan is a clear statement of strategic direction, and thus offers an opportunity to get the engagement and buy-in of DMOs, but the Government must do more than just publish a document. DMOs are going to struggle to work with them in partnership to deliver the Plan under the current model. A puppet master cannot operate if half the strings are broken. Furthermore, the Government will continue to face calls for a 'tourism tax' or 'visitor levy' as a way of raising public investment in the visitor economy if it does not plug the funding gap, which it has said it will not do in the Tourism Recovery Plan – rightly in my view given World Economic Forum analysis that the UK is one of the least price competitive tourist destinations in the world.[26]

> ***"There's a lack of strategy in England, a common focus on what we're trying to achieve nationally. The lack of strategy means there's not a harnessing of resources to point people in the same direction. An England strategy should be the starting point on what DMOs are trying to achieve."*** DMO

95. **One area that emerged from the consultation as ripe for collaboration was the sustainable tourism agenda.** There are many facets to this, including conservation of the natural, historic and cultural heritage, addressing the UK's 'balance of trade' deficit which sees UK nationals spend far more abroad than inbound visitors spend in the UK,[27] moving towards more sustainable business practices and understanding changes in consumer demand. DMOs are very keen to get going on this agenda, and it seems obvious to me that the Government is going to struggle to corral the vast number of businesses in the sector to engage on it without them, but currently DMOs cannot focus on it.

> *"The Council is committed to net zero. We can get our members involved and provide feedback about systems that don't work. The DMO can also be an advocate for skills – we piloted a productivity programme."* DMO

> *"We know we need to present ourselves as sustainable; having that as a pillar of work means that they then look for partners doing this. You could have a number of strategic pillars saying as a country this is what we need to work on."* DMO

96. **Place-shaping is also a strategic area where DMOs feel they could do more, with the right support; this would contribute in turn to levelling up.** DMOs know their local area better than almost anyone else, and are aware of the challenges it faces, particularly in places with high deprivation and poverty. They have the connections needed to build stronger skills networks, encourage inward investment, and support areas to regenerate, bringing visitor spend back to the destination – but at the moment, they can't dedicate the energy and resource to doing so, nor are they always able to influence the relevant decision-makers.

> ***"The visitor economy should be working hand in glove with direct inward investment into [the county]. Through visitors, they are encouraging people to live and work here, as well as visit – that will support levelling up agenda. Today's visitor is tomorrow's investor."*** DMO

> *"LEPS are currently working out what levelling up means for them…the lack of HMG clarity on its priorities means that LEPs – or DMOs – can shape them and provide some of the solutions themselves."* Local Enterprise Partnership

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[26] https://www.weforum.org/reports/the-travel-tourism-competitiveness-report-2019

[27] https://skift.com/2020/05/06/the-winners-losers-of-a-staycation-world-ahead/ suggests the UK would add 1.1% in GDP if all outbound tourism were converted to domestic.

97. **Another promising area is that of inclusive tourism.** This is important to levelling up, and the Government's Tourism Recovery Plan, rightly in my view, sets out an ambitious vision for a more accessible and inclusive tourism sector. This is particularly relevant in light of COVID, which has seen many of England's visitor destinations enjoy vast numbers of first time visitors who would normally go abroad. Again, I sense DMOs are keen to engage on this, and work with businesses to make their products more accessible, but struggle to do so due to the ever present threat of a balance sheet that does not add up.

98. **The written consultation in particular identified an issue with the diversity of DMO governance and staffing structures.** Around 10% of respondents felt compelled to raise (without prompting) that Boards could sometimes lack a diverse set of perspectives and thus feel unrepresentative of the sector. Gender and ethnic diversity were raised, but I think diversity was referred to more broadly than that. There was a sense that Boards across the visitor economy were composed of the 'usual suspects', drawn from a narrow pool, and did not take on a broader set of perspectives, including potentially new consumers. This may be why the groups to whom I spoke that are working to increase audience diversity and access for minority groups like Tourism for All, and MOSAIC Outdoors could cite only limited examples of working with DMOs. I think there is a clear opportunity for DMOs to become more diverse and inclusive, which would in turn help building welcoming destinations that cater for all visitor needs.

> *"Some want advice/guidance, some are more involved. It's patchy and hard to quantify. National Parks have seen a rise in ethnic minorities across the country. [We] can't measure impact in places, but see new and diverse audiences coming in."* Tourism Representative Body

Robust quantifiable evidence on DMO impact is lacking

99. **Bar a few, the majority of DMOs were unable to provide reliable, consistent evidence on where and how they could prove their own value add.** When pushed, DMOs tended to fall back on visitor footfall data, but this is going to reflect many factors and does not isolate the impact the DMO had. Other common measures include website traffic, social media engagement and ad clickthrough rates but these do not provide a measure of conversions. DMOs have my sympathies on this though. The only way you can really tell if someone has been influenced by a marketing campaign for example is to ask them, and I have my doubts about the extent to which people are reliable witnesses here. Perhaps this is why some DMOs talked about their role in bringing events to a destination, because here you can more clearly distinguish the role of a DMO. The problem, though, is that so few DMOs involve themselves in the event industry. This is why, for me, the best evidence of DMO value add is the continued existence of DMOs themselves. It demonstrates the market failure rationale for their existence perfectly.

> *"ACE really struggled with lack of DMO data expertise/experience. Culture is data rich, talking about audiences, while DMOs talk about visitors – these are different people in terms of evidence. They were unable to get enough data to demonstrate an impact, or plan for the future. At a local level, there's a role for DMOs to capture this data effectively."* Arms Length Body

> *"A Destination Marketing/Management Organisation doesn't have a tangible product, which makes it difficult. [We] look at ad clickthrough rates, website traffic, social media engagement etc, and ask businesses to tell the DMO where the business came from. As an example, Kathy Lettes did a Telegraph piece…a five-star B&B has had 5 bookings as a direct result."* DMO

> *"We do have [data], but it's out of date. The STEAM report – and the last one was done in 2015. It showed something like 6,000 people employed in the sector and worth £420m, which seems massive but it's an important sector here."* DMO

100. **One reflection on evidence I had is that DMOs are in somewhat of a 'Catch-22' situation.** The sector lacks the skills, experience and funding to gather robust evidence and deploy it. They are not provided with a framework that brings consistency across the country, due to the lack of coherence /

structure across the landscape. The paucity of evidence in turn makes it harder to justify giving them funding to actually go out and get the evidence. It is particularly frustrating for the pandemic to arrive just as the Discover England Fund was about to bear fruit and generate returns on investment. The promising early results were cut off by restrictions on inbound travel, limiting the products' target audiences. However, I think the quality of the products created will bear fruit as the sector recovers.

> ***"[DMOs are] so focused on short-term goals, due to funding constraints, they almost can't see the benefits of long-term investment due to the lifecycle of political reality. They need to be confident enough to base investment decisions on evidence and data"***
> Tourism Representative Body

Engagement with regional and national decision-makers needs to be more strategic

101. **I heard a significant amount of evidence that – despite the best efforts of DMOs – it is a challenge to get the voice of the visitor economy heard when important decisions are being made locally, regionally and nationally.** Engagement with Local Enterprise Partnerships in particular was often noted as an area of difficulty. This was ascribed to overlapping remits and local tensions. Many DMOs expressed frustration at what they saw as Local Enterprise Partnerships being unwilling to listen to DMOs and take on board their arguments for the importance of the visitor economy. DMOs and other contributors working in tourism often felt that the visitor economy was dismissed as a 'low productivity' sector compared to e.g. aerospace – rather than considering how to support the visitor economy to deliver higher productivity gains and regional growth. This suggests that the two thirds of DMOs who speak to Local Enterprise Partnerships on a regular basis may be knocking on a locked door. There were a few limited instances of Local Enterprise Partnerships working with DMOs once they had been convinced of the visitor economy's local value – suggesting that the lack of quantitative evidence on DMO impact may be hindering their engagement with wider decision-makers – and causing a 'chicken and egg' scenario.

> ***"Even good LEPs lack an understanding of the cultural economy or the visitor economy more broadly, compared to Local Authorities. They see it as cream teas on the Isle of Wight which harks back to the 1950s."*** Local Government

> *"Worryingly, few LEPs seem to appreciate tourism's economic significance or invest in it proportionately, or have meaningful relationships with DMOs/businesses."*
> Tourism Representative Body

> *"Covid will hopefully change the ranking of where the visitor economy is in LEPs' minds as they now see the impacts on the local economy when these businesses are shut."* DMO

> *"Where DMOs work closely with LEP Growth Hubs there is an improved business support offer for businesses in the sector and duplication is avoided allowing resource to focus on the gaps in provision."* Economic development agency

102. **Even though two in five DMOs operate as Local Authority tourism service departments, Local Authorities were similarly seen as unresponsive to their area's visitor economy**. This was sometimes ascribed to the fact that tourism is not a statutory service, so Local Authorities have no obligation to fund it. In turn, this means that Local Authorities do not involve DMOs in discussions about developments that would have wider implications for the visitor economy. This constrains DMOs' potential to influence more strategic, longer-term 'management' issues, the levers for which often sit with the relevant Local Authority (for example, transport infrastructure, licensing laws, or public realm assets like beaches). This could stem from the ongoing confusion over a clear DMO definition – the consultation analysis showed that Local Authorities in particular felt there needed to be a clearer definition of DMOs – as well as constraints on local public sector resources. From the DMO perspective, I got a sense that some did not wish to be so closely tied to their Local Authority as it risked being subject to changing political winds.

"Right now the country understands the value of tourism in a way it never has before…we understand its value at the moment. [I'm] willing to bet in a year we will be back with challenges of how to prove the value of tourism to LAs." VisitEngland

"DMOs' advocacy role with LAs/LEPs is most important – they should talk to LAs about relaxing licensing laws and advocate for LA changes that best support the recovery of the visitor economy." Tourism Representative Body

"DMOs are always a secondary actor in the place…they need to get their relationship with other organisations right. Places with weak LAs/public/private sectors struggle – how to have a DMO, let alone work well with their DMOs." Arms Length Body

103. **Mayoral Combined Authorities (MCAs) on the other hand, appeared to be able to foster more positive and productive relationships with DMOs in their area.** Cited examples included Greater Manchester and the West Midlands – perhaps unsurprising, given that in both cases the DMOs' boundaries map closely on to those of the MCA, and in both cases the DMOs work out of, or in close partnership with, the MCA. The devolved control which MCAs have over policy areas with visitor economy relevance – e.g. transport, skills, inward investment – seems to allow scaled-up collaboration with DMOs in a way that is more difficult for Local Authorities and Local Enterprise Partnerships to achieve. In turn, this allows DMOs more influence over strategic place-shaping work, ensuring that the visitor economy is recognised when important decisions are being made, and able to contribute to levelling up and increased productivity ambitions over a broader regional geography.

"The DMO model would work more successfully if it mirrored other Government structures, and its structure will be fine as long as it has power/influence and a clear governance mechanism." Local Government

"[The DMO] doesn't just do tourism, they support inward investment marketing and wider comms on the overall [area] economic strategy." DMO

"The mayors are useful – they bring huge amounts of soft power and we're lucky that our current mayor has business credibility which helps with private sector investing here." DMO

104. **Universities and education providers were also cited as a regional stakeholder group with whom DMOs could build stronger relationships.** This was both in terms of strengthening the sector skill base, offering training, and promoting tourism as a long-term and attractive career option, and also in terms of collaborative research – for example, DMOs working with their local universities on sustainability initiatives or wider place-shaping projects. While there are limited pockets where this is already happening, fragmentation and lack of resources makes it hard for universities to engage consistently with DMOs, and vice versa.

"A place based approach is vital. All tourism interests are place-based. The DMO should be a powerful hub that draws on other powers – universities, governance, private and voluntary sectors etc." Member of the public

"Universities is a key area that could be developed." Local Government

"[We] advocate very strongly, and run a visitor economy week with colleges in the region looking at training and skills and highlighting opportunities; they identify funding gaps for e.g. digital skills needs." DMO

There was criticism about the lack of formal structure/engagement between DMOs and national Government, particularly VisitEngland

105. **I encountered widespread frustration amongst DMOs with respect to their engagement with the British Tourist Authority, particularly the VisitEngland branch**. The lack of any formal relationship between DMOs and the National Tourist Board was the main complaint, with DMOs feeling disconnected, unmoored from, and indeed unaware of, the national Government's tourism policy. This

was often contrasted unfavourably with the structures employed for other sectors – for example, Arts Council England and its National Portfolio Organisations – which were felt to set clear remits and strategic objectives for the organisations delivering on the ground. In contrast, evidence suggests that many DMOs feel unclear about what VisitEngland expects from them and how that fits with a wider strategy. The relationship with the National Tourist Board was also compared unfavourably to the position in Scotland – which was regarded by multiple consultees as a better resourced and structured operation – and to the past – with many DMOs not feeling connected to a national strategy since the days of the Regional Development Agencies.

> ***"There can be a barrier between DMOs understanding what VisitEngland does and how to engage with them – and VisitEngland being close enough to see what's happening in destinations."*** DMO

> *"There is no clear steer from either VB or DCMS about what DMOs should be doing, what their function is and how it fits with the wider strategy for tourism."* Local Government

106. **It is important to stress, however, that respondents also praised the role VisitEngland played during the pandemic.** In particular, DMOs pointed to the swift distribution of funding under the two DMO resilience schemes, the regular pan-DMO calls and the introduction of a dedicated DMO Slack channel that was introduced to share advice and guidance. The VisitBritain branch also received praise, with some DMOs making good use of the international network of staff and offices to promote their brand to international audiences. Furthermore, many DMOs praised VisitEngland's research and data function, often relying on it for information on domestic and international consumers. But again, close relationships were often seen to rely on individuals' commitment, rather than a formal structure.

> *"[VE] ran a 'meet the press' event which was very useful, as was the ability to take logos/brands from the Escape the Everyday campaign and use them. [But] the 'big' DMOs get heard – [the DMO's] real interaction with VB/VE began via us setting up a meeting."* DMO

> *"With VB/VE we work in places/spaces we couldn't without them. There's a consumer filtration process…but you get out of a relationship what you put in – [the DMO] works hard with VB/VE – there's no clear/formal liaising process so it may not work for others."* DMO

107. **There was also some sympathy with VisitEngland's position.** There was widespread recognition that VisitEngland cannot engage with over 150 DMOs on an equal basis. There are too many. This links back to my reflections above about the complexity and fragmentation of the landscape – but also reflects VisitEngland's funding position. Consultees cited its lack of funding over the past decade, especially in comparison to Scotland and Wales, as preventing it from fulfilling a role that DMOs would like to see – acting as a point of contact between DMOs and national Government, providing a framework for and bringing coherence to the landscape, and working with DMOs to ensure their strategic plans align with national priorities. From some DMOs I also got the sense that they themselves lacked the time and resources to engage with VisitEngland, linking back to my earlier points on funding and prioritisation.

> ***"VisitEngland, on the other hand, are a shadow of a national tourist board and are not on the same level whatsoever as Scotland and Wales. That weakens sub-regions…and leads to DMOs 'thrashing about' trying to get business."*** DMO

> ***"My impression is that Visit Britain and Visit England are in a similar situation to my local DMO i.e. undervalued and underfunded."*** Tourism Representative Body

108. **One final reflection here is that some in the sector looked to VisitEngland to act as a 'super advocate' for the tourism sector, but I think this is a misreading of their role**. VisitEngland is an Arms Length Body of Government, directly accountable to Parliament and Ministers, and has a statutory responsibility to encourage people to holiday here and improve tourist amenities and facilities in England. VisitEngland has a statutory role to advise the Government on tourism policy but it is not a lobby group. This can be a positive for DMOs, in that there is an organisation well placed to ensure

their views and needs are incorporated into national policy making, but it does mean VisitEngland need to be discrete, and to give advice that balances an array of competing priorities. In my view DMOs themselves need to be the 'super advocates' for the tourism sector although for all the structural and funding reasons I've set out, I realise there are barriers to achieving this.

Events are an under-appreciated and under-resourced sub-sector

109. **The events industry is vital to the overall fortunes of the tourism sector.** This is recognised in the Government's Tourism Recovery Plan, which notes that business events alone are worth over £31.2 billion a year in direct visitor spending, not to mention the £165 billion of trade transacted at these events each year. A particular strength this sub-sector can offer is its ability to fill up accomodation stock in the off-season, making it an important ingredient in any attempt to improve the sector's year-round economic productivity. Business visitors are also liable to return with their families for another visit.

110. **However, I found it to be a largely unappreciated sub-sector by most DMOs.** There are some exceptions to this, such as those in Manchester, Liverpool, Birmingham, Newcastle and London, but on the whole it felt as if leisure tourism was the predominant focus. This is partly reflected in the grant funding administration data described in Figure 6 in Chapter 1 – with only 11% of DMOs making use of VisitBritain's Business Events Growth Fund. I recognise that this is likely to be driven by the structural and funding issues I outline above, which do not incentivise or facilitate a focus on activities that do not offer an immediate return (although there are business tourism activities with the potential for a quick return like incentive travel), nor do they give DMOs the time and space to upskill staff. However, when DMOs do engage they can add significant value as they are the best placed body to enhance an event by packaging together an offer for delegates that the event venue alone cannot provide. A DMO can bring hotels together to offer a discount, get local dignitaries involved to provide a welcome, bring universities or museums in if the event has relevance to their areas of expertise and so on.

Ultimately the DMO landscape is not fulfilling its potential

111. **The greatest sense of frustration I encountered was at the sense of a missed opportunity.** I refer both to the opportunity to fully realise the potential of England's many potent attack brands, and the potential of DMOs themselves to act as advocates, conveners, and shepherds, operating at the spearhead of growing regional tourism. I have outlined the reasons for this above, now I want to dwell a little on its consequences.

112. **So long as DMOs are not packing their full punch, England's offer beyond London will struggle to get onto people's radars internationally.** I do not mean to underplay the impact of the pandemic on London's visitor economy, and as the Government's Tourism Recovery Plan makes clear any recovery solution must involve London, but I do think it is worth reflecting on its pre-pandemic dominance. In 2019 London received 22 million inbound visitors. The next most visited English city was Manchester, with 1.6 million, many times lower.[28] Our gateway cities, our regional National Landscapes, and our world-class coastline need the resources and support to raise overseas awareness of everything they have to offer, and fully unleash their potent brands on international audiences. I do not think this needs to come at the expense of London though. **I want a DMO landscape able to grow the size of the entire pie – that is the essence of levelling up.**

113. **Furthermore, structural barriers holding back tourist activity outside of London are likely to remain.** So long as DMOs do not have a consistent 'seat at the table' on decisions relating to transport and infrastructure, the needs of the visitor economy will remain unrepresented. Issues that have long held international tourists back, such as the bewildering complexity of rail network ticketing, will persist. Furthermore, so long as DMOs lack the time and resources to assess and articulate issues such as seasonality and sustainability, insufficient attention will be paid to them. Key arguments, like today's tourist being tomorrow's investor, will continue to be under appreciated.

[28] https://www.visitbritain.org/town-data

114. **In the current DMO network, the Government therefore lacks a fully functioning policy lever to support its tourism agenda.** The Government has set out clear objectives around levelling up, Net Zero, and economic recovery. Tourism has huge potential to support this, not least because of how the visitor pound brings income and jobs to local communities across the country. Yet with the current DMO landscape, the Government can only rely on a subset of DMOs – and only then for them to do certain things. Most of the time I get the impression key decision-makers look elsewhere, such as to Local Authorities, because of the flaws in the current landscape that I set out above. It's past time for that to change.

Chapter 3: A way forward – Recommendations for change

It was clear from my engagement over the course of the review that all parties, not just DMOs, felt that the current landscape in England is inefficient and ineffective, when looked at as a whole. The extent of variance and fragmentation, the lack of coherence and structure, and the consequences of the national Government's 'hands-off' approach all act as a drag on the ability of DMOs to achieve their full potential.

From my discussions with Ministers, I believe the Government is serious about the swift recovery of the tourism sector and maximising its (huge) potential to contribute to the levelling up, productivity and sustainability agendas. However, for this to happen it needs DMOs to be at their best.

What does success look like?

Do we need DMOs?

115. **DMOs are here to stay.** I think it's always a good idea to start from first principles and I sought to do that over the course of this review by asking the question of whether or not DMOs are needed at all. But the question is moot. There will always be DMOs. The market forces and nature of the tourism industry make it so. That's why they exist across every region and destination in the world with a developed tourism industry and it's why they continue to operate in England despite the "hands-off" approach taken by the national Government following the abolition of the Regional Development Agencies. The real fundamental questions are instead threefold: what does a high-performing DMO deliver, under what conditions does that arise, and what is the role of the Government in creating and maintaining those conditions?

What does a high-performing DMO look like?

116. **Below I have set out what I consider to be the key features of a high-performing DMO.** This is compiled based on the many examples of best practice that were shared with me over the course of the review, and also following my reflections on all the evidence gathered. Some of England's DMOs are hitting many, or most, of these criteria, but there are many DMOs that are not, for the reasons outlined in Chapter 2.

a. **The DMO will be actively involved in destination *management*, not just marketing**. Being entirely or almost entirely a marketing organisation is fine and answers an understandable business need. However, I am trying to look at DMOs from the perspective of the national Government and their ambitions for growing tourism in every nation and region, and I believe they stand to gain far more by working with those DMOs that look at destination development in the round.

b. **Effective destination management is built around the consumer.** This is vital. The consumer does not think about where they visit in relation to bureaucratic or administrative boundaries, be they constituencies, local authorities or Local Enterprise Partnership Areas. The DMO must also be able to articulate the characteristics that make their destination unique and attractive, be able to differentiate that from others and combine it into a compelling brand.

c. **The DMO must have a clear strategic and long-term vision for how to develop their destination in line with its key strengths and ensure it remains competitive and sustainable.** This plan should have the support of relevant stakeholders. They must also keep pace with changes in consumer behaviour and preferences, to remain competitive.

d. **The DMO will act as the 'broker' and/or 'convener' for the visitor economy in the area they cover.** They will bring the full range of organisations in their geography with a stake in their visitor economy and the ability to influence it together, and mobilise them around a shared vision or strategy for enhancing the destination for visitors and business members. This should reflect and represent the local community as well as the diversity of their visitor economy. They should be true public, private and community partnerships, should be able to mediate competing interests and should have a degree of independence from local competing political interests.

e. **The DMO will be a strong and trusted advocate for their visitor economy.** This means they will have the trust of all relevant stakeholders in the destination to articulate the needs of the visitor economy. They will be able to provide strong evidence and market research to back up their assertions, including on the specific value they are able to add and the issues holding the destination back from reaching its full potential. DMOs should be able to articulate the return on investment of every pound spent. They should have a seat at the table in decisions that will affect their visitor economy: for example those around transport, inward investment, skills programmes, and application for central Government capital grants.

f. **The DMO should be well integrated with the country's overall tourism strategy.** They should understand what the national Government is seeking to achieve and orientate their strategies to deliver that (in a way that makes sense for their own visitor economy). They should have the capacity to deliver Government grant-funded or other projects if required and the national Government should be able to rely on them for an informed and up-to-date assessment of the situation on the ground. These points also apply to Mayoral Combined Authorities.

g. **The DMO will be outcome-focused and sustainable.** They should have substantive delivery plans and be focused on their delivery. Presently, a large swathe of DMOs spend a disproportionate amount of time seeking funding to survive and should become more adept at raising commercial revenues. Furthermore, too often smaller DMOs lose sight of the bigger picture and simply become vehicles to boost individual egos, creating unhealthy and unproductive fiefdoms.

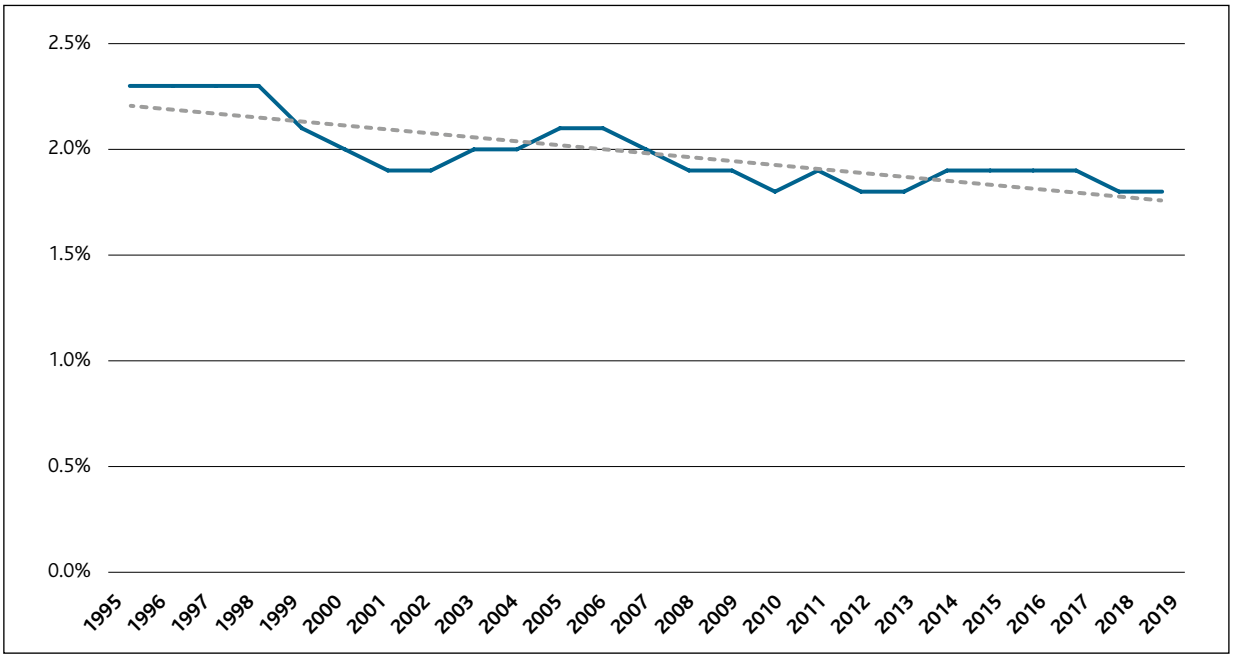
h. **The activities they undertake should match the development needs of the destination.** As we have seen, there are many different activities DMOs can and do undertake, from marketing providing support to businesses, to developing products and itineraries, providing information to visitors or acting as a convention bureau. What a DMO does precisely needs to be based on local needs first and foremost.

117. **My first set of recommendations focuses on what I think the Government needs to do to 'level up' DMOs across England so that the country is covered by a DMO network performing as set out above.** I want to see DMOs excelling across England, driving forward growth in regional tourism. This is undoubtedly a shared ambition between government, local communities and the tourism industry and I believe DMOs can provide the local leadership that is needed to fulfil the tourism sector's potential.

Recommendations for Government

118. **It is in the Government's interest to have high-performing DMOs.** As I set out right at the start of this report, the visitor economy makes a huge contribution to the UK's overall social and economic life. The number of jobs it supports is substantial, as is its impact on the country's overall wellbeing. Tourism is an internationally competitive industry, and the UK should be striving to at a minimum to retain its market share, but this hasn't happened over the last decade with the UK slipping down the overall visitor rankings. For example, between 2011-12 and 2018-19 the UK's international arrivals grew by 27% – obviously good news but ultimately slower than the world average (29%) over that period and slower than many competitor countries such as Germany (33%).[29] Market share has also declined, as the chart below shows. The story of English tourism in recent times is one of decent performance, but also of unfulfilled potential. If DMOs, as a crucial cog in the tourism ecosystem, are not functioning at their potential best, then this will affect the sector as a whole. Given how much the UK has to offer, we should not be satisfied that France gets more than double the number of international visitors we do each year.

Figure 7: UK share of total inbound world arrivals 1995 to 2019



119. **The pandemic has highlighted how important England's DMOs are to the Government.** There were many examples pre-pandemic of the Government working with DMOs – with two out of three DMOs having administered or bid for Government funding in recent times and an average of £500,000 pushed through them over the last three years – but the pandemic has seen the Government rely more heavily than usual on DMOs for information, intelligence, and business support. The national Government needs DMOs as an intermediary between them and the 230,000 tourism businesses across the country. However, this review has found that the DMO landscape is fundamentally not cohesive enough to support Government policy in all parts of the country consistently and effectively. Equally it was not lost on me that the overall lack of cohesion means that the advocacy of DMOs for their visitor economies is far less effective than it could be – their collective voice is diluted by the fragmentation.

120. **I am convinced that the national Government can and should be playing a greater role than it currently does to support DMOs.** Many DMOs certainly have the appetite to reach the performance level I set out above, but I do not think they alone can solve the problems of fragmentation, funding, structure and performance that I found in my review. Indeed, if DMOs were to try and solve this problem themselves without Government intervention I am convinced it would only exacerbate the differences, not heal them, as the last decade has shown. And where would they get the money from?

[29] Source: World Bank Figures: https://data.worldbank.org/indicator/ST.INT.ARVL?most_recent_value_desc=true

121. **I am also convinced that a wholesale change in approach is needed, rather than small tweaks. This will require the Government to provide funding.** It is essential, however, for DMOs to continue to receive the lion's share of their funding from the private sector but an over-reliance on this means priorities will ultimately always be skewed towards destination marketing and away from destination management. Furthermore, there will not be a sufficient focus on longer term issues and revenue raising activities. The Government also cannot expect DMOs to lean into national priorities if it is not going to work collaboratively with them or help them recover from their fragile state as they emerge from the pandemic. Incentivising strong DMOs with core funding seems the most effective way of achieving this.

122. **However, if the Government decides to play a greater role, it must be careful.** It is certainly conceivable that Government intervention could exacerbate existing issues, or create new ones, if mis-handled. In particular, it must appreciate that the diversity and breadth of England's offer is a fundamental strength and not impose a uniform one-size-fits-all solution that treats every destination as having the same needs. It must also appreciate that the consumer should come first and so should not try to fit DMOs neatly into existing administrative structures. Finally, if it decides to provide funding it must also hold DMOs to account for delivery. My recommendations are designed with these considerations in mind.

Recommendation 1: The Government should bring coherence to England's DMO landscape via a tiering approach, using an accreditation process to create a national portfolio of high performing Destination Management Organisations that meet certain criteria. I would also suggest a move away from the confusing 'DMO' term and call these nationally accredited Tourist Boards.

Recommendation 2a: The national portfolio should then be split into two tiers – a top tier of accredited Tourist Boards acting as 'Destination Development Partnerships' or as leaders of them (these could be described as 'hubs') and a second tier of accredited Tourist Boards acting as members of these Partnerships ('spokes').

Destination Development Partnership status could be awarded to either an individual accredited Tourist Board covering a large enough geography (e.g. a city region) or to a coalition of willing accredited Tourist Boards within an area that come together under a lead Board.

Recommendation 2b: The Government should then provide core funding to each Destination Development Partnership. The funding should be focused on activities that ensure their destination remains sustainable, competitive and responsive to high level strategic challenges identified by the Government such as those around sustainability, skills, inclusive tourism and levelling up. The Destination Development Partnership would be expected to pass down a degree of funding to accredited Tourist Boards amongst its coalition and work collaboratively with them to deliver a shared vision.

Recommendation 3: DMOs that do not meet the national accreditation criteria should be automatically considered as part of a 'third tier'. These are likely to be small, localised Destination Marketing Organisations and the Government should minimise its engagement with them.

123. **I have deliberately presented these recommendations together as they interlink and should be considered in the round.** At the outset I should note the key point that a nationally accredited Tourist Board could be either the leader of a Destination Development Partnership or a member of one. To illustrate this point, I'll use the example of the North East, following feedback from participants at the North East Roundtable about the willingness of DMOs in that area to collaborate. Under my recommendation Newcastle Gateshead Initiative, were it to fulfil all the relevant accreditation criteria, could end up badging itself as an accredited Tourist Board, and leader of the North East Destination Development Partnership.[30] Visit County Durham might also badge itself as an accredited Tourist Board and also describe itself as a *member* of the North East Destination Development Partnership. The Alnwick Tourism Association (Visit Alnwick), which concerns itself for the most part with tourism promotion, would continue to do so, but without being accredited.

[30] Recommendation 4 sets out my views on who should do the accreditation.

Tiering

124. **Support for a tiered approach to labelling and structuring DMOs was a consistent feature across all the evidence gathered.** A greater distinction between marketing and management was a particularly strong request, and many representations were received citing the National Portfolio Organisation model adopted by Arts Council England as one that could be mirrored for DMOs. A plea for some degree of coherence and structure, without eroding what works well, came from all sides – DMOs, National Parks, politicians and representatives of all levels of government, businesses and so forth.

125. **At the top of the tier would be individual accredited Tourist Boards, or coalitions of them, acquiring the status of a Destination Development Partnership**. Destination Development Partnerships must be built around a proposition and destination that makes sense to the consumer. I see these as being 'hubs' and would expect them to cover the whole of England. At a minimum level they should be the size of a county or city region, but they could conceivably cover a larger region. There are already a number of regional coalitions, of varying purpose and structure, in operation such as Visit East of England. However, this is not a case of going back to the past model of Regional Tourist Boards. In some parts of the country, like the North West, it's not going to be possible anymore for the likes of Manchester and Liverpool to join together under one big coalition – they have both proven over the last decade that they are powerful brands in their own right, capable of packing the kind of punch I would like to see from the top tier.

126. **Destination Development Partnerships should receive multi-year core funding from the central Government to undertake specific activities.** These activities should include:

- **Developing a Destination Development Plan**, outlining regional priorities for the visitor economy in the area covered and addressing Government priorities as well as the themes outlined in the UK Government's Tourism Recovery Plan such as:
  - **Regional growth** (with tourism growing across a region rather than just in the honeypots, with visitors staying longer and spending more)
  - **Levelling Up** (encouraging dispersal to lesser-known destinations; promoting sector employment)
  - **Destination sustainability** (visitor management, encouraging positive and avoiding negative environmental impacts, conservation of England's cultural, natural and historic heritage)
  - **Productivity** (providing longer-term skills and careers, addressing seasonality, improving digital and transport connectivity)
  - **Accessibility/inclusion** (attracting more diverse audiences, improving accessibility across the area)
  - **Targeting key international markets**
  - Encouraging **inward investment** in the visitor economy
- **Advocating for the destination's visitor economy.** The Partnership would be responsible for ensuring the visitor economy is integrated into wider economic strategies, for advising on infrastructure developments such as transportation proposals or new attractions and for encouraging inward investment into visitor economy sectors. The Partnership would act as the main conduit of information between the national Government and more local DMOs.
- **Partnership working.** The Partnership would be expected to work particularly closely with accredited Tourist Boards within their area, and would need to engage all relevant partners (including local government, Local Enterprise Partnerships, universities, commercial businesses, cultural organisations) in the development of their Destination Plan.
- **Bidding for funding / advising on funding bids.** I would expect the Partnership to work with accredited Tourist Boards in bidding for funding opportunities made available by the national Government. Recent examples of funds that might be appropriate include the Towns Fund and

the Discover England Fund. If another party was a more appropriate bidder, such as the District or County Council (e.g. for something like the Levelling Up Fund), I would expect the Partnership to advise on any bid with relevance to the visitor economy.

- **Product development.** I would expect the Partnership to drive regional tourism product development, working with accredited Tourist Boards, other stakeholders and potentially other Partnerships to provide a cohesive visitor offer in the form of travel itineraries, integrated transport passes, new visitor experiences, and so forth. The Discover England Fund offers a strong platform for this in every region of England, and has been a catalyst for collaboration across the visitor economy.
- **Engagement on major events or projects.** The Partnership should act as a champion for bringing major events – business, cultural, sporting and so on – to the region. They could also advise on the application of major national events to the area's visitor economy, such as the forthcoming Festival 2022 or the Queen's Baton Relay for the Commonwealth Games. They could provide strong support to bids for opportunities such as the UK City of Culture competition. They should be expected to work closely with MeetEngland at a national level to share and service event enquiries, ensuring these remain within England rather than being lost to competitor countries. There is no room for a parochial outlook across the DMO landscape.
- **Data collection and sharing.** The Partnership would be expected to collect and analyse data on the visitor economy, acting as centres of excellence, working with VisitEngland to ensure a robust and consistent approach. They should be able to articulate crisply the area's volume and value in terms of visitor spend, number of jobs supported by the visitor economy and its wider impact. The Tourism Data Hub referenced in the Tourism Recovery Plan (and referred to in Recommendation 6 below) could help with this.
- **Business support.** As part of their advocacy and information-sharing remit, and working in partnership with accredited Tourist Boards, Partnerships would be expected to inform the development of and encourage participation in VisitEngland business support initiatives (such as Taking England to the World or the TXGB business to business platform), as well as source and share wider skills and development opportunities for businesses.

127. **In the second tier would be a range of accredited Tourist Boards, all members of a Destination Development Partnership.** To become accredited, a DMO would need to meet certain criteria, which should be set by the National Government; VisitEngland would be well placed to assess and award accreditation. If a DMO is unable to demonstrate the criteria or does not wish to then they would not be able to receive the accreditation. Criteria might include:

- Being able to demonstrate the resources and performance history to deliver the Destination Development Plan led by the Partnership under which they would sit.
- Having strong existing connections to commercial sector partners and wider regional bodies such as LEPs and universities.
- Having a coherent and compelling visitor offer and brand narrative, and a strong track record of promoting it to domestic audiences.
- Being able to roll out and signpost business support programmes
- Understanding the needs and opportunities of their local visitor economy, and being able to advise on planning decisions and events in response to these.
- A commitment to sharing intelligence with their Partnership, and working in collaboration with them.

128. **In the third tier would be the remainder of unaccredited DMOs, which I largely anticipate as being those with primarily a marketing focus.** These organisations have their place, clearly as they continue to exist with the support of local businesses, but there has got to be a formal distinction between management and marketing. I do not think small, local Destination Marketing Organisations have the capacity, scope or, in some cases, desire, to carry out work to support the national

Government's overall tourism policy, nor do they have the heft to really drive forward a destination's visitor economy across all its facets. It is the case across the world that local, marketing-focused DMOs are largely left to their own devices and I think it's fine for that to be the case in England too. These DMOs could always aspire to become an accredited member of the national portfolio and achieve official Tourist Board status and the Destination Development Partnership sitting above them could nurture them to reach this stage. It may also be the case that some of these organisations wither, as businesses gravitate towards accredited Tourist Boards.

Figure 8: Approximation of current incoherent DMO landscape

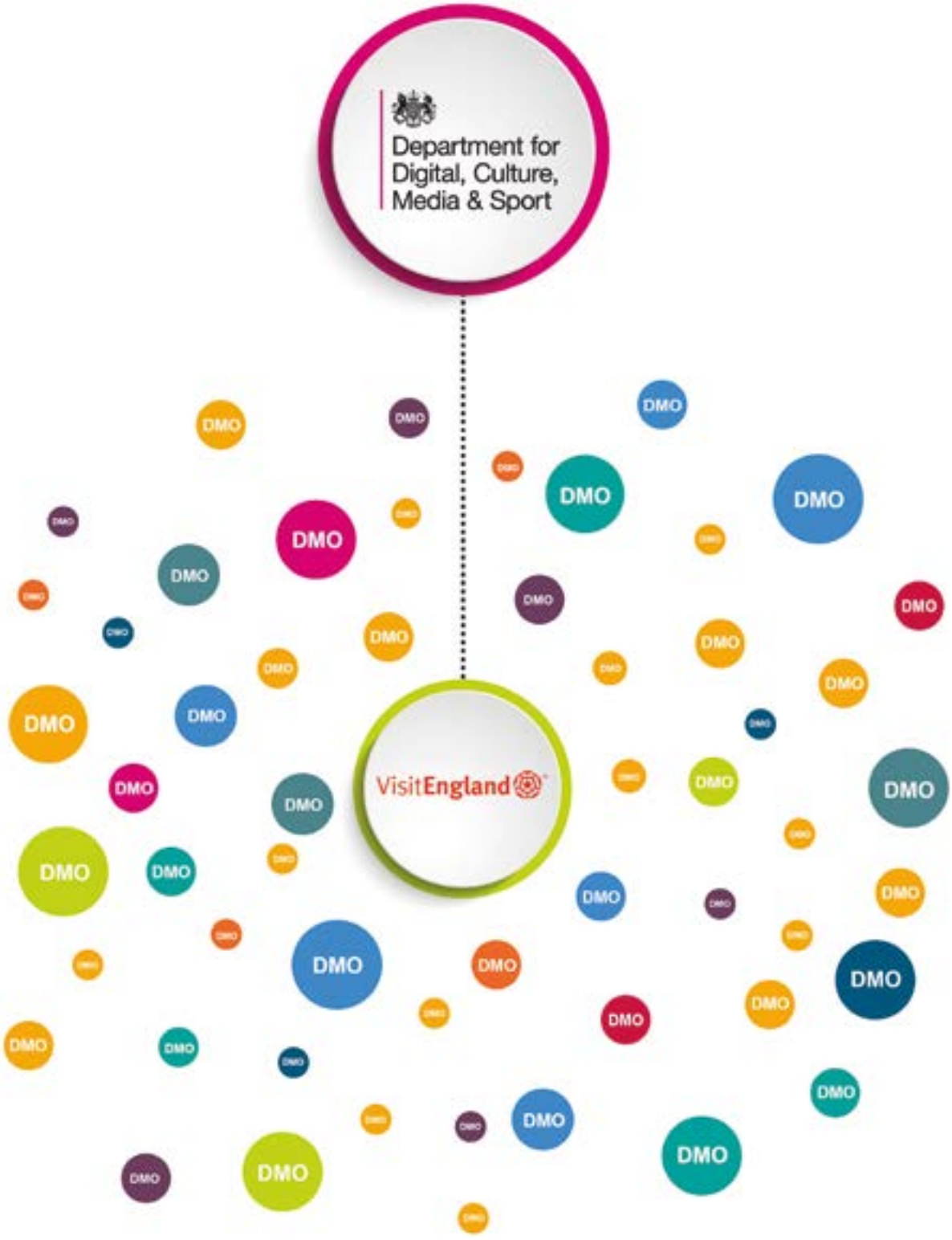
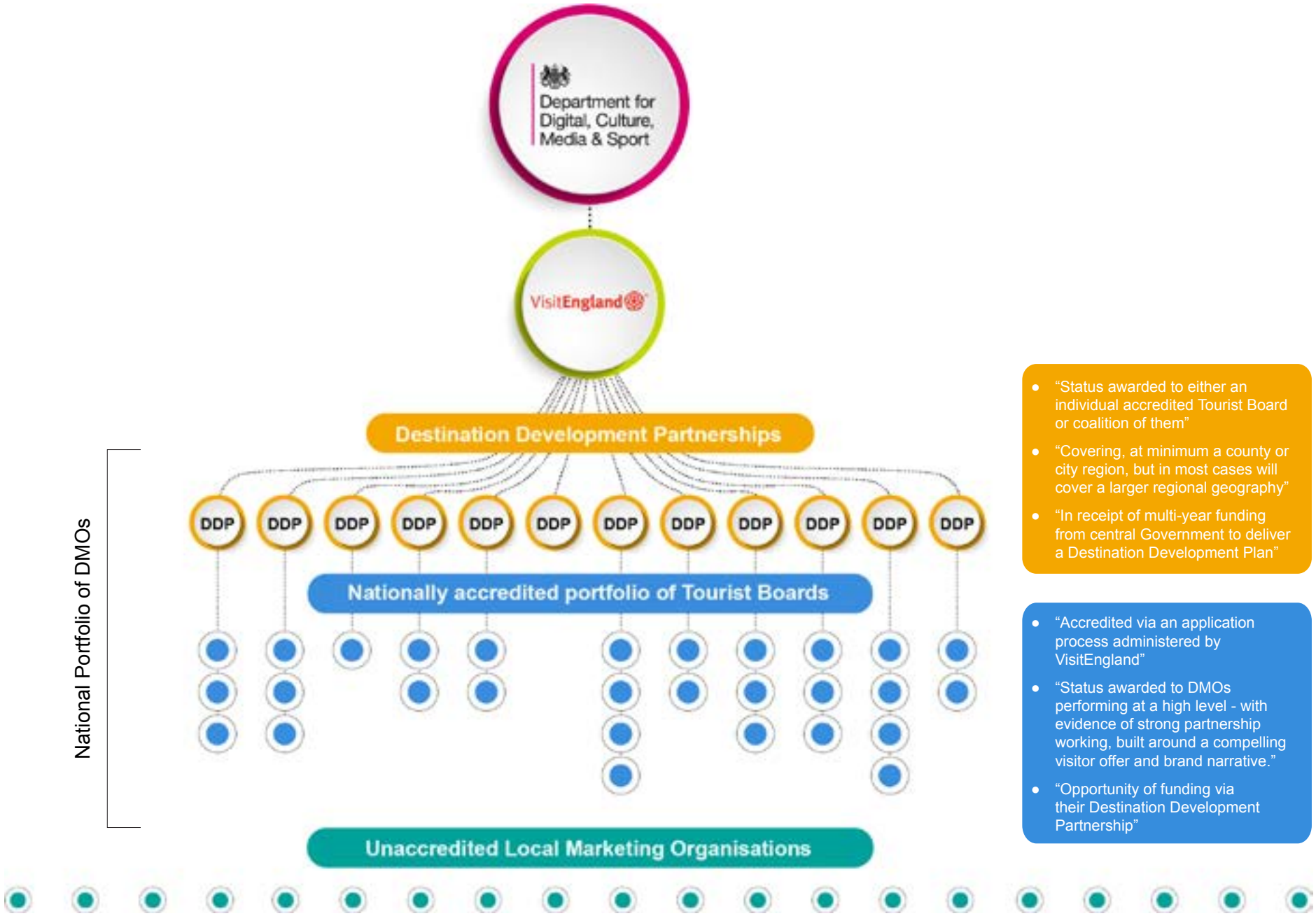


Figure 9: Approximation of what the DMO landscape would look like under my proposals



How my tiering proposals would work in practice

Funding

129. **I envisage Destination Development Partnerships being able to receive multi-year core funding as a grant from the central Government in order to deliver the activities I outline above.** In Recommendation 4, I set out why I think this should be accessed via an application process administered by VisitEngland. As part of the process, I would expect the Partnership to demonstrate an ability to secure commercial sector funding and for Local Authority funding to continue, albeit more likely on an ad-hoc project basis. I do not think the core funding should be able to be used for marketing activity; this should come from the commercial sector. Funding settlements would need to be multi-year, three at a minimum, to give certainty and reflect the time it takes to develop destinations and tourism products.

130. **I do not envisage a direct *core* funding relationship between national Government and the second tier of accredited Tourist Boards**, but I certainly envisage the Destination Development Partnership allocating a portion of its funding to the accredited Tourist Boards that make up its membership, if doing so was appropriate in order to deliver the Destination Development Plan in collaboration. A similar handing down of funding occurred under the old Regional Development Agency model. Ultimately I see the funding from the central Government as a means of shoring up the foundations from which the lead Tourist Board for the Partnership and the accredited Tourist Boards sitting within and beneath it can build on and leverage to reach their full potential.

131. **It would be for the Government to determine the amount of funding to provide each Partnership, should it agree to implement my recommendations.** The amount given should be as needed to deliver the objectives outlined above. In the main I expect this to be staff costs, e.g. a DMO bringing in someone to proactively go after event leads, engage the international travel trade or be focused on developing business skills, but there will also be other costs for running events, upgrading back office systems and so forth. The Government will need to devise an equitable formula that allocates funding fairly to each Partnership however. I do not think it is the case that each Partnership will end up getting the same amount, as each will cover geographies of different sizes and have different challenges. The Government may then wish to consider discrete challenge or project funds that Partnerships can bid into, akin to the Discover England Fund.

Bidding and accreditation process

132. **Acquisition of Destination Development Partnership status should be achieved via an application process administered by VisitEngland.** I would expect DMOs to self-select their geographical footprint, given how vital it is for DMO structures to be built around the consumer and the importance of local knowledge in determining that. However, there should be a minimal size expectation of roughly county/city region size, a push for regional coalitions, and the economic value of the local visitor economy should also be a factor. It was apparent to me over the review, particularly during the regional roundtables, that there was a lot of appetite in a number of areas for strong regional coalitions of DMOs with their horizons set beyond just marketing. But it was also apparent that a number of areas, particularly the city regions, felt they had effective attack brands and identities that could be diluted through collaboration. The flexibility I've proposed recognises this, and mitigates a 'one-size-fits-all' model that would be sub-optimal. Fundamentally Partnerships should sit at the biggest logical geography and I would anticipate a maximum of between 20 and 25.

133. **I would expect VisitEngland to ensure that there is minimal geographical overlap in responsibilities between Partnerships.** They should also seek to ensure full coverage of England, and push bidders to consider expanding their geography if areas are uncovered: for example a city might be asked to expand to cover an entire city region. From a visitor perspective, I would be keen to avoid introducing 'hard borders' between Partnerships. There will likely need to be a degree of 'fuzzy borders', but designed in such a way as to reduce any parochialism and encourage collaboration between Partnerships, for example in product development.

134. **Transportation hubs should be a key consideration in any Destination Development Partnership.** Transport infrastructure and connections are vital components of the visitor economy. Airports, for example, can be important contributors to DMOs as they understand that a strong visitor brand with international appeal will increase their own business.

135. **Whilst VisitEngland would be well placed to design a framework for what an accredited Tourist Board might look like, they may not be the best body to actually accredit these organisations.** The Government would need to decide who is most appropriate to conduct this role. It may be that the Destination Development Partnership accredits Tourist Boards based on a nationally consistent framework. I anticipate there being around 40 accredited Tourist Boards making up the national portfolio. I consider it essential that there would be a focus on consolidation during this process. Taking Devon as an example – as one of the most fragmented parts of the country – I would not want to see Visit Devon, Visit Exmoor, Visit Dartmoor, Visit South Devon, Visit Totnes, the tourism department of Exeter City Council, Destination Plymouth and so forth all receive accredited status.

Governance and accountability

136. **I would anticipate Destination Development Partnerships having governance arrangements that fully reflect their regional economies.** Fundamentally, the provision of government funding necessitates the need for a structure that can be held to account for how that money is spent. Key partners will include local government, relevant Local Enterprise Partnerships, universities, cultural and heritage organisations, National Landscapes and so forth. Representatives from accredited Tourist Boards within the geography should also play a role. It will also be critical that there is no opportunity for Partnerships to become inward looking talking shops for DMO professionals and local government agencies. I believe the best method of ensuring that is to have at least 50% of the main governing board made up of private sector representatives to ensure this critical voice is represented.

137. **Destination Development Partnerships would need to be held to account for delivery.** VisitEngland should administer the process and they should also be responsible for monitoring and assessment. Target outputs, outcomes, and Key Performance Indicators for measuring progress against these would need to be included in any plan and could include quantitative measures around increasing visitor spending, accommodation occupancy all year round, visitor dispersal, visitor satisfaction and business engagement in sector training or skills programmes. Both Partnerships and accredited Tourist Boards would need to recognise that what is awarded could also be removed if these outputs are not delivered to time, and public money is not used effectively.

Advantages of a tiering system

138. **The approach I suggest seeks to strike a balance between bringing a degree of coherence and structure to the English DMO landscape, whilst also avoiding the imposition of an inflexible 'one size fits all' approach from the top down.** It would provide the national Government with a smaller, more strategic and more accountable group of DMOs with which to work, and would start the process of pointing them in the same direction. The Government focuses on the top tier. Over time I think it would reduce the number of DMOs operating by reducing churn in the system, putting existing DMOs on a more sustainable funding footing and thereby reducing the openings available and incentives for new DMOs to form. My hope is that the proposals would be able to fully unlock the potential of those DMOs that understand destination management is about more than just bringing the visitor into a place and that tiering would encourage gravitation towards those with accredited status.

139. **This is not about creating a new bureaucracy.** It became clear to me over the course of the review that whilst the current landscape is not one anybody would have designed, we could not start afresh either. My aim is to recognise and build on what works well hence why I have not recommended that the Government creates new DMOs or an awkward, forced arrangement whereby they would be embedded in local government. I believe the recommendations are in keeping with best practice internationally, and what was reported throughout the review to have worked well in the past, without

turning the clock back completely. The emergence of city regions as strong 'attack brands' is one reason why we cannot just go back to Regional Development Agencies and Regional Tourist Boards, as is the emergence of Local Enterprise Partnerships and Mayoral Combined Authorities. However, I do think the English landscape has lost something in no longer having the regional role that these used to fill and what I am trying to do ultimately is set up a series of DMOs of appropriate size and statute to pack the most substantial punch.

140. **The proposals should help drive up collaboration, efficiency and accountability.** There would be a clear flow of strategic direction – from national Government to VisitEngland, then to Destination Development Partnerships and down to accredited Tourist Boards within the national portfolio. It is entirely plausible that the Partnership could run all back office functions for the accredited Tourist Boards within its area, building on good developments we've seen along these lines in recent years such as in Bath/Bristol and the East of England. This could also include investment in digital technologies that would otherwise be difficult to achieve without economies of scale.

141. **A clear, robust accreditation process would help DMOs fulfill their potential as champions, advocates and leaders for their visitor economy.** Organisations such as the Arts Council, Historic England and Local Enterprise Partnerships would have a single point of reference for collaboration, advice and insight. Businesses and consumers should also experience greater clarity. Commercially a Destination Development Partnership also helps answer the question posed by larger businesses in the sector, such as airports, train companies or large hotel chains, of 'who do I speak to?'; these businesses do not want to manage relationships with multiple organisations across a relatively small geographical landscape.

142. **DMOs would now know what the Government wants from them, and the Government will gain a valuable network through which it can confidently deliver tourism policy.** But this will only be the case if the Government is willing to support the proposals with funding for the sorts of activities I outline (whilst also insisting that other activities, like marketing, be funded from other sources). Put bluntly, the Government is not going to get 230,000 tourism businesses engaging in the Net Zero agenda without acting through DMOs but unless the Government is willing to recognise it has a part to play DMOs are not going to lean in to their agenda. Fragmentation will persist and DMOs will remain overly focused on their members' priorities. Furthermore, the Government has promised as part of its Tourism Recovery Plan to consult on a Tourist Accommodation Registration Scheme in England. This is a good example of something that the current DMO landscape would struggle to deliver successfully, due to its overall lack of consistency and comparable performance from area to area.[31] I note that in other policy areas there are similar networks to what I am proposing that the Government has at its disposal and uses, such as the Growth Hub network or National Portfolio Organisation model deployed by Arts Council England.

143. **Nothing in the new structure would prevent individual DMOs or Partnerships working together on areas of shared interest, i.e. developing a touring itinerary.** Indeed, I expect that the new structure would encourage this kind of partnership working across England, since Partnerships would provide a clear channel through which to initiate and continue it. If two or more Partnerships felt that collaboration on a project might be of mutual benefit to both, then they could do so and pool some of their budget to fund it. We have seen good examples of this sort of collaboration in recent years through the Discover England Fund, such as the England Originals project bringing together historic cities on a thematic basis or the Growing Manchester as a Gateway project which connects DMOs across the North.

144. **Further, there is nothing in the proposed structure that would restrict DMOs from engaging in other activities.** We've seen in places like Manchester and London that the DMO is part of a wider organisation dealing with matters such as inward investment outside the visitor economy, promoting universities and so forth. My intention is that the proposed new structure would only make such activities easier to carry out, and as such are to be encouraged.

[31] It would also have the benefit of significantly improving a destination's understanding of all the accommodation businesses in its destination – meaning a better evidence base and ability to engage with them.

145. **By bringing in a source of sustainable funding I would hope to free DMOs from constantly chasing money in order to ensure their survival.** With a degree of certainty as to budget at the beginning of each financial year, DMOs would have the breathing space to enable staff to focus on all aspects of destination management, to tackle the barriers holding the destination back and to ensure the destination remains competitive and sustainable. It would enable them to attend to the destination in its entirety, not just to the interests of the highest paying members. The pandemic has also highlighted the fragility of an entirely, or almost entirely, membership fee based model and this could be the case for some time as businesses rebuild their resources.

146. **Finally, I do think it is important to move away from the 'DMO' acronym**. 'Tourist Board' is one option but I am not wedded to it. It is a phrase that already exists in common parlance and it is used to describe VisitEngland/VisitBritain at a national level. Its main strength, as far as I'm concerned, is that it would give policy makers and the public a much greater sense of what the DMO is and does, although I do appreciate it has a somewhat archaic and stuffy feel.

Recommendation 4: As it is England's National Tourist Board, with the statutory responsibility for growing tourism at an England level, the Government should charge VisitEngland with responsibility for creating, maintaining and supporting this new tiered structure. It should receive sufficient funding and resources to do this.

147. **The proposed tiered approach will require significant effort to put in place and oversee. In my view, VisitEngland is the best positioned body to lead this.** VisitEngland is the trading name of the English Tourist Board. Its powers and functions are set out in the Development of Tourism Act 1969, and include all that would be needed to deliver the proposed framework. VisitEngland staff have the expertise needed to oversee the proposed structure, as well as the most applicable statutory duty – in their case it is encouraging the growth of English tourism. No new legislation would be needed to put the new structure in place, which is welcome so as to ensure their speedy implementation. However there is a case to be made that over time these changes could be embedded in law so as to ensure a longer term period of stability for tourism and the DMO landscape, by making it harder for a new administration to cancel the programme.

148. **The proposals would benefit VisitEngland.** As written evidence demonstrated, there are far too many DMOs at the moment for VisitEngland to engage fruitfully with. The consistency and standardisation of a tiered structure would enable VisitEngland to engage with those most relevant to their own objectives, and all DMOs would know where they stand relative to one another. VisitEngland would be able to double down on the successful engagement they have had with DMOs over the course of the pandemic, through schemes such as Good to Go.

149. **Nevertheless, the Government should not expect VisitEngland to deliver and support the new tiered system from within its current resources.** Under its current budget, it is largely limited to a business support and research/analysis role. Once these valuable activities, such as running quality assessment schemes or the Great British Tourism Survey, are accounted for there is not much left. A consistent theme across all consultees was a sense that VisitEngland is underfunded and under supported relative to Scottish and Welsh comparators, and has been so for some time. There is merit in this – VisitScotland's annual report and accounts for 2020 show it got a resource grant-in-aid from the Scottish Government that year of £54.36m[32] whereas the equivalent for VisitEngland for 2019-20 was £14.9m (with £5.45m of that for the Discover England Fund which has subsequently been discontinued).[33] There was a recognition that VisitEngland could not play the national coordination and leadership role for which DMOs are crying out, because it is not currently resourced to do so.

[32] See page 55 of: https://www.visitscotland.org/binaries/content/assets/dot-org/pdf/annual-and-corporate-reports/annual-report-2020.pdf

[33] See page 28 of: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945843/CCS001_CCS0620685730-001_BTA_ARA_2019-20_Web_Accessible.pdf

150. **The government should therefore ensure that VisitEngland has the budget to play its part in delivering this new framework.** By this I do not just mean the process of administering applications for accredited Tourist Board and Destination Development Partnership status and then monitoring and evaluating. There are other ways in which VisitEngland could add value. In particular, VisitEngland could provide the means by which best practice across the country is shared and discussed, they should be playing a lead role on ensuring standardisation in data and evidence, and they should be the go-to source for advising on articulating the Government's tourism policy and priorities for England. The VisitEngland business events team could also support Destination Development Partnerships by acting as a central bureau for event enquiries, information and referrals, and by collaborating on a strategic plan for winning events in England.

Recommendation 5: The Government must also change its approach, in order to maximise the success of the new system. There is currently insufficient appreciation of the importance and promise of the visitor economy at the top of government, leading to unfilled potential in DMOs and the wider tourism landscape. In practice, responsibility for tourism policy cuts across multiple departments, creating a confusing picture. Practical measures to address these issues could include elevating the Tourism Minister to a Minister of State position and either reallocating responsibilities from other departments to sit under that Minister or making the Minister responsible for the activities of teams within multiple departments – this latter suggestion is an established practice already in other policy areas which cut across Whitehall departments.

151. **There was a strong sense throughout the review that tourism is not given the prominence it deserves by the UK government (of all colours).** This sense came from former Tourism Ministers, DMOs themselves, businesses and others. In particular, it was felt that tourism and the visitor economy more generally was taken for granted – an industry that will grow by itself and does not require government intervention. That mindset has to change across the Government.

152. **COVID, however, has helped focus minds.** The impact of the pandemic on the visitor economy has been significant and interventions such as the VAT cut and the furlough scheme have been crucial. The Government's recently published Tourism Recovery Plan is a promising development, as is the decision to commission this review, and I think the Government understands that if it wants to maximise tourism's contribution to the levelling up and sustainability agendas it has to be more 'hands-on'.

153. **However the sector needs to hold the Government's feet to the fire.** Whilst the current Tourism Minister was widely praised by contributors to the review for his handling of the pandemic, many noted he was one of four in recent years – which the sector has taken as a sign about the seriousness with which they are viewed. I have already referred to the paucity of the VisitEngland budget compared to Scotland's, and similar comparisons can be made between VisitBritain's budget and its competitor tourist boards, for example Tourism Ireland spends double what Britain does in the USA. Many contributors praised the 2019 Tourism Sector Deal as an important development, but noted there was limited funding attached to it and that some headline proposals, such as Tourism Zones, had not been implemented.

154. **Although the DMO landscape can be confusing, who is responsible for what in Government when it comes to tourism policy can be confusing too.** Just as it is hard for a tourism business to know who they can pick up the phone to in the current fragmented landscape, it can be hard for DMOs to know where to go in Government if they want to impact tourism policy. Whilst 'tourism' currently sits within DCMS, responsibility for the policy levers affecting tourism policy are spread far and wide across Government – the Treasury leads on taxation, the Home Office on visas, the Department for Transport on all forms of transport and inbound travel, the Department for Business on consumer protection… the list goes on. The Minister responsible for tourism does not control many of the policy levers. As a practical step to make it clearer who is responsible for what, the Government should consider bringing together teams with responsibility for tourism policy together under one Minister. It was interesting to see both Scotland and Wales recently move responsibility for tourism policy into new departments. One model might be the Cities and Local Growth Unit, which spans two Departments and co-locates policy

teams responsible for economic growth. The Tourism Recovery Plan's stated intention to create an inter-Ministerial group for Tourism is a welcome proposal but in my experience not enough on its own to meet the challenge of cross-departmental collaboration within the national Government; there needs to be a structure of officials sitting beneath it with clear lines of accountability to deliver Ministerial decisions.

Recommendation 6: In order to help DMOs and Local Authorities take decisions on how best to develop the visitor economy in their local area, the Government should improve access to quality data by introducing the proposed Tourism Data Hub as a matter of urgency.

155. **The Tourism Recovery Plan includes a commitment to explore the benefits of a Tourism Data Hub, first referenced in the Tourism Sector Deal in 2019.** As the Plan describes, such a Hub could help address the dearth of reliable and robust data found on the tourism sector throughout this review – particularly at a local and regional level. The Hub's intention to provide real-time data on consumer behaviour, bookings, and longer-term trends would be a massive game-changer. This in turn could be used to provide Destination Development Partnerships and accredited Tourist Boards with useful insights for planning their regional and local activities. With this in mind, the government should prioritise the development of such a Data Hub at the earliest opportunity.

Recommendations for DMOs

156. **DMOs themselves also have a role to play in addressing the barriers preventing the DMO landscape as a whole from fulfilling its potential.** Even though my main recommendations relate to the Government, it cannot just be left to them. The review raised a number of themes and issues that warrant critical reflection from those DMOs themselves that find themselves accredited. Given the torrid time tourism has faced since the pandemic began, it was heartening to find across the country a huge amount of passion and commitment from people working in DMOs. There is no shortage of enthusiasm, but that alone will not be enough to create the conditions that will allow regional tourism to recover and thrive.

Recommendation 7: DMOs must accept that they also have a role to play in driving forward change; it cannot just be left to the Government. To maximise the success of the new structure I have outlined, DMOs will need to take a less territorial approach, have a greater focus on collaboration, and recognise that the current fragmentation is holding them back from acting as effective advocates for the visitor economy.

157. **At the centre of this recommendation is my finding that the fragmentation and confusion of the DMO landscape does itself no favours.** A consistent theme across the review, whether I was engaging with public sector policy makers (at all tiers of Government) or private sector businesses, was that the DMO landscape was too opaque, duplicative without apparent good reason and overly confusing. Speaking as a former MP and Government special advisor, I know how important time is to public sector decision makers. The hard reality is that if something takes an age to explain, especially with a subject like DMOs where the benefits are not immediately visible to the general public, then it is going to switch policy makers off.

158. **One issue DMOs will need to address is that of geographical overlap.** Whilst I am generally all for competitiveness, I also recognise that intra-region competitiveness in particular can ultimately harm and hinder growth, especially when it overly dilutes a brand and presents confusion from the outside looking in. I lost count of the number of times I was told by people coming from all sorts of perspectives that there are currently 'too many' DMOs within England, 'too many' duplicating and that fundamentally consolidation is needed. I have not recommended that this be engineered by the national Government, with them deciding which DMO covers which area, because I do not think the Government is best placed to know what the right geography is in every part of the country and because local knowledge is so vital. However, I would expect the criteria for any national accreditation scheme to be designed so as to encourage collaboration and join-up. I also hope for a rationalisation

of the landscape to follow, with players across the visitor economy gravitating towards the accredited Tourist Boards and Destination Development Partnerships, and away from the unaccredited.

Recommendation 8: DMOs should seek to diversify their income streams, and should share and learn from examples of best practice. This will enable them to best leverage the core funding I propose and I would expect a commitment to diversification as being an accreditation criterion.

159. **The pandemic has exposed the fragility of the DMO funding landscape, in particular for those relying most heavily on commercial revenue sources like membership fees**. With this in mind, I would recommend that maintaining, growing and diversifying commercial income streams should be a key focus for accredited Tourist Boards. This could give them an extra string to their bow, and support the overall delivery of their strategic vision. If the Government does introduce a core funding approach for Destination Development Partnerships I would expect that this does not erode or detract from the commercial acumen and rigorous evidence praised as a core strength of many DMOs.

160. **The sector is awash with best practice on commercial income generation, and DMOs may consider some of the following as potential areas to look at:**

- **Commercial membership:** moving beyond a transactional relationship to a longer-term (even multi-year) model that builds a sense of 'belonging' among members, encouraging local collaboration and making renewal more likely.
- **Consultancy services:** for example, advising on planning applications and inward investment cases.
- **Training:** developing and running training programmes for businesses and wider stakeholders as necessary.
- **E-commerce and product sales:** using the VisitEngland led TXGB platform, which connects tourism suppliers to domestic and international distributors, to drive online sales of the region's product offering, bringing revenue directly to the organisation.
- **Product offering:** developing and selling consumer experiences (e.g. city walking tourism or running Christmas markets).
- **Acting as a film desk:** Film and TV tourism is a growing market segment for the UK and providing scouting and coordination services for filmmakers could prove a major opportunity area, with substantial dividends going forward.

161. **The new structure could help with commercial income generation.** For example, Destination Development Partnerships could consolidate back office functions across accredited Tourist Boards in their area, freeing staff up to do more proactive activities. Partnerships could also collate and share best practice and organise training for DMO staff. They could also consider providing DMOs with a degree of 'seed funding' from their Government grant to test innovative approaches.

Recommendation 9: DMOs should have a rigorous focus on keeping the skill sets and expertise of their own staff up-to-date, particularly with respect to digital skills, so as to ensure their destination's offer continues to be sustainable and competitive.

162. **The success of any new structure will rely heavily on accredited Tourist Boards and Destination Development Partnerships employing skilled staff, who have the knowledge and tools they need to ensure their destination remains competitive and sustainable.** It's clear that DMO staff are passionate and knowledgeable but I also found concerns with the supply of skilled staff (exacerbated by the pandemic) and an over reliance on particularly brilliant individuals. My hope is that the relevant Destination Development Partnership will allocate a portion of its funding to skills development within the accredited Tourist Boards themselves. In particular, there should be a focus on:

- **Digital skills** – if DMO staff are not equipped to maximise the potential of opportunities presented by emerging technologies such as Augmented and Virtual Reality and 5G then destination competitiveness could suffer. DMOs also need to understand how consumer decision-making and

consumption is shifting online, and should be just as comfortable with Tiktok and Tripadvisor as with creating paperback destination guides.

- **Selling internationally** – Through the Discover England Fund, VisitEngland has worked with DMOs to increase their knowledge and awareness of the international travel trade. Initiatives such as Taking England to the World could be looked at as a model for upskilling small and medium enterprises and the TXGB platform should be utilised to its full extent.
- **Promoting the industry** – DMO staff should also feel comfortable going into schools, colleges and universities to promote the tourism industry as a great sector for realising talent and growing a career, countering misguided preconceptions about the industry as being one just for jobs for the summer. There are some good examples of this already, for example the work undertaken in Liverpool engaging colleges in the city region.

Recommendation 10: DMOs should have more diverse boards that fully represent their communities as well as their businesses and visitors.

163. **Whilst not a dominant theme, I was struck that issues around the diversity and inclusion of DMO boards emerged as an area of concern in the anonymous written consultation exercise**. Simply put – the governance structure of a DMO should reflect the visitor economy it represents. That means reflecting both consumers and businesses and there must be a significant role for the private sector. Different perspectives can always add value, but particularly in tourism where you must look at a destination from the perspective of a visitor. I was struck by comments noting that whilst it's great that DMOs 'live and breathe' their region, this can sometimes blind them to a destination's shortcomings from the perspective of a potential visitor. DMOs should reflect on this recommendation and respond accordingly.

Recommendations for Local Enterprise Partnerships and Local Authorities

164. **My final set of recommendations focus on two groups that will be essential to the success of DMOs going forward, and which were much discussed over the course of the review.** I have focused on Local Enterprise Partnerships and Local Authorities as they quickly emerged as two key cogs in the wheel. As we have seen, for a DMO to be at their best they must be well integrated with bodies and organisations that hold levers associated with their plan for the destination. I do not think it is a coincidence that the DMOs which were regularly cited by contributors to the review as high performing are those working in sync with the Local Enterprise Partnership and the relevant Local Authorities.

Recommendation 11: Local Enterprise Partnerships must realise the value of tourism, ensure the visitor economy is fully integrated into their economic strategies and play their full role as partners in the activities of their local accredited Tourist Board and Destination Development Partnerships. They should recognise that DMO type organisations are best placed to drive growth in regional tourism and they should actively support them.

165. **I am aware that the Government is undertaking its own review of Local Enterprise Partnerships (LEPs).** I am not privy to the findings of that review, however. I am also aware that the Government intends to bring forward a white paper on levelling up and devolution later this year. As such, I have sought to be more general in my recommendations here, on the assumption that things might change.

166. **One finding is crystal clear to me though – wherever the Government ends up on LEPs, they should *not* recommend that they take on the functions of DMOs.** Some respondents advised me to align DMOs and LEP areas, but these were almost always DMOs that were closely integrated with their LEP and aligned geographically. I am not sure that the rest of the country aligns or works in this way. For example, from a consumer perspective it would clearly be ludicrous to build a DMO around 'Enterprise M3'. The foundation stone of any DMO must be what makes sense to the consumer. If that aligns with LEPs, great, if it crosses multiple LEP boundaries then that needs to be worked around. I think artificially fixing DMO boundaries to match LEPs would be a mistake. Similarly fixing LEP boundaries around DMOs would also be a mistake as LEPs cover more than just the visitor economy.

167. **The key point of LEPs is that they need to be more consistently engaged in the visitor economy.** The visitor economy is here to stay, makes a substantial economic contribution and employs millions. To an extent, I think the pandemic experience has woken LEPs up to its value, and there was evidence provided of LEPs that were really well engaged such as in the North East or in London where the LEP contributed £1m to the recent London domestic recovery campaign. However, the overwhelming message was of the visitor economy being underappreciated. For the reasons I have outlined, I think the complexity and fragmentation of the DMO landscape makes it harder for LEPs to engage, but this is not the only problem. Too many in LEPs tend to unfairly dismiss the sector as low productivity and low growth. However, one phrase that emerged during my engagement sticks in my mind – today's visitor is tomorrow's investor. One respondent provided evidence that for their county, 19% of future inward investors started as tourists. They liked what they saw when they came on holiday or visited as a business traveller and decided it was a place for them to build a business.

168. **The question is how to achieve this.** To an extent, I think that if the recommendations for Government are implemented, then this will greatly assist levels of LEP engagement. They will know who to engage with and what they can get, as there will be new Destination Development Partnerships advocating for the visitor economy with clarity. However, I would advise the Government when designing the scheme, and DMOs when bidding for it, to strongly consider the potential for 'cross-pollination' between the LEP and the DMO in order to ensure fully-integrated partnership working, and take the opportunity to eradicate any duplication or overlap within their own structures and committees.

Recommendation 12: Local government – be that a District Council, County Council, Mayoral Combined Authority or any other formulation – must also realise the value of tourism and should strive to play their part in supporting their accredited Tourist Board and Destination Development Partnership. They should accept that for DMOs to be at their best, they need to be public/private/community partnerships, not based solely in a Local Authority but working in close partnership with them. They should also involve their DMO in any policy decision-making affecting the visitor economy.

169. **For a DMO to be at their best, they must work closely with their Local Authority.** The reasoning is simple – the Local Authority holds a number of key policy levers that affect a destination. For example they can run a number of visitor attractions, will look at issues such as local public transport, roads or cleanliness and are important for engaging businesses on issues such as alcohol licensing.

170. **However, I do not think DMOs can be at their best if based entirely within a Local Authority.** As with LEPs, this runs the risk of a DMO that does not have the consumer front and centre and is therefore designed around artificial administrative boundaries rather than boundaries that make sense as a consumer proposition. Furthermore, a Local Authority led organisation may be overly bureaucratic, putting off engagement from the private sector, and becoming subject to changing political winds; there was much criticism of this during the review.

171. **I appreciate how difficult it is for Local Authorities to engage, especially with tourism not a statutory requirement, but I would strongly recommend they do not lose sight of the importance of the visitor economy.** In particular, where they do fund DMOs it is imperative that the funding isn't withdrawn following this review. The activities I am proposing be funded by the central Government are not intended to replace the sort of activities that Local Authorities are best placed to lead. My hope is that, should the recommendations be implemented, Local Authorities will have more clarity about what DMOs are and how they can work in partnership together. They should also have a very useful source of advice and intelligence when it comes to deciding how to use the policy levers they have which have an impact on the visitor economy.

Next Steps

172. **It is now incumbent on the Government to appraise the findings of my review and the recommendations and decide whether or not to proceed with them.**

Annex A: Terms of Reference

1. Purpose

This review aims to examine and assess how Destination Management Organisations (DMOs) across England are funded and structured, and how they perform their roles, in order to establish whether there may be a more efficient and effective model for supporting English tourism at the regional level, and if so what that model may be.

2. Objectives

The review will need to examine the extent to which the current DMO landscape:

- is economically efficient, effective and sustainable (with regard to funding, structure and performance)
- best enables the government to meet its leisure and business tourism policy objectives at a national, regional and local level
- engages within the wider local and regional economic landscape, and the current focus on English devolution and levelling up

Depending on the findings of this examination, the review will then need to make recommendations, to government, the tourism sector or both as appropriate, on:

- whether DMOs might be structured or funded differently, and if so how any proposals might maximise post-COVID-19 recovery and long-term success
- what the role of DMOs should be, bearing in mind existing other local structures such as Local Enterprise Partnerships, Mayoral Combined Authorities, local authorities and other similar local/ regional bodies; and where these might intersect
- how DMOs should best engage with, and be engaged by, VisitEngland, VisitBritain and DCMS, as well as wider government/public bodies where relevant (e.g. Arts Council England; UK Sport)

3. Scope

This independent review will produce a detailed examination of the DMO landscape in England, focussing on a) current funding models; b) organisational structures and c) performance levels (both in respect to before the COVID-19 pandemic ('the pandemic'), and since the start of 2020).

It will then try and establish whether the status quo is the most efficient, economically justifiable way of organising local and regional English tourism sectors, in order to maximise opportunities for supporting policy priorities on a local, regional and national scale, and, where relevant, internationally. These priorities include sector recovery, levelling up, and economic growth, as well as various local and regional priorities that are likely to differ from area to area.

Finally, it will then make recommendations on DMO structures, roles, funding model and engagement with other local and national bodies, based on the findings of the preceding steps. We anticipate that these recommendations could be for both the government at a national, regional, and local level, and the tourism industry.

The review will need to be placed in both a historical and an international context. This includes examining and evaluating the approach taken in England between 1999 and 2010, when regional promotion was carried out by government-funded Regional Development Agencies. It will also need to consider the tourism sector landscape in Scotland, Wales and Northern Ireland, as well as the approaches taken in comparator/competitor destinations globally.

The structure of the national tourism boards, VisitEngland and VisitBritain, will only be in scope of the review where it is relevant to the structures and funding of DMOs.

4. Stakeholder engagement

The review will aim to speak to as many of the estimated 150 DMOs in England as possible in the timeframe given, ensuring consultation with a diverse and representative spread of these organisations in terms of geographical location, size and nature of funding streams.

The reviewer will also need to engage with other local bodies/structures with an overlapping interest in the sector: these are likely to include Local Enterprise Partnerships, Mayoral Combined Authorities, where relevant, regional convention bureaus, and local authorities.

The reviewer will need to speak to a representative sample of tourism stakeholders. This includes commercial business representatives (e.g. hotels, attractions, event venues, hospitality venues etc), and wider organisations with an interest like heritage organisations, the National Parks, local transport bodies. This engagement will help to establish the views of wider stakeholders who have worked closely with DMOs both pre- and during the pandemic – as well as those who have not worked with DMOs before, or who may have started to do so only recently.

Finally, the reviewer will also need to consider the views of key stakeholder bodies in the sector, such as VisitBritain, VisitEngland and member bodies of the Tourism Industry Council, an industry-led board composed of representative organisations from the tourism sector that advises the Minister for Sport and Tourism. It may also consult wider Arm's-Length Bodies and Executive Agencies (e.g. Arts Council England; UK Sport) to understand local funding structures in place across government for other sectors (such as ACE's National Portfolio Organisations).

5. Governance

The review will be led by the current Chair of VisitEngland, Nick de Bois, acting in an independent capacity. Mr de Bois will receive administrative support from a secretariat based in DCMS. Mr de Bois will report directly to the Secretary of State.

In recognition of VisitEngland's independent statutory role to advise the Government on tourism in England, Mr de Bois will be able to draw on the advice, insight and expertise of staff working for VisitEngland during the review as required. However, the review will be considered independent and not the official view of VisitEngland. Wider VisitEngland employees and/or Board members will not be able to access any information that DMOs or other contributors share with the review team – including Mr de Bois in his independent capacity – during the consultation process. VisitEngland's response to the review will be compiled and signed off independently of Mr de Bois, before he formally considers it in his role as Review lead. The final report with recommendations will be delivered to the Minister for Sport and Tourism and the Secretary of State.

Mr de Bois will be able to convene an experienced advisory panel to assist him with his review. He will speak to people, organisations and destinations across England and more widely to gain a fuller picture of the country's diverse tourism industry (we currently envisage that this engagement will take place remotely, though there is the potential to explore a limited number of in-person meetings where deemed appropriate). The final report will draw on existing evidence and that submitted by interested parties during the course of the review to make recommendations to the government and industry.

Any recommendations would need to have regard to existing legislation, DCMS spending commitments and wider government policy, particularly the focus on Levelling Up our regions.

The response to the government recommendations will be led by the DCMS Secretary of State and the Minister for Sport and Tourism.

6. Report and timing

The reviewer will be tasked with conducting their review over spring 2021, before evaluating their findings and submitting a written report, including their recommendations, to the Secretary of State by summer 2021. The final report will be published on gov.uk and laid before both Houses. The government will respond to the review's recommendations in due course, with the response led by the Secretary of State and the Minister for Sport and Tourism.

7. Context

7.1 DMOs

Destination Management Organisations (DMOs) are a common feature of local and regional tourism landscapes worldwide, and play an important role in the English tourism ecosystem. There are an estimated 150 DMOs in England, although these vary substantially in terms of activity, size, geographical area covered, funding models, structure and the degree to which they work with both the central government and the British Tourist Authority (BTA, trading as VisitBritain and VisitEngland).

DMOs are not the only local/regional organisations involved in place-based tourism policy and promotion – Local Enterprise Partnerships (LEPs) and local authorities can also play a role, as can Business Improvement Districts. It is not a statutory requirement for local authorities to fund tourism.

It has been suggested that the sheer variety and number of DMOs can make local tourism coordination and collaboration at a strategic level, in support of government policy objectives, more challenging, leading to duplication of efforts or, worse, a lack thereof, with subsequent impacts on the productivity and competitiveness of country's tourism sector, even pre-COVID-19.

7.2 COVID-19

The government recognises that the tourism sector has been among the worst-hit industries by COVID-19 and that DMOs have been particularly hard hit, especially those reliant on commercial income. Many DMOs have been at risk of closure at a time when their business support role has become more important. At the same time, the government is aware that DMOs will have an important role to play in supporting the English tourism sector recover in the medium and long term, in line with government priorities around economic recovery and Levelling Up.

The pandemic has thrown issues with the current DMO landscape into sharper focus. So far, VisitEngland have made £2.3m available to support the survival of commercially reliant DMOs until March 2021, so that they remain viable to support government work on sector recovery. However, the government recognises that this is a short-term solution. The government also recognises that some DMOs have been forced to fold, while others have had to take cost-saving measures.

At the same time, the pandemic has highlighted strong examples of standardisation, collaboration and more agile working among DMOs.

7.3 Devolution in England

The government has set out a clear commitment to level up all areas of the country, and wants to devolve and decentralise to give more power to local communities. It intends to bring forward the Devolution and Local Recovery White Paper in due course, which will cover how the UK government will partner with places across the UK to build a sustainable economic recovery and set out our plans for future devolution arrangements. This work, combined with the fragility of the current DMO landscape, suggests now is a good opportunity to carry out a full-scale examination and assessment of the English tourism sector, to understand how it works currently and whether there is potential for it to work differently, in order to help strengthen the domestic sector through short and medium-term COVID-19 impacts, so that it can play a role in longer-term recovery.

Annex B: Methodology

Below I have provided further detail on the methodology I used to gather evidence for the review. In particular, I have provided further detail on the following:

- The one to one virtual meetings I held with stakeholders in March and April 2021.
- The online survey for DMOs, that ran between 24th March and 16th April 2021.
- The written consultation exercise, open to anyone, that ran between the 18th March and 4th May 2021.
- The nine in-person roundtable discussions I held in June 2021.

One-to-one virtual meetings in March and April 2021

I have provided a list below of who I met during my initial engagement. There was no set script or questions underpinning these meetings. Their primary purpose was to begin exploring the themes in the terms of reference, and to build my understanding of the DMO landscape and both its strengths and weaknesses. Common topics included what does and does not work well, why do we need DMOs, funding and fragmentation, the pandemic and examples of best practice – both within England and internationally.

Politicians

Andy Burnham – Mayor of Greater Manchester Combined Authority
John Penrose MP – former Tourism Minister
Tracey Crouch MP – former Tourism Minister

DMOs

Bury St Edmunds and Beyond
Cumbria Tourism
Experience Oxfordshire
Liverpool City Region Visitor Economy Board
London and Partners
Marketing Manchester
National Coastal Tourism Academy
Newcastle Gateshead Initiative
Visit Bristol/Visit Bath
Visit Cornwall
Visit East of England
Visit Herefordshire
Visit Isle of Wight
Visit Kent
Visit Lincoln
Welcome to Yorkshire
West Midlands Growth Company

Arms Length Bodies

Arts Council England
Historic England
VisitBritain and VisitEngland

Other

Association of Leading Visitor Attractions
Davies Tanner
Former Head of Tourism Policy at DCMS
Holiday Homes Association
LEP Network
Local Government Association
Mosaic Outdoors
Peak District, Northumberland and Exmoor National Parks
Tourism Alliance
Tourism Management Institute
Tourism for All

Online survey of DMOs, running between 24th March and 16th April 2021

The online survey was issued to 178 organisations taken from a list of English DMOs provided by VisitEngland. The survey was anonymous and asked a series of questions about size, structure, staffing, governance, membership, funding position, income streams and sector engagement.

In total I received 168 responses, of which 98 were completed and 5 were flagged as spam. Not every respondent answered every question and the average progress completed across responses was 75%.

Whilst the sample captured may not include each and every DMO in England, the total number of complete responses can be taken to represent a fairly accurate picture of the current landscape and I have felt comfortable in drawing conclusions about the landscape based on the survey.

Written consultation, running between 18th March and 4th May 2021

I wanted to make sure everyone had a chance to contribute their views as I knew that in the tight timeline available I would not be able to meet as many people as I would otherwise have wanted to. That is why I ran an online public consultation inviting responses from anyone. The consultation questions, along with the privacy notice associated with the data gathered can be found on gov.uk here: https://www.gov.uk/government/consultations/independent-review-of-destination-management-organisations-dmos-consultation

The consultation received 289 non-duplicative responses via the online portal, 18 via the DMO Review mailbox that I set up at the start of the process and 38 via other routes. In total there were therefore 345 submitted responses. Of these, 76 came from DMOs, 230 came from 'other organisations' such as tourism businesses, Local Enterprise Partnerships, Local Authorities or academics, and 39 came from members of the public.

My initial intention was to undertake analysis of the responses myself, in conjunction with the DCMS secretariat supporting me on the review, but the volume of responses received and the detail provided proved too substantial. DCMS therefore issued a tender inviting bidders to come forward to undertake the analysis. The contract was awarded to Llewellyn McLaren Consulting and they did a first rate job in turning around, in short order, a detailed report on the findings. I have drawn on it heavily in this document, and also deployed quotes submitted as part of the consultation.

Nine in-person sector roundtables in June 2021

The purpose of the roundtables were twofold – first to examine the key themes that had emerged from the initial stages of consultation and second to begin considering the policy implications for the Government. I wanted to make sure I was on the right track and also start thinking about solutions. Attendees for the roundtables were selected to ensure a broad spread of representatives – including DMOs, Local Enterprise Partnerships, Local Authorities, the private sector and academics. I worked with the Challenge Panel and DCMS Secretariat to develop a list of invitees.

Prior to the roundtables a short paper was issued to attendees introducing the key themes I had identified by that point, so as to serve as the basis of the discussion. There were nine themes in total and at each roundtable I spent half the session looking at two of the themes in detail. The themes were:

1. The huge variance in the size, model, and focus of DMOs across England means they are not as economically efficient, effective and sustainable as they could be.
2. DMOs do much more than just marketing. What should DMOs do, and how should this be supported?
3. Funding security is the number one problem identified by DMOs – agree?
4. The role of DMOs, and the importance of the visitor economy more generally, is poorly understood, leaving DMOs sidelined in decision-making.
5. Regional tourism is weaker because it has no top-down structure set nationally.
6. Why aren't Government priorities for tourism higher up DMOs' agendas?
7. DMOs are insufficiently integrated with wider local and regional economic structures to enable a fully coordinated approach to regional visitor economies.
8. How should DMOs be held to account?
9. Do major events (conferences, cultural/sporting events, filming etc) offer a missed opportunity for DMOs?

I have also listed below who the attendees were at each roundtable and its location.

East of England (Cambridge)

– Cambridge and Peterborough Combined Authority LEP
– Discover Newmarket
– Ely Cathedral
– Greater Yarmouth Tourism BID
– Knebworth House
– Shorthouse Russell Agency
– The Graduate Hotel
– Thameslink
– Visit Cambridge
– Visit East of England
– Visit Suffolk

East Midlands (Bakewell)

– Chatsworth Park
– D2N2 LEP
– Derby QUAD
– Derbyshire County Council
– East Lindsey District Council
– East Midlands Chamber
– Heights of Abraham
– Leicester and Leicestershire Place Marketing Organisation
– Marketing Peak District and Derbyshire
– National Forest Company
– Nottingham Castle Trust
– The Stay Company
– University of Lincoln
– Wicksteed Park

London (Greenwich)

– Greenwich Foundation for the Old Royal Naval College
– London and Partners
– Night Czar for the Mayor of London
– Royal Museums Greenwich
– South Bank Employers Group
– Visit Greenwich
– University of Greenwich

North East (Newcastle)

– Alnwick Gardens
– Arts Council England
– ASM Global
– Beamish Museum
– Newcastle Gateshead Initiative
– North East LEP
– North of Tyne Mayoral Combined Authority
– Northumbrian Water
– Northumbria University
– Sage Gateshead
– Visit County Durham
– Visit Northumberland

North West (Ribble Valley)

– ACC Liverpool
– Browsholme Hall
– Cumbria Tourism
– Jodrell Bank Discovery Centre
– Lake District National Park
– Liverpool City Region Visitor Economy Board
– Liverpool John Lennon Airport
– Marketing Cheshire
– Marketing Lancashire
– Marketing Manchester

South East (Portsmouth)

– Brighton Dome
– Coast2Capital LEP
– Experience Oxfordshire
– Gosport DMO
– Great Sussex Way
– Paultons Park
– The Hotwalls Studios
– Tourism South East
– Visit Hampshire
– Visit Portsmouth
– West Sussex+ DMO

South West (Tiverton)

– Brend Hotels
– Cornwall and Isles of Scilly LEP
– Great Western Railway
– National Trust
– Professional Association of Self-Caterers
– SS Great Britain
– South West Tourism Alliance
– West Dorset Leisure Holidays
– West of England Combined Authority
– Visit Cornwall
– Visit Exmoor
– Visit Devon
– Visit Gloucestershire
– Visit West
– Visit Wiltshire/Great West Way

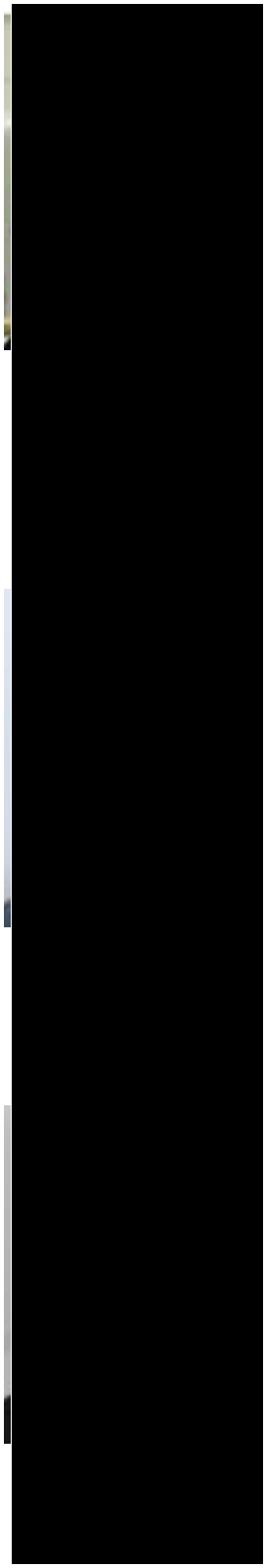
West Midlands (Shrewsbury)

– Birmingham Airport
– Black Country Living Museum
– Canal and River Trust
– Culture Central
– Eat, Sleep, Live Herefordshire
– Ironbridge Museum Trust
– Marches LEP
– National Exhibition Centre
– Shakespeare's England
– Severn Valley Railway
– Visit Shropshire
– West Midlands Growth Company

Yorkshire (Hull)

– Discover Harrogate
– Castle Howard
– Hull City Council
– Hull and East Yorkshire LEP
– Make it York
– The Deep
– Visit Hull and East Yorkshire
– William's Den
– Wykeland

Annex C: Challenge Panel Members



David Curtis-Brignell MBE FTS

David started his career in local government working in British resorts. He then spent nine years at the English Tourist Board working alongside the Regional Tourist Board network and travel trade before moving into the commercial world, holding senior positions in global international hotel companies, travel and tour operators.

In 2015, he was invited by Visit Kent to set up the new DMO Visit Herts. He became Deputy CEO for the GoToPlaces group, working in Kent and Hertfordshire developing new projects, including "The Big Weekend".

David served two terms as Chairman of The Tourism Society, co-founding British Tourism Week and then chairing VisitEngland's English Tourism Week for ten years. In October 2020 he established Tourism Reimagined as a platform to support business recovery and is a frequent contributor to publications and an industry speaker. He was awarded an MBE for services to tourism in the 2020 Queen's Birthday Honours.

Michael Hirst OBE

Michael is Chairman of the UK government's Events Industry Board, established to grow the number of international business events held in the UK, and immediate past Chair and Executive Committee member of the Business Visits & Events Partnership, representing Britain's business and cultural events' industry. Michael serves on the Tourism Industry Council and is a director of the Tourism Alliance, the body that brings together all the major tourism organisations in the United Kingdom.

Michael was appointed an OBE in 2004 for his services to tourism in Britain and was awarded the 2013 Joint Meetings Industry Council Unity Award, recognising individuals who have made a significant contribution to the advancement of the international Meetings Industry. He was awarded the 2008 IHIF Lifetime Achievement Award for his distinguished career in hospitality, leisure and tourism.

John Hoy FRICS

John spent 13 years as the Agent & General Manager for the Knebworth Estate before leaving to join The Tussaud's Group – initially at Warwick Castle as Head of Operations and then General Manager of Madame Tussaud's London.

In 2003, he was appointed the first Chief Executive of Blenheim Palace, where he drove significant change until he left at the end of 2016. John now advises a number of heritage and leisure clients, including spending two years at Castle Howard as Chief Executive.

John sat on the VisitEngland Advisory Board from 2011 to 2019, and is currently the chair of Silverstone Heritage Limited and of the Culture and Visitor Economy Sub-Group of the Oxfordshire LEP.

Kate Kennally

Kate joined Cornwall Council in January 2016 after a decade as Chief Executive at Barnet Council. With a background in people services, she is passionate about improving the life chances of the people of Cornwall through economic growth and through empowering communities to get involved in the delivery of public services.

Kate has accelerated the transformation and improvement of Cornwall's Council services, with an emphasis on adult social care and delivering the conditions for inclusive growth beyond Brexit. This has resulted in a reconfiguration of roles and responsibilities within Cornwall, with public amenities devolved to local communities and the Council gaining new 'strategic' powers from the Government to deliver the infrastructure, homes, skills and jobs to create a more prosperous and sustainable Cornwall.

Frank Rogers

Frank was appointed Chief Executive of the Liverpool City Region Combined Authority in November 2018, having previously taken up the position of Interim Head of Paid Service in 2017.

Frank oversees the Combined Authority's work across a range of key policy areas including transport, strategic investment, housing and employment and skills.

In 2015, Frank was appointed as Merseytravel's Interim Chief Executive being confirmed in the permanent dual role of Chief Executive and Director General two years later, before taking up his current dual role leading the Combined Authority and Merseytravel. He joined Merseytravel in 2006, as General Manager.

Sarah Stewart OBE DL

Recently retired following a wide-ranging career in marketing and business development, Sarah was Chief Executive of NewcastleGateshead Initiative 2010-2019, a successful public/private partnership operating as a DMO for leisure tourism and business events and as an inward investment agency. During this time, NGI bid for and delivered major sporting and cultural events, including the Great Exhibition of the North (2018).

Her early career was with Procter & Gamble, Price Waterhouse and Sage Group plc and was followed by a successful freelance career. Former non-executive roles include Deputy Chair of Port of Tyne and International Centre for Life. Member of the VisitEngland Advisory Board (2011-2019). Sarah was awarded an OBE for services to the North East economy in 2016 and is now Chair of Gateshead College.

Nigel Wilkinson

Nigel has been Managing Director of Windermere Lake Cruises Limited since 2004. He is also Managing Director of Winander Leisure Limited, and Director of Winander Group Holdings Limited, Lakeland Motor Museum Limited and Rushbond plc.

Windermere Lake Cruises Limited carried over 1.6 million passengers in 2019, making it one of the most popular paid visitor attractions in England, according to the most recently published Visit England Visitor Attractions Survey. Nigel joined the Board of Cumbria Local Enterprise Partnership in 2017 and chairs its Visitor Economy Sector Panel and its Finance, Audit and Resources Committee. From 2007 to 2017, he was a director of Cumbria Tourism.

[redacted]

Kate Willard OBE

Kate is the Thames Estuary Envoy and chairs the Thames Estuary Growth Board. In addition, she is senior advisor to Esken and an independent consultant working on a diverse portfolio of infrastructure and growth projects. With a background in culture and creativity, Kate has lived and worked in Hungary, France and Belgium, as an independent regeneration expert with the European Commission on major transnational projects in employment, social cohesion and regional development.

Whilst living and working in Hungary, Kate also established the first UK-Hungarian cultural partnership trust, Brouhaha Magyarország and was CEO of the UK's first rural regeneration company (Rural Regeneration Cumbria). Kate is a Churchill Fellow and Fellow of the Royal Society of Arts (FRSA).

Baroness Laura Wyld

Laura Wyld's career has spanned business, public life and the voluntary sector.

Appointed as a non-executive board member of DCMS in 2020, she is also currently a non-executive board member at Ofsted and a freelance communications and strategy consultant.

She is a Member of the House of Lords and sits on the Public Services Committee, and was also a member of the Regenerating Seaside Towns Select Committee.

Annex D: Acknowledgements

A large number of people have made this review possible, enabling me to get it done in what was an extremely challenging timeframe.

First of all I want to extend my thanks to the small team of DCMS officials which has supported me throughout the review. They have provided the exemplary support, expertise and passion to help deliver this report that I have had the pleasure of witnessing in many other professionals across the tourism sector during this review. To have completed this task in such a tight time scale and under the conditions imposed during the pandemic I am very grateful to the personal efforts of David Martin, Xanthe Dennis and Jamie Haworth.

I also want to thank Anna Adrien, my Executive Assistant in my capacity as Chair of the VisitEngland Advisory Board, who has organised my diary and stepped in as emergency note taker, and also Edwin Poon at DCMS, who undertook the detailed analytical work on the quantitative data I gathered.

Second, I would like to thank those members of the Challenge Panel which I set up to help me make sense of all the evidence coming in. They have been a great help in acting as a sounding board throughout the process, informing opinion, probing and testing my recommendations, and participating in the series of roundtables across the country.

Third, I want to thank those DMOs and attractions which took the time to host me in-person, and to facilitate the series of regional roundtables I held in June. Organising large meetings is never easy, but doing so in a pandemic is even more difficult. It was great to be able to meet people in person again, and I am grateful to all the venues for facilitating that in a safe way.

Fourth, I want to thank Llewellyn McLaren Consulting, who DCMS commissioned to provide me with an analysis of the qualitative data I gathered through the written consultation exercise. Their work was first-rate, and done at breakneck pace.

Fifth, I want to thank Lord Mendoza for taking the time to meet me at the start, and near the end, of the process to discuss his experience of running an independent review.

Lastly, I want to thank all those who took the time to contribute, be that in one-to-one meetings with me, as respondents to the various consultation exercises I undertook or as attendees at the regional roundtables. The response from the sector to the review has been enthusiastic, engaged and substantive.

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August 2021

APPENDIX E – Sizewell C Tourism Fund Visitor Perceptions Research

Visitor Perceptions Research

Sizewell C
Tourism Fund

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Introduction to the Project

East Suffolk Council have conducted research into how current and potential visitors to the region feel about holidays and trips to the area and the impact of the Sizewell C development.

This report presents the results of in-depth research into current and potential visitor attitudes. It also presents segmentation of the UK public based on this research. The key research stages included:

- An online, nationally representative, survey of 12,564 members of the UK population
- Data analysis to identify seven distinct segments within the data
- One-to-one depth interviews with members of the public representing each of these seven segments

In this report we outline the key findings from this research and introduce the seven East Suffolk visitor segments.

Methodology

The quantitative survey was in field from the 26th of June 2025 to the 23rd of July 2025. The questionnaire included an initial set of demographic questions that were asked of the full nationally representative sample – including both unprompted and prompted awareness questions relating to East Suffolk.

This was to ensure that the total sample was representative of the entire UK population and in order to build an accurate picture of knowledge and engagement with East Suffolk.

A further set of East Suffolk visitation questions, including on past visits over the last 18 months and planned or considered future visits, allowed that sample to be broken into a non-visitor group (which were then screened out of the full survey) and a group of 4,000 past or future East Suffolk visitors.

This East Suffolk Group then engaged with a range of questions including:

- More detailed East Suffolk awareness questioning
- Further demographic and financial questions
- Questions on past/future East Suffolk visitation behaviour
- Sizewell C awareness and perceptions
- Broader tourism attitudes and behaviour
- Media engagement
- Wider social and personal attitudes

Through this detailed survey of the British public, we were able to break the past and future visitor group of 4,000 members of the public into seven distinct and revealing segments – details of which are available across the following pages of this report.

To build up a richer picture of these groups we recruited members of the public who matched archetypes of the segments to qualitative research sessions.

These sessions, held as one-to-one interviews, discussed their holiday planning behaviour generally, knowledge of and awareness of East Suffolk, recent visits to the region and/or future trips. 33 interviews were completed in total, all in September 2025.

Full details of the survey content are available as an appendix to this report.

Qualitative Interviews

The qualitative stage of this research involved a total of 33 interviews across these seven segments – reflecting the different sizes of the segments within our East Suffolk past or future visitor group.

These numbers were as follows:

- East Suffolk Superfans: Eight Interviews
- One Timers: Six Interviews
- Local Connections: One Interview
- Hotel Stays: Seven Interviews
- Self-Caterers: Seven Interviews
- Relaxation Seekers: Two Interviews
- Casual Considerers: Two Interviews

Understanding the Impact of Sizewell C

A significant motivation behind the research and analysis that underpins this report is understanding the current and potential impact of the Sizewell C development on visitation to East Suffolk.

With that aspect of the project in mind, this research sought to provide both unprompted and prompted opportunities for participants, in both the quantitative and qualitative stages of the research, to mention and discuss the potential impacts of Sizewell C on their visitation behaviour.

All participants who did not fall into our East Suffolk Group – i.e. those with no past visits since January 2024 and no plans or considerations of a future visit within the next two years – were asked an open question as to why they did not have plans to visit within that two-year timeframe.

Of those 8,564 individuals, only a single respondent cited the Sizewell C development as a reason for them not visiting.

Within the research the audience we wanted to hear most from were the East Suffolk Group of past and future visitors and with this in mind a further set of prompted and unprompted questions were asked. These included:

- An open and unprompted question relating to any news stories they had heard recently relating to East Suffolk
- A prompted question relating to their degree of familiarity with the Sizewell C development as well as, if applicable, how they had first become aware of the development
- A set of questions assessing participants attitudes to nuclear power in the UK more broadly
- A multi-select agree/disagree question relating to statements concerning the Sizewell C development
- A further multi-select question in which participants were invited to highlight any concerns they had regarding the development

This set of questions was designed explicitly to further our understanding of public perceptions of the development as well as its possible impact on visitation.

Further details on the questions as well as segment-by-segment responses are available in the questionnaire appendix, the full quantitative reporting deck, and throughout the remainder of the report, but a topline overview of responses follows here.

- Just over one-in-five (21%) of our East Suffolk Group had heard a recent news story relating to East Suffolk. Of that sub-group, just 16% had heard a news story relating to Sizewell C – equating to just over 3% of our entire East Suffolk Group sample.
- More broadly, however, recognition of Sizewell C was relatively high across the sample. Only 24% had never heard of the Sizewell C development while half the sample responded that they knew a little, a fair amount, or a lot about the development.
- Attitudes to nuclear power more broadly were broadly positive. Just under half (48%) of the East Suffolk Group were somewhat or very in favour of nuclear power – compared to 15% who were somewhat or very against it. Over half (51%) believed we should be building more nuclear power stations – compared to the 24% who opposed doing so.
- Wider questions relating to the development showed more mixed, though still largely positive, responses. Just over half (51%) the East Suffolk Group sample agreed they would be interested in seeing some of the construction whilst 58% agreed that they would be just as likely to visit the area during construction as they would otherwise.
- Yet some indication of possible changes to visitation behaviour did emerge – 39% of the East Suffolk Group said they were more likely to visit areas of the UK other than East Suffolk during construction though they did not rule out future visitation entirely.
- Concerns over the impact of construction on the local area did emerge – with traffic (56%), the impact on the local character of the region (56%), and the impact on wildlife (67%), some of the most selected options.

Understanding the Segmentation

Once our 4,000 individual sample of past and potential future visitors to East Suffolk has been established from within the full nationally representative sample of 12,564 members of the public, we then sought to segment this group to provide a more nuanced and useful understanding of how this broader group should be understood.

The structure of the survey naturally breaks the sample into three groups – those who've visited recently, those who haven't visited recently but plan to do so, and those that haven't visited recently but are open to visiting in the future. These formed the basis for our three East Suffolk groupings:

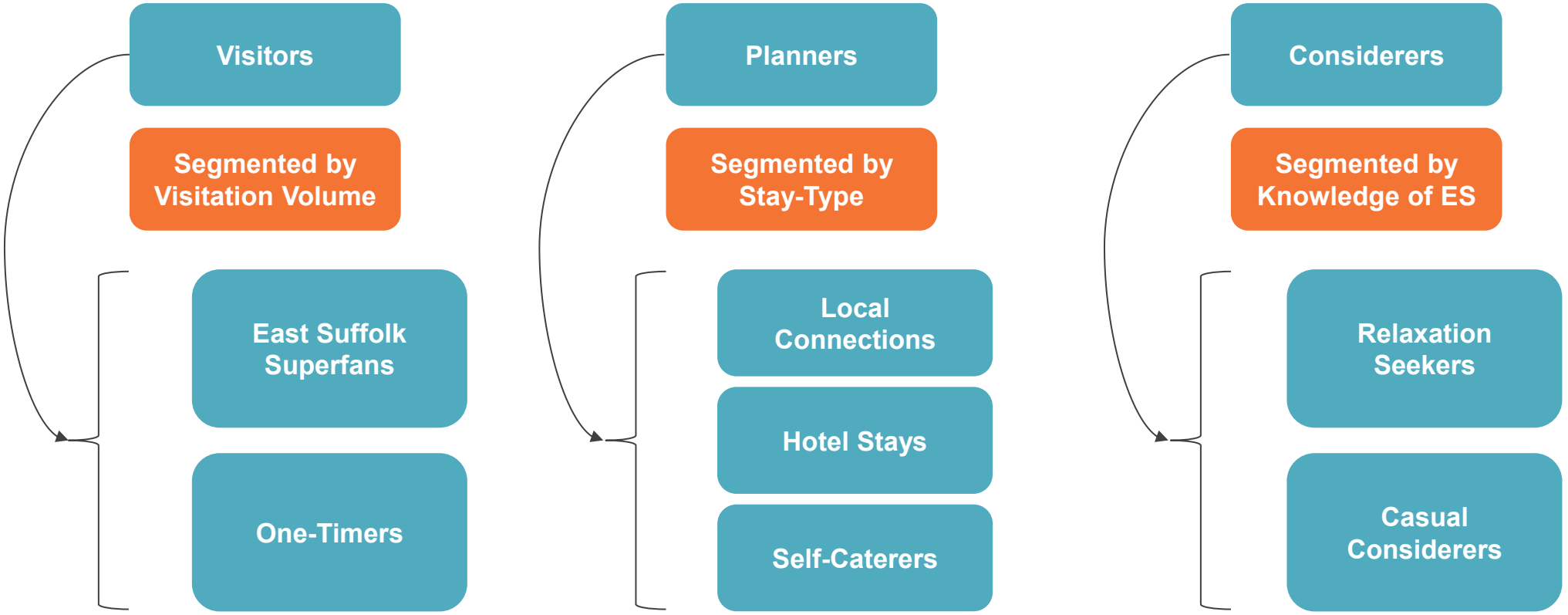
- **Visitors** – those who have visited East Suffolk since January 2024
- **Planners** – those with plans to visit East Suffolk within the next two years
- **Considerers** – those who do not have plans but would consider visiting East Suffolk within the next two years.

By breaking down each of these three groups into their own segments we're able to create a more nuanced, but still understandable, segmentation.

With these three groups having their own nuanced relationship with East Suffolk this segmentation took on a slightly different form within each of the three overarching groupings:

- **Visitors** – segmented by how often they had visited and whether they had plans to visit again within the next two years
- **Planners** – segmented by their reason for planned visit and by the accommodation type they planned to stay in
- **Considerers** – segmented by their knowledge of East Suffolk

This approach to the segmentation allowed us to break the 4,000 individual East Suffolk Group into seven non-equal segments:



These are explained in more detail on the following page.

Visitor Segments

East Suffolk Superfans: Have visited in the last 18 months and plan to visit again – and have often visited multiple times. Represent 7% of the total UK population and 22% of our East Suffolk Group.

One Timers: Visited in last 18 months but have no specific plans to visit again. Represent 2% of the UK population and 6% of our East Suffolk Group.

Planner Segments

Local Connections: Have plans to visit in order to visit family/friends or to stay at their own second properties. Represent 1% of the UK population and 3% of our East Suffolk Group.

Hotel Stays: Plans for visitation are based around catered stays or hospitality venues (e.g. hotels). Represent 7% of the UK population and 22% of our East Suffolk Group.

Self-Caterers: Plans for visitation are at self-catered locations – e.g. Airbnb or camping. Represent 6% of the UK population and 19% of our East Suffolk Group.

Considerer Segments

Relaxation Seekers: Have reasonable knowledge of East Suffolk and its towns/villages – associate it with peacefulness, nature, and beauty. Represent 5% of the UK population and 17% of our East Suffolk Group.

Casual Considerers: Lower knowledge of East Suffolk and fewer associations with peacefulness or scenery. Very low recall of towns/villages. Represent 4% of the UK population and 12% of our East Suffolk Group.

Key Findings

Awareness of East Suffolk

Across the entire nationally representative sample awareness of East Suffolk was relatively strong (84% had heard of the region) but specific knowledge was extremely low (5% knew the area well). This naturally rose amongst our East Suffolk group – 28% knew the area well whilst a further 66% had heard of the region.

East Suffolk Associations

Amongst the East Suffolk group, the region was regularly associated with peacefulness and natural beauty – as well as a region with a strong links to coastal experiences and cultural heritage.

Recent or Future Visit Behaviour

Visitation behaviour was inherently different between our segments due to their differing relationships with the region but a pattern of past and future visitation around key locations (e.g. Lowestoft and Southwold) and in summer months was most common.

Broader Holiday Preferences

UK holidays were popular across our entire East Suffolk group sample – accounting for a significant proportion of total holiday volume. Holiday spending was diverse and reflected income patterns – whilst the use of social media as a research method for holidays was present across all segments.

A more detailed overview of the seven segments and their responses across the full range of topic areas included in the survey can be found in the following table:

	East Suffolk Superfans	One Timers	Local Connections	Hotel Stays	Self-Caterers	Relaxation Seekers	Casual Considerers
Demographics	Younger, trending male, and living close to Suffolk	Trend slightly younger than average – but ethnicity and gender in line with average	Strong young (18-34) representation – otherwise align with ES Group avg.	Largely representative age break – trend male	Trends slightly older, but only marginally, and over-index female compared to ES group	Trend the oldest of all segments and lean white and female	Diverse age range – though index slightly older and female
East Suffolk Awareness	Highest recognition of East Suffolk and awareness of news	East Suffolk recognition high but below ESS segment	Recognition and awareness of ES group trends highest of non-Planner segments	Middling to average ES awareness and recognition	Awareness and recognition is slightly lower than ES group average	East Suffolk awareness and recognition lower than non-Considerer segments	Lowest ES awareness and recognition across all segments
East Suffolk Engagement	High levels of past visitation and future planned visits – diverse visitation behaviour	Less regular visitation and no concrete future plans for visits – less likely to visit w/ children	Planned visits are to see family or stay at second home – reflected in higher rate of day visits	Mid-length visits (2-5 days) most common – in smaller groups and at non-catered accom.	Entirely plan to stay in self-catered accom. – but diverse choices within that	Particular knowledge of ES as peaceful and beautiful – diverse range of accom.	Lack of prior knowledge of ES and no link to ES as peaceful or natural
SZC Perceptions	High awareness of SZC – relatively high levels of support and concern	Marginally above average SZC awareness – lower concerns	Relatively high rates of SZC awareness and concern/impacted behaviour	Mixed SZC awareness and perceptions – and average impacts on behaviour	Somewhat more nuclear-hesitant – but low SZC awareness driving lower concern	Weak familiarity with SZC – driving low support and concern, but interest in learning more	Very low SZC awareness – driving low levels of support, concern, or behaviour change
Holiday Preferences	Regular holiday trips and higher than average spending	High rates of holidays but lower spending behaviour	Higher holiday spending than avg. with family visitation key driver	Trend towards mid-to-high spending on holidays – with culture/leisure key	Lower than average holiday spending – scenery strongest driver	Lower holiday engagement and spending - scenery key driver	Low holiday engagement and spending
Wider Values	Higher sustainability concern and leisure focus	Lower, but still significant, sustainability concern	Strong sustainability focus amongst segment	Strong sustainability and culture focus	Sustainability and leisure strong focuses	Culture strong driver of values	Lower engagement with sustainability or leisure than ES Group
Media	High media engagement	Generally average engagement with wide range of media	Higher engagement with written media	Higher than average media engagement	Average media engagement – slightly under-indexing on social media	Strong TV engagement but weaker media engagement elsewhere	Below average media engagement
Summary	**An engaged, younger segment with close ties to ES**	**Younger leaning but less engaged – but with positive ES views**	**Strong connections with ES – but often not due to location itself**	**Focused on more catered, cultural, stays**	**Self-sufficient and slightly lower spending**	**The oldest segment with strong perceptions of ES beauty**	**Low ES engagement and awareness drive weak ties to region**

Understanding the Segments: East Suffolk Superfans



"[A] perfect, quiet place... My mum loves to visit [with me]"
ESS, 25-34, Male, South East England

Young families	Typically families with young kids living within a few hours drive of East Suffolk – visit for short breaks and day trips regularly
Emotional connection	This group have an emotional connection to the area – often because of their own childhood visits or because it's the destination they bring their kids to
Outdoorsy	Describe themselves as 'outdoorsy' and prefer trips and leisure in the countryside – parks, gardens, walks, cycling. East Suffolk providers this (and beaches!)
SZC Neutral	Generally positive/neutral views on Sizewell C development – but notable concern over immediate impacts (e.g. transport disruption)
Explorers vs. base camp	Some are keen to explore the area widely, but many repeat trips and locations because 'knowing' the area provides a simple and easy break

East Suffolk Superfans at a Glance

East Suffolk Superfans are significantly more likely than other segments to be aged 25-34 (33%) – whilst over half this segment is aged between 25-44.

This segment also significantly over-indexes male (57%) – whilst Black British representation is also higher than both the national and East Suffolk Group averages.

East Suffolk Superfans also trend higher income (16% with household income above £83,000) – and generally have higher savings.

Location wise – they are notable amongst all the segment for generally living relatively close to East Suffolk, through London and other South-East regions



East Suffolk Superfans: In Depth

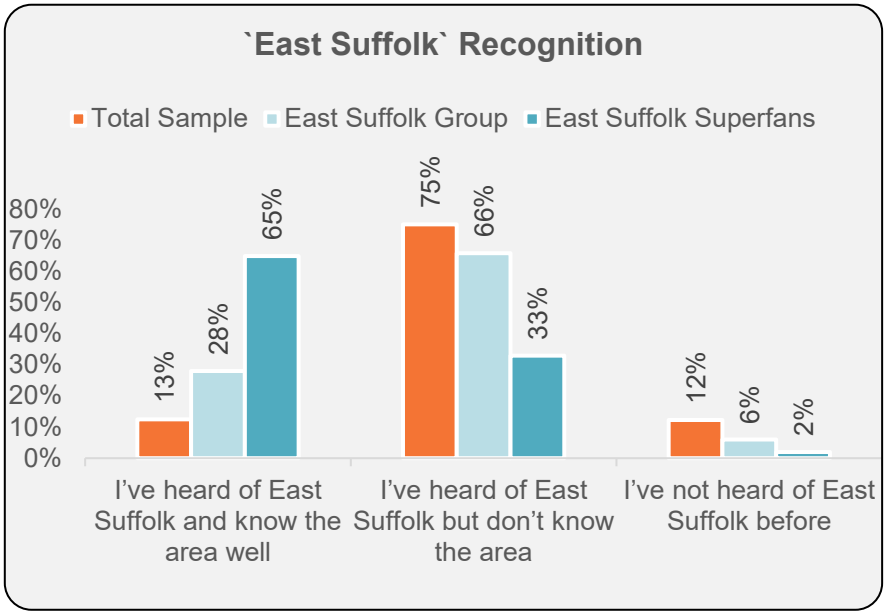
Leisure oriented and local – East Suffolk is their destination for trips to the coast. They take lots of holidays (66% taking three or more holidays per year).

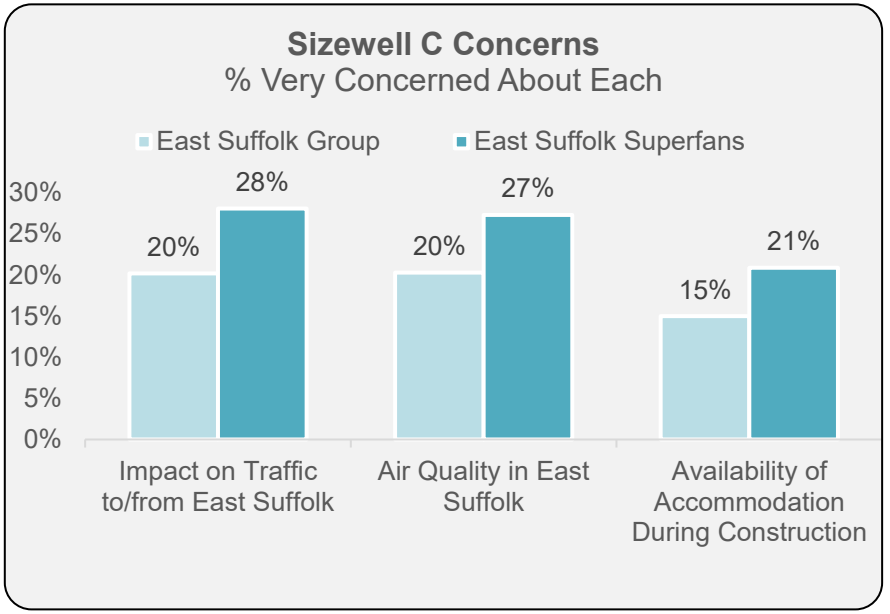
Little promotion likely needed to inform them about East Suffolk with awareness of the region high (65% say they know the area well). But competition for time and money means it's important to stay top of mind – and the more they hear about East Suffolk the better.

More likely to have children and to travel with them than other segments (61% travelled to East Suffolk most recently with at least one child).

Culture, history and heritage less central to their interests
Need some reassurance about Sizewell C – the segment is mostly pro-nuclear but worried about the impact on traffic and air quality.

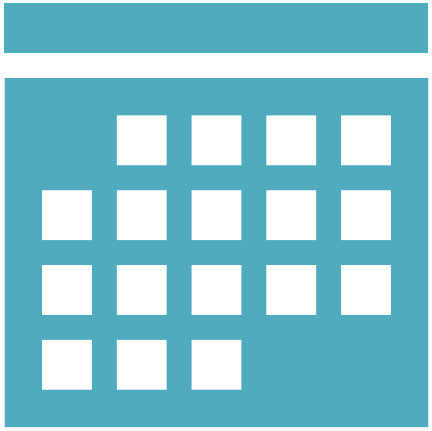
Easy to reach – social media / newspapers / TV all strongly represented in media-engagement analysis





Sizewell C Tourism Fund

Understanding the Segments: One Timers



"In the UK, we don't really plan to see anything specific, and I think there are only a very, very few exceptions to that… it's more of a change of pace"
OT, 35-44, Male, London

Children and animals	Broadly similar in family structure to East Suffolk Superfans – often with both children and dogs – though some smaller groups did feature
Weaker memories	Limited knowledge of East Suffolk, other than where they'd been on holiday, and with less emotional attachment
One holiday in many	Positive about their experience but mostly viewed as one of many holidays, rather than stand-out experience
SZC: Mixed Interest	Mixed feeling about Sizewell C/ Nuclear power but does not negatively impact their views of ES – some might even return for a tour
Return of the One Timer?	Group split between those who wouldn't rule out a return but would prefer to visit somewhere new, and those who view ES as a potential recurring holiday destination

One Timers at a Glance

The One Timers segment trends slightly younger (26% at ages 25-34) when compared to both the wider population and the East Suffolk Group.

On both gender (51% male) and ethnicity, the One Timers segment trends in line with the wider East Suffolk Group.

They do, however, trend slightly higher income (25% with household income higher than £61,000) than the average – but not to the same extent as the East Suffolk Superfans. Similarly, they trend relatively local – but again not to the same extent as the Superfans.



One Timers: In Depth

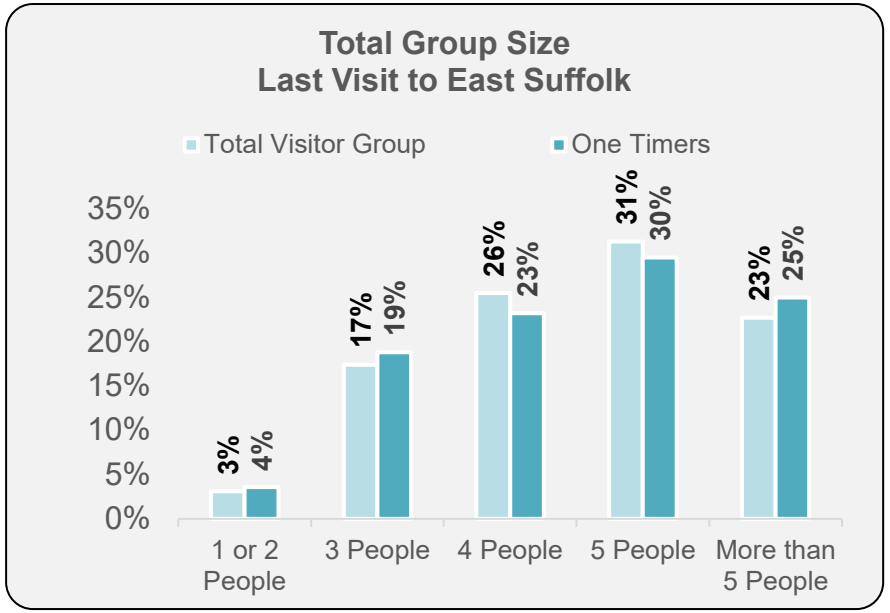
Profile similar to East Suffolk Superfans – younger and relatively local – but to a lesser degree.

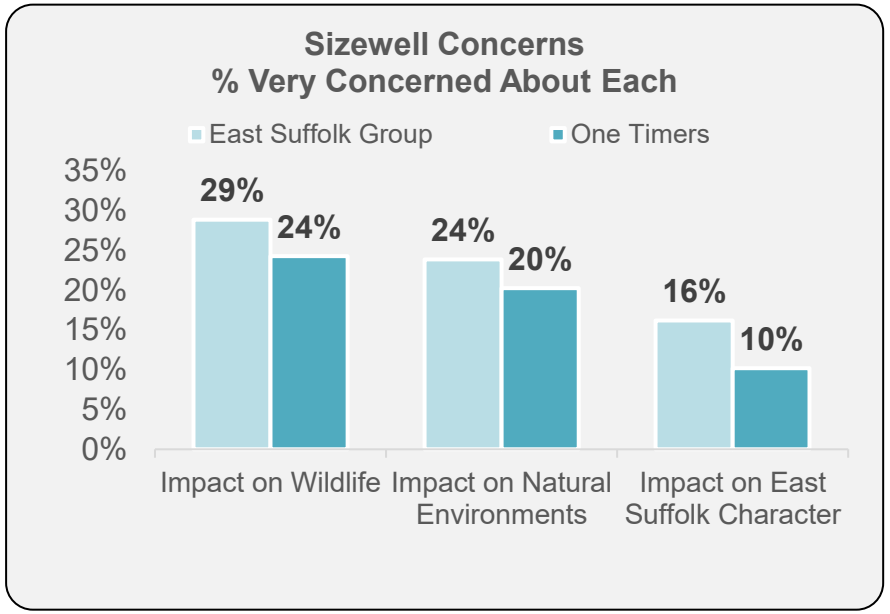
Most have visited more than once historically – but only once in last 18 months.

More likely to be bigger groups – families (without kids) and friends (55% in groups of five or more). This may mean less control over planning and that priorities change as they get older

Price a high factor – and favour self catering . This segment are slightly more likely to see ES as expensive (14%). Can offers/discounts on self catering accommodation be leveraged?

Sizewell C not a draw – less interested in seeing construction/visitor centre but are also not so concerned about the impact on nature.





Sizewell C Tourism Fund

Understanding the Segments: Local Connections



"My friend's family live in Lowestoft, so that's the first area that comes to mind"

LC, 18-34, Male, South West England

Family ties?	Generally, relatively weak engagement with East Suffolk despite the familial/friend-based link to the region
Not close to home	Key differentiator here from East Suffolk Superfans, many of whom have family links to the region, is accessibility and proximity
Life stages	This segment are often earlier in their lifestages, pre-family and often in lower paying work or with other income pressures – and so tended to only travel for specific events
Wants to see more	Yet strong interest in seeing more of East Suffolk where possible – in taking an opportunity to experience more than just the `family-offering`
Holidays in demand	Very high holiday engagement and demand – but tended to go abroad when affordable

Local Connections at a Glance

The Local Connections segment trends significantly younger (17% under the age of 25) than both the total sample and the East Suffolk Group average – with a significantly lower proportion of over-65s (4%) in the segment.

The segment also marginally over-indexes as Black British compared to the East Suffolk Group average though is in line with national representation (c.4%).

The segment is split equally along gender lines.

Income is generally in line with the average – though under-indexes amongst highest earners (4% with household incomes above £83,000).



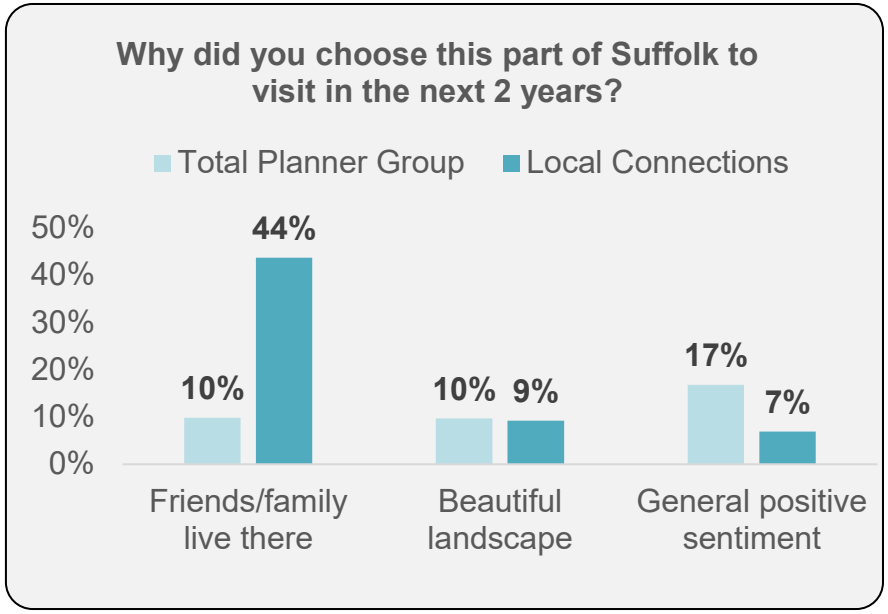
Local Connections: In Depth

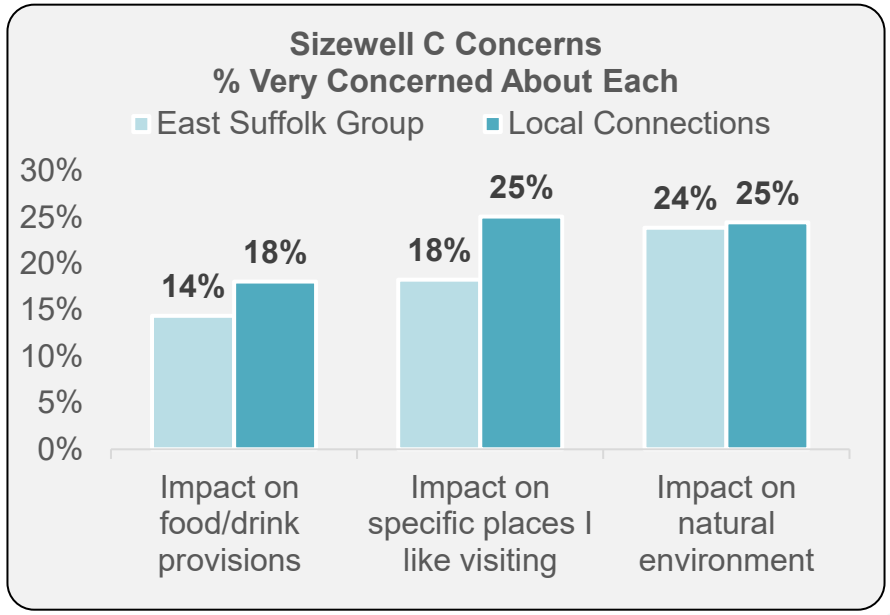
Most likely to visit to see family/friends – the location is a given, not a choice. And more likely to be staying outside the area (Ipswich) and doing day trips in than other segments. Not a big taker of domestic holidays generally.

Relatively unenthusiastic about features of the area – less likely to describe it as beautiful, peaceful, good for nature, heritage etc

Tend to travel to East Suffolk alone or as couples – with little focus on recreation or leisure. Generally, a low engagement with local attractions.

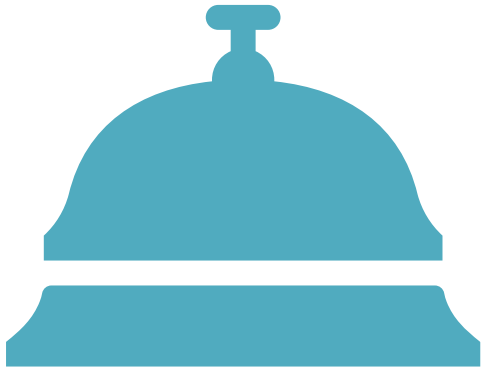
Generally positive around the Sizewell C development and see little impact on their future family or friend-related trips. Concerns, where present, trend more towards impacts on specific locations.
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Sizewell C Tourism Fund

Understanding the Segments: Hotel Stays



"It's just a holiday, to a part of the country we've never been to, you know"

HS 55-64, Male, Greater Manchester

Wealthier, smaller groups	Generally, a slightly wealthier segment, travelling alone or with smaller groups –less likely to have young children and often pre-family adults or near or post-retirement
Limited knowledge	Limited knowledge of East Suffolk, but a few had visited nearby before – though with little recollection
Planning, what planning?	Hotels are a preference, not a dealbreaker – and trips were not well planned out. Most planned to decide on details closer to the trip
Holidaying at home	Segment showed a strong engagement with domestic holidays – both in East Suffolk and elsewhere in the UK
Unconcerned with Sizewell C	Mixed views of nuclear power but generally positive - Aligned with other segments in that Sizewell C would not change their plans to visit

Hotel Stays at a Glance

The Hotel Stays segment are marginally overrepresented within the 25-34 age range (26%) – though largely align with the average across the East Suffolk Group.

The segment also leans male (57%) – and is marginally less white than the East Suffolk Group average.

Income also trends slightly higher than the East Suffolk Group average (25% having household income higher than £63,000).



Hotel Stays: In Depth

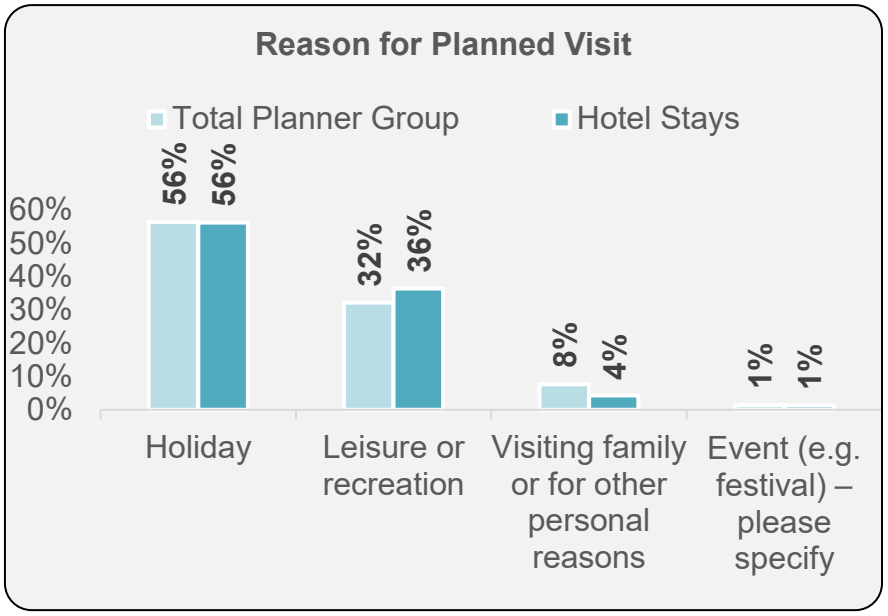
Younger, male skew and reasonably diverse – not dissimilar to Visitor segments. But come from further afield – over index among Scotland, North West England, and South West England

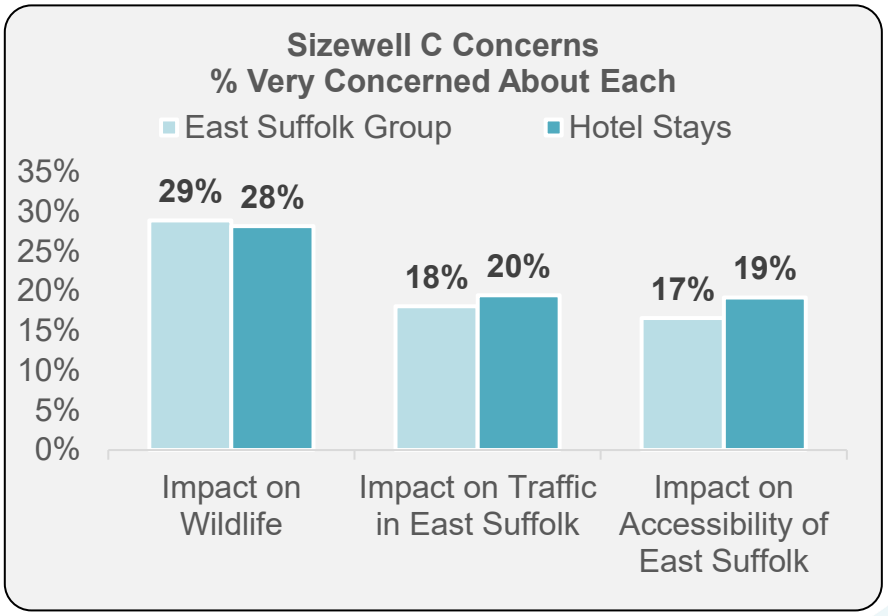
Need education/information about East Suffolk. The segment members don't know as much about the area, but positive expectations are present – especially around scenery, nature, landscapes, heritage and culture

Holiday (56%) and leisure (36%) are the key reasons for trips – eating/drinking out, walks, scenery and history are main anticipated activities

Accommodation preference is a driver but not the be-all-and-end-all. Flexibility is possible depending on availability and trip specifics.

Need some Sizewell C reassurance – generally positive but concerns about wildlife and traffic are present





Sizewell C Tourism Fund

Understanding the Segments: Self-Caterers



"I think I find it easier, just with having a larger family, to do [self-catered]"

SC, 35-44, Female, East Midlands

Families on tour	Tended to travel or plan to travel in larger family/friend or multi-family groups – driving accommodation preference
Price comes first	As with the Hotel Stays segment, accommodation choice is a strong preference – but not a dealbreaker. Location, and price, come first
Diverse accommodation	Show a wide diversity of accommodation preferences within self-catered. The desire to have a `base-camp` was a strong driver
Positive East Suffolk associations	Perception of East Suffolk as a coast that has not been `left-behind` in the same way as some other UK coastal regions. Little SZC concern
Rural and British holidays	Strong engagement with UK holidays and locations – with interest in repeat trips to East Suffolk if planned trip was a success

Self-Caterers at a Glance

The Self-Caterers segment trend slightly older than other segments across the East Suffolk Group (36% aged over-55) – under indexing amongst 25-34-year-olds (18%).

They also over-index as female (55%), a key difference from other segments – and above even the full nationally representative sample average.

The segment is marginally more represented amongst mid-to-lower income groups (54% with household incomes under £41,001).



Self-Caterers: In Depth

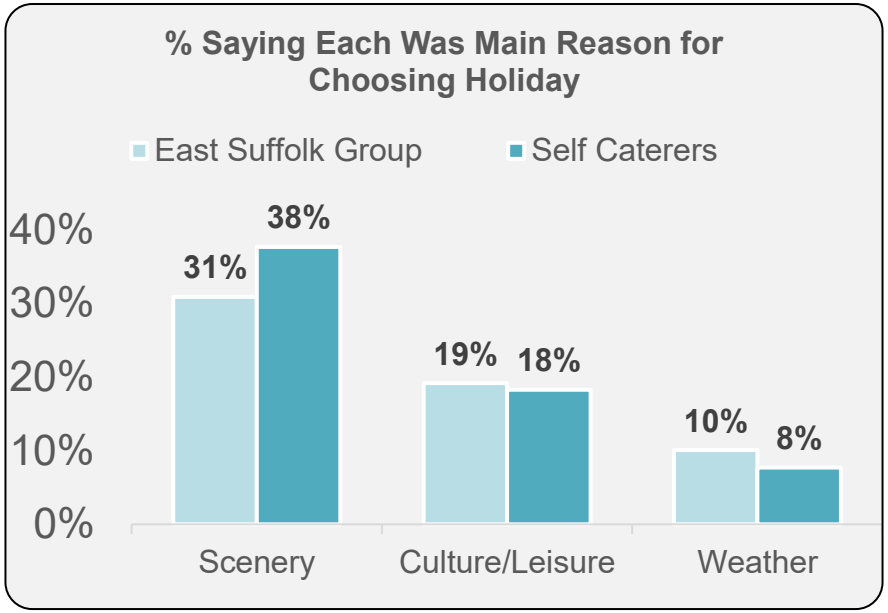
Some similarities with Hotel Stays – less familiar with the area but East Suffolk appeals for a peaceful, scenic holiday.

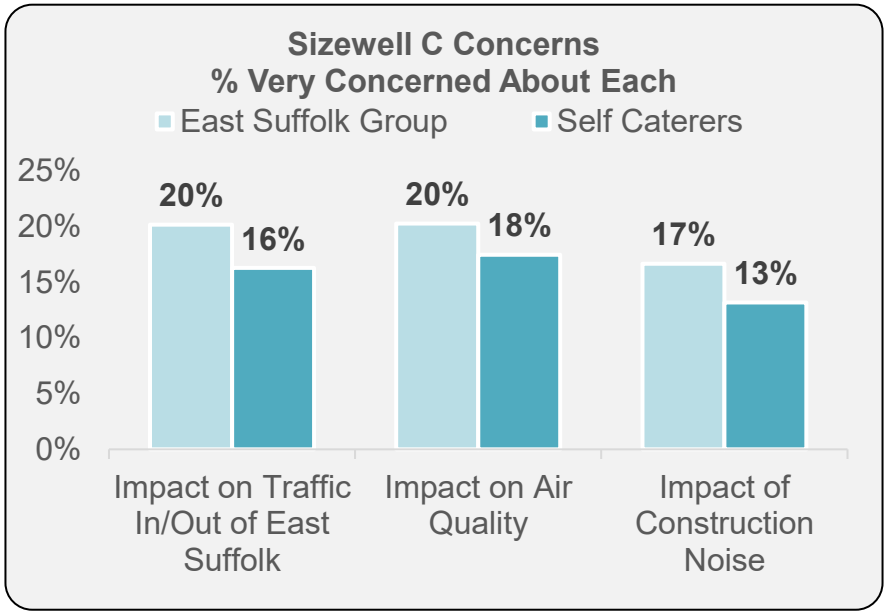
Thinking about a longer stay in 2026 (4/5 nights+) with a larger group – most with children, and some with more than 1 family unit

Looking for a base camp – Airbnb, cottage accounts for 2/3rds of group, around 1 in 6 will camp. Yet a diverse range of choices across the self-catering options – indicating a broader engagement with stay types

Activities are heavily nature-oriented across the segment

Sizewell C has a notable impact – less pro-nuclear or pro-development than other groups (also less likely to have heard of the development). Higher than average likelihood that SZC deters visit (only 21% disagree with the statement that the development may make it more likely they visit other areas of the UK) – despite lower levels of specific concerns across the segment





Sizewell C Tourism Fund

Understanding the Segments: Relaxation Seekers



"The main drawback, for us, is just that little bit of distance."
RS 55-64, Male, Staffordshire

Older and retired	Trended older and post-retirement – often with adult children and/or living alone or with a single partner
Holidays matter	Generally high engagement with holidays – with a significant volume of trips in both the UK and abroad
East Suffolk next?	More well travelled than other groups, considering a trip to East Suffolk as one of few places left to visit in UK. But distance acts as a block
Stand out in a crowd?	No overt attachment to East Suffolk, think it would be nice to visit but it doesn't stand out compared to other UK destinations
Nuclear? What nuclear?	See nuclear power as necessary, although not perfect. Low SZC awareness and very few concerns

Relaxation Seekers at a Glance

The Relaxation Seekers trend the oldest of all segment – massively over indexing amongst the over-65s (30%). This is reflected in a significant under-indexing amongst younger age cohorts (16% aged under 35).

There are also notable trends towards white ethnic backgrounds (92%) and the female gender (54%).

Income is lower than average (57% with household incomes below £41,001) – likely reflecting higher rates of post-retirement living.



Relaxation Seekers: In Depth

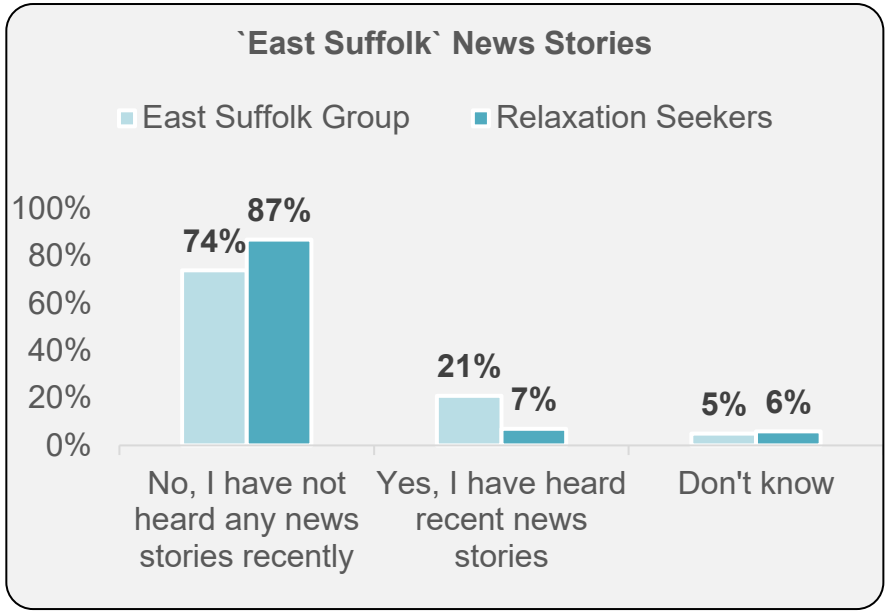
Less likely to follow through on considered visits due to broader demographic challenges. Segment trends much older and is less likely to be local. Lower income and savings are also likely to have an impact

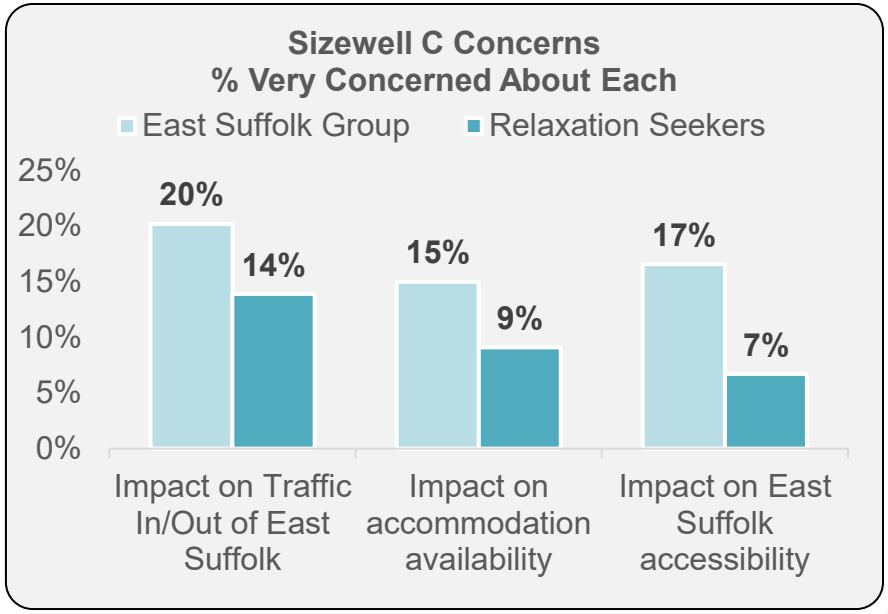
Not very engaged with East SuffolkS – don't know the area (8% with strong knowledge of region) and haven't seen recent news stories. More positively, the segment does associate East Suffolk with scenery and peacefulness

Unlikely to visit soon – most would think about a trip in 2026 or beyond, and exclusively in the spring/summer

Sizewell C may deter visits – the segment presents low interest in seeing construction / visiting the centre, and has generally lower levels of positive sentiment regarding nuclear energy generally

Over-index as a TV audience – social media much less relevant





Sizewell C Tourism Fund

Understanding the Segments: Casual Considerers



"I'm very easily influenced by Instagram and TikTok, to be quite honest"

CC, 35-44, Female, Yorkshire

One segment, two groups	The Casual Considerer segment can be broken down into two groups. Those with very little engagement or knowledge – and those with low knowledge but high engagement with UK holidays
Low engagement, low knowledge	This first, low engagement and low East Suffolk knowledge group, had little connection or overt interest in East Suffolk – it was one of many possible destinations, and not high on the list
Highly engaged and want to learn more	This second group, despite low knowledge, was eager to learn more about East Suffolk and increasingly engaged with it has a holiday destination. Turning them into visitors is possible
Social media forward	Social media a strong driver of holiday planning and engagement across the segment
Sizewell C?	Varied engagement with Sizewell C – but little in the way of active concerns or perceived impacts on holidays

Casual Considerers at a Glance

Age is diverse across the Casual Considerers segment – though they slightly under index across the two youngest age groups (28% aged under 35).

The segment also trends female (55%) and is generally more represented amongst lower-to-middle income groups (59% with household incomes below £41,001).

Ethnically, this segment largely aligns with national averages whilst their location within the UK trends towards being more geographically diverse than other more closely East Suffolk-aligned segments.

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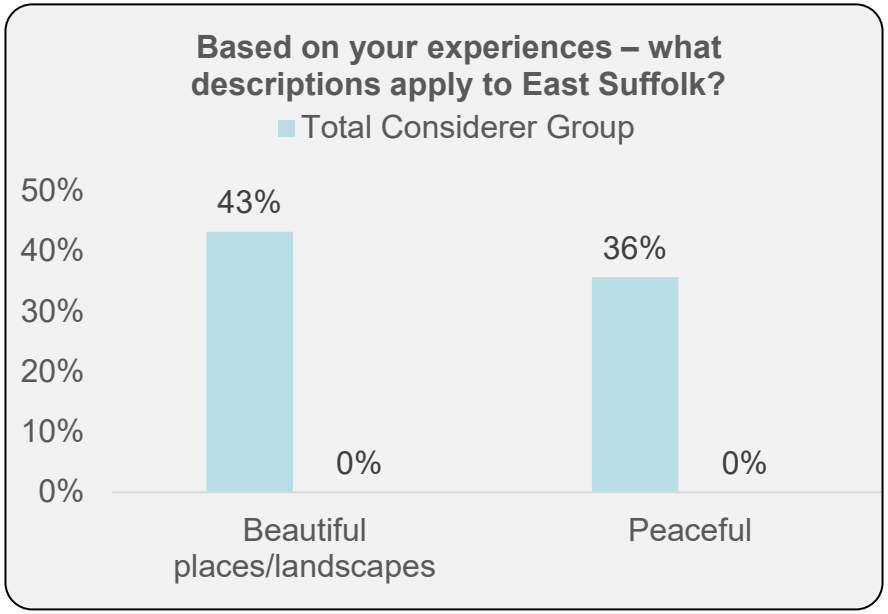
Casual Considerers: In Depth

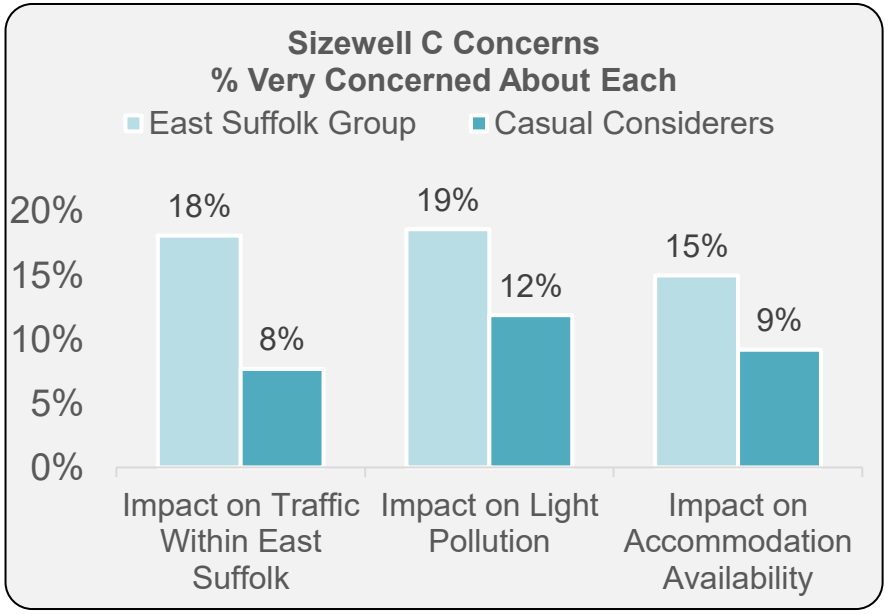
More likely to be distant from East Suffolk (only 14% living within a 2-hour journey). Relatively low income and savings means shorter journeys may be more appealing?

Very low knowledge of area – significantly lower awareness than other segments (93% with low or no knowledge of East Suffolk), many haven't heard of East Suffolk at all

Low enthusiasm for location and little interest in key visitor attractions or activities. More concerningly still, the segment has non-existent associations around aspects that are strongly represented amongst other segments – around natural beauty and peacefulness.

Not negative about Sizewell C, with concerns generally indexing lower than other segments, but it could be another factor keeping them away





Sizewell C Tourism Fund

Sizewell C

Tourism Fund

APPENDIX F – Sizewell C Tourism Fund Visitor Perceptions Research – Segment Analysis



Segment Analysis Presentation | All Segments

August 2025

About This Presentation

This presentation includes:

- A breakdown of the survey structure, methodology, and approach
- An explanation of the segmentation and its logic
- An overview and key recommendations for each segment based on the full survey
- Further details on each segment

Today's aims:

- Introduce each segment and distinguishing features
- Start thinking about persona development and qualitative research



Project & Survey Methodology

With East Suffolk Council and Sizewell C looking to understand broader East Suffolk visitation trends alongside the possible impact of the Sizewell C development on visitation to the region this deck represents the detailed segmentation of an online, nationally representative, survey of 12,564 members of the British population.

The survey was in field from the 26th of June 2025 to the 23rd of July 2025 and included an initial set of demographic and East Suffolk awareness questions that were asked of the full sample. A further set of East Suffolk visitation questions, including on past visits over the last 18 months and planned or considered future visits, allowed that sample to be broken into a non-visitor group – then screened out of the full survey – and a group of 4,000 past or future East Suffolk visitors.

This East Suffolk Group then engaged with a range of questions including:

- More detailed East Suffolk awareness questioning
- Further demographic and financial questions
- Questions on past/future East Suffolk visitation behaviour
- Sizewell C awareness and perceptions
- Broader tourism attitudes and behaviour
- Media engagement
- Wider social and personal attitudes

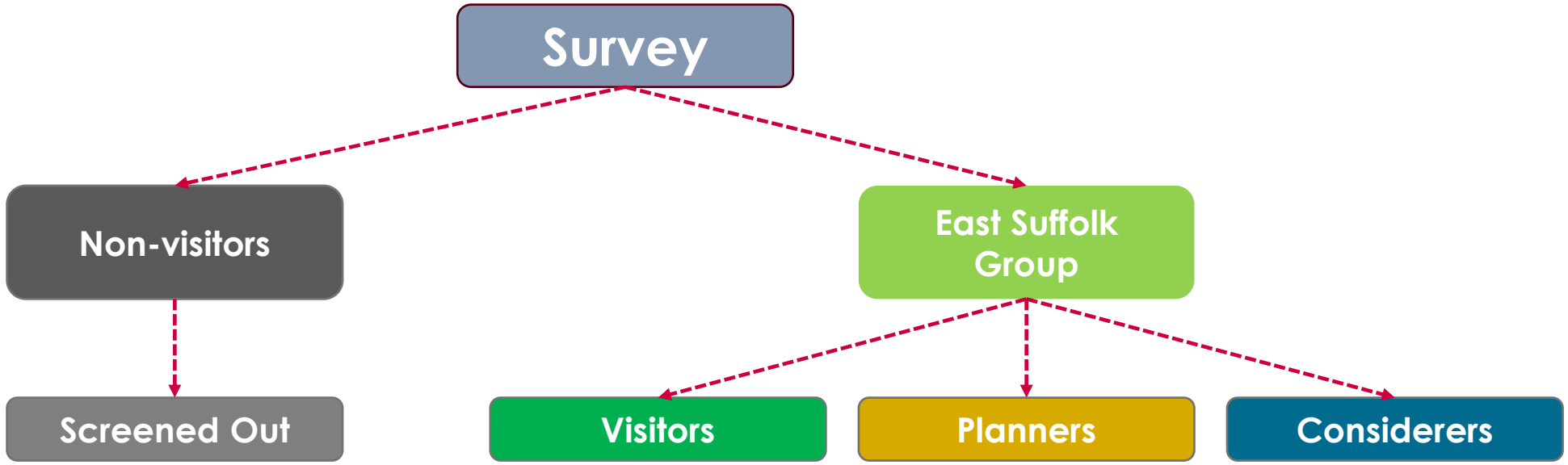
This more detailed survey allows us to break that group into seven useful and useable segments – details of which are available across the following slides.

Understanding the Survey

The survey responses can be broadly broken down into two groups – a larger group (8,564) of people who have not visited and do not have plans/considerations to visit East Suffolk and then our main focus, a group of 4,000 made up of those who have previously visited Suffolk (since January 2024) and/or have plans to or would consider visiting East Suffolk in the near future (2 years).

All will have answered the East Suffolk awareness questions – but only that latter group will have answered the main body of the survey.

To gain a better understanding of this latter group we can break it down into three subgroups – those who've visited since January 2024, those who have plans to visit in the next two years, and those who would consider visiting in that same timeframe.



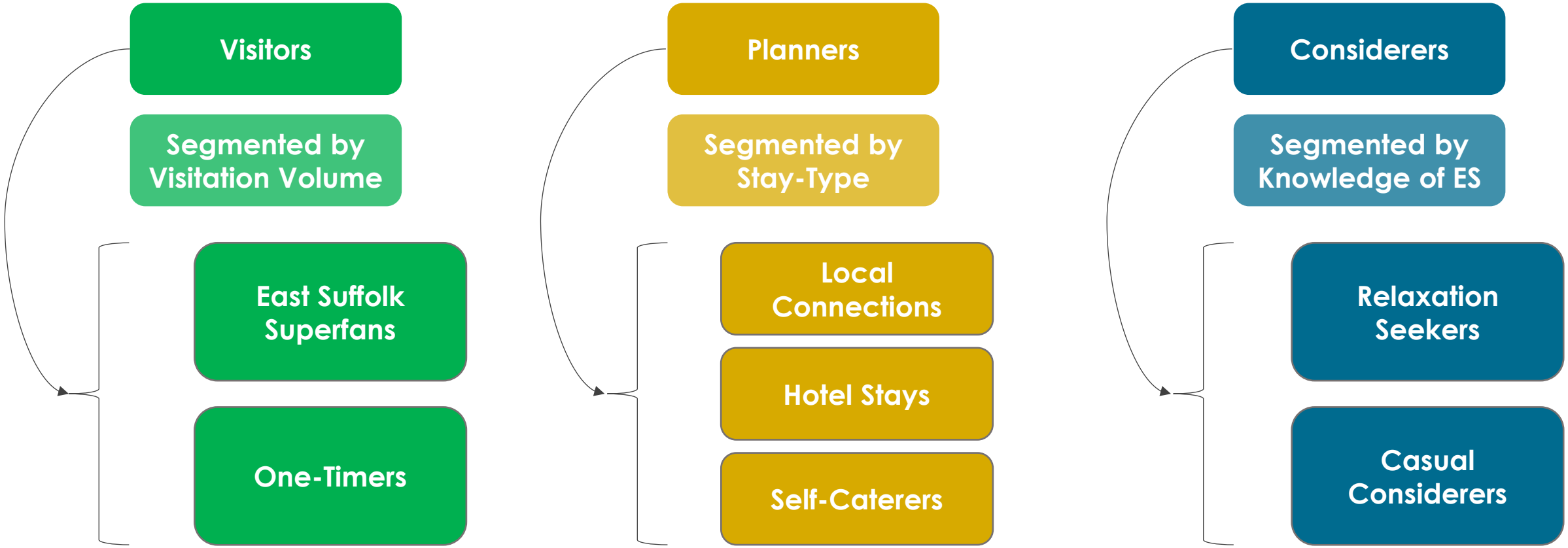


Segmenting the Sample

Approaching the Segmentation

The structure of the survey naturally breaks the sample into three groups – those who've visited recently, those who haven't visited recently but plan to do so, and those that haven't visited recently but are open to visiting in the future

By breaking down each of these three groups into their own segments we're able to create a more nuanced, but still understandable, segmentation.

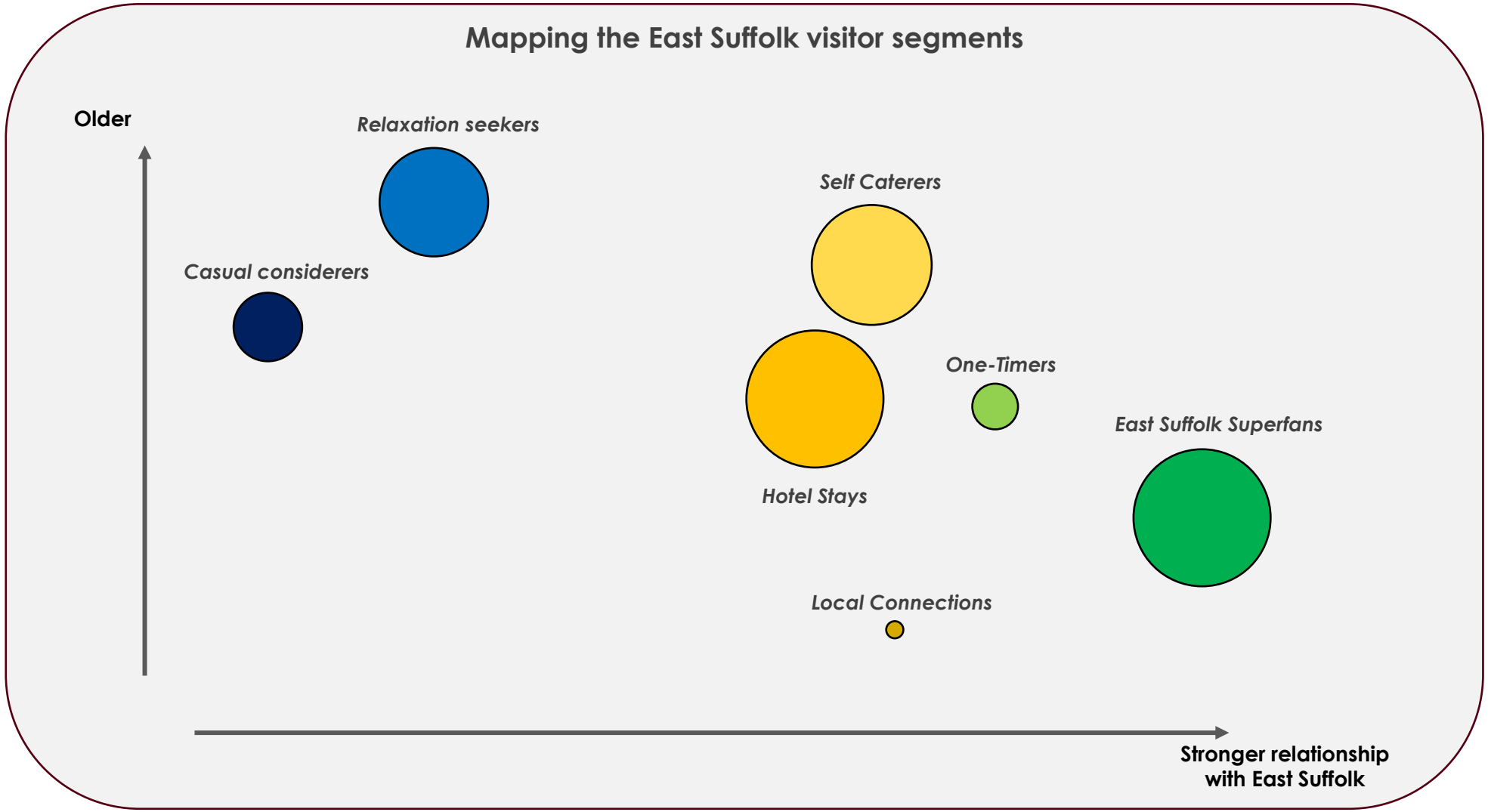


Segment Comparison

	East Suffolk Superfans	One Timers	Local Connections	Hotel Stays	Self-Caterers	Relaxation Seekers	Casual Considerers
Demographics	Younger, trending male, and living close to Suffolk	Trend slightly younger than average – but ethnic. and gender in line with average	Strong young (18-34) representation – otherwise align with ES Group avg.	Largely representative age break – trend male	Trends slightly older, but only marginally, and over-index female compared to ES group	Trend the oldest of all segments and lean white and female	Diverse age range – though index slightly older and female
East Suffolk Awareness	Highest recognition of East Suffolk and awareness of news	East Suffolk recognition high but below ESS segment	Recognition and awareness of ES group trends highest of non-Planner segments	Middling to average ES awareness and recognition	Awareness and recognition is slightly lower than ES group average	East Suffolk awareness and recognition lower than non-Considerer segments	Lowest ES awareness and recognition across all segments
East Suffolk Engagement	High levels of past visitation and future planned visits – diverse visitation behaviour	Less regular visitation and no concrete future plans for visits – less likely to visit w/ children	Planned visits are to see family or stay at second home – reflected in higher rate of day visits	Mid-length visits (2-5 days) most common – in smaller groups and at non-catered accom.	Entirely plan to stay in self-catered accom. – but diverse choices within that	Particular knowledge of ES as peaceful and beautiful – diverse range of accom.	Lack of prior knowledge of ES and no link to ES as peaceful or natural
SZC Perceptions	High awareness of SZC – relatively high levels of support and concern	Marginally above average SZC awareness – lower concerns	Relatively high rates of SZC awareness and concern/impacted behaviour	Mixed SZC awareness and perceptions – and average impacts on behaviour	Somewhat more nuclear-hesitant – but low SZC awareness driving lower concern	Weak familiarity with SZC – driving low support and concern, but interest in learning more	Very low SZC awareness – driving low levels of support, concern, or behaviour change
Holiday Preferences	Regular holiday trips and higher than average spending	High rates of holidays but lower spending behaviour	Higher holiday spending than avg. with family visitation key driver	Trend towards mid-to-high spending on holidays – with culture/leisure key	Lower than average holiday spending – scenery strongest driver	Lower holiday engagement and spending - scenery key driver	Low holiday engagement and spending
Wider Values	Higher sustainability concern and leisure focus	Lower, but still significant, sustainability concern	Strong sustainability focus amongst segment	Strong sustainability and culture focus	Sustainability and leisure strong focuses	Culture strong driver of values	Lower engagement with sustainability or leisure than ES Group
Media	High media engagement	Generally average engagement with wide range of media	Higher engagement with written media	Higher than average media engagement	Average media engagement – slightly under-indexing on social media	Strong TV engagement but weaker media engagement elsewhere	Below average media engagement
Summary	**An engaged, younger, segment with close ties to ES**	**Younger leaning but less engaged – but with positive ES views**	**Strong connections with ES – but often not due to location itself**	**Focused on more catered, cultural, stays**	**Self-sufficient and slightly lower spending**	**The oldest segment with strong perceptions of ES beauty**	**Low ES engagement and awareness drive weak ties to region**

Mapping the Segments by Age and Affinity

Analysis of the survey allows us to map the seven segments by age, their size in the sample, and by their relationship with East Suffolk – built through analysis of several East Suffolk related questions.





East Suffolk Superfans

Have visited in the last 18 months and plan to visit again – and have often visited multiple times

Segment Analysis

7% of the population

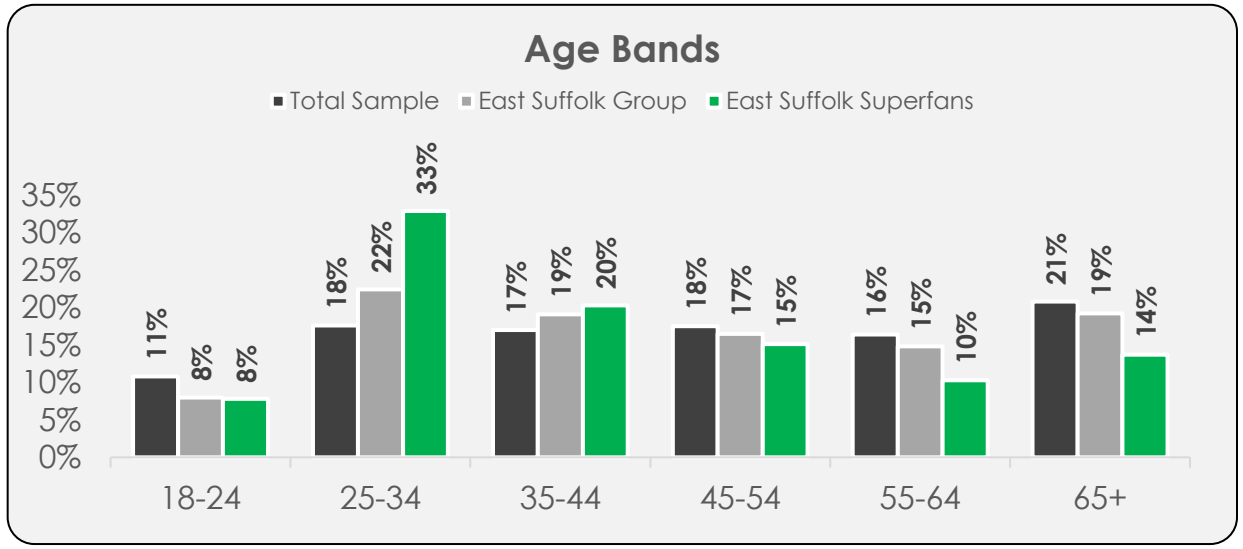
22% of the East Suffolk Segment Group

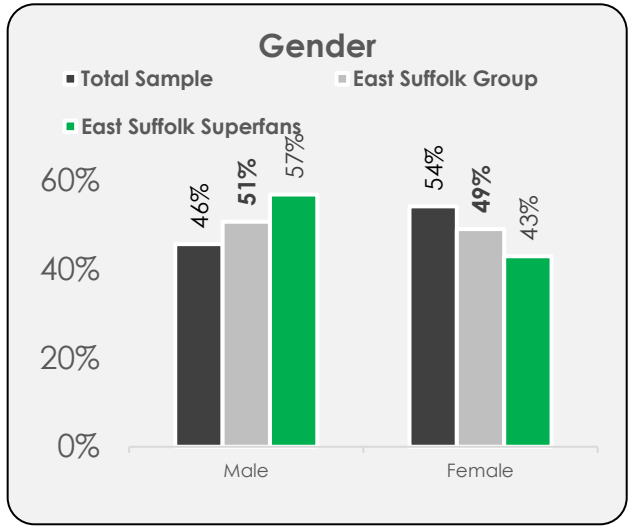
Key message: Should be a major focus. This is the core visitor group – look after them.

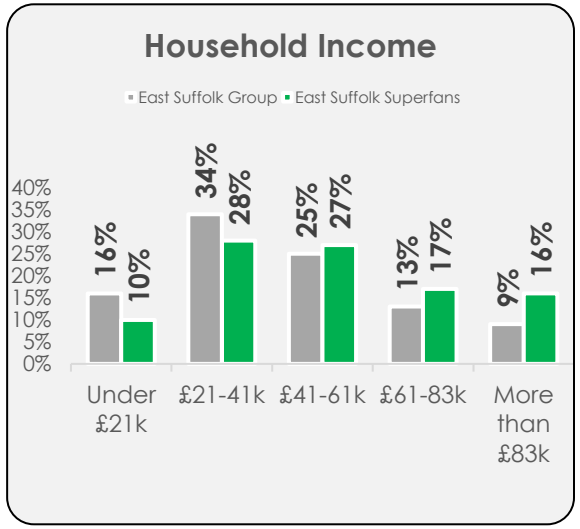
Recommendations and Understanding the Segment

- Leisure oriented and local – ES is their destination for trips to the coast. They take lots of holidays.
- Little promotion likely needed to inform them about East Suffolk. But competition for time and money means it's important to stay top of mind – and the more they hear about ES the better.
- As they age, activities with kids likely to become more relevant to them – perhaps become less likely to stay in hotels?
- Culture, history and heritage less central to their interests
- Need some reassurance about SZC – mostly pro-nuclear, just worried about impact on traffic and air quality.
- Easy to reach – social media (esp. Instagram/TikTok) / newspapers / TV all strongly represented in media analysis

Segment Demographics & Income







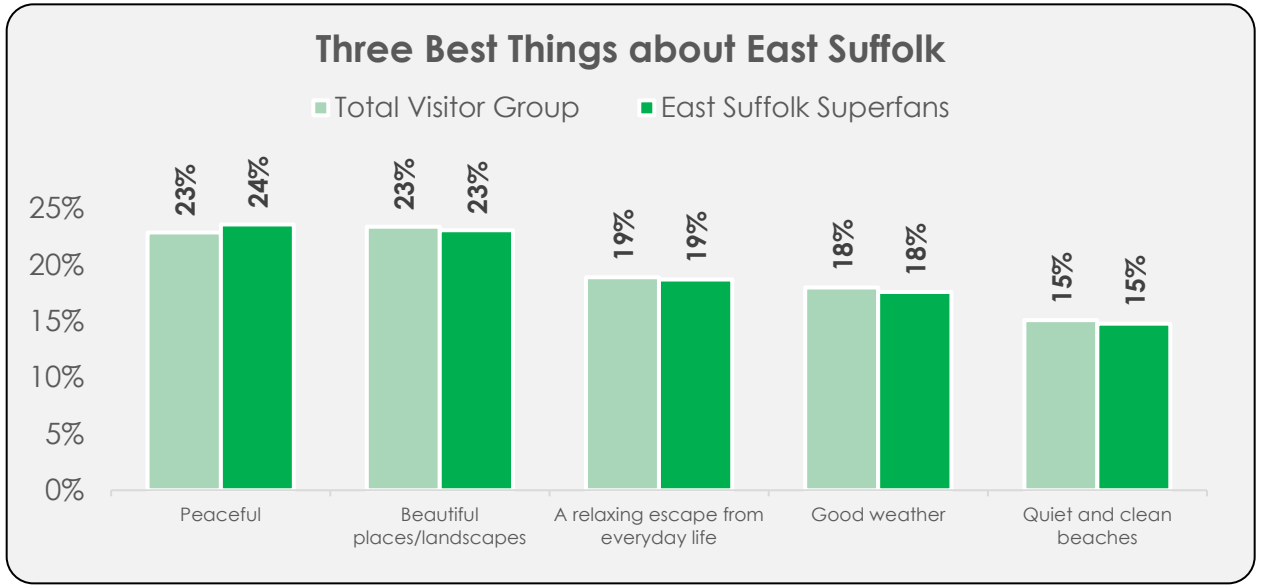
East Suffolk Superfans are significantly more likely than other segments to be aged 25-34 – whilst over half this segment is aged between 25-44.

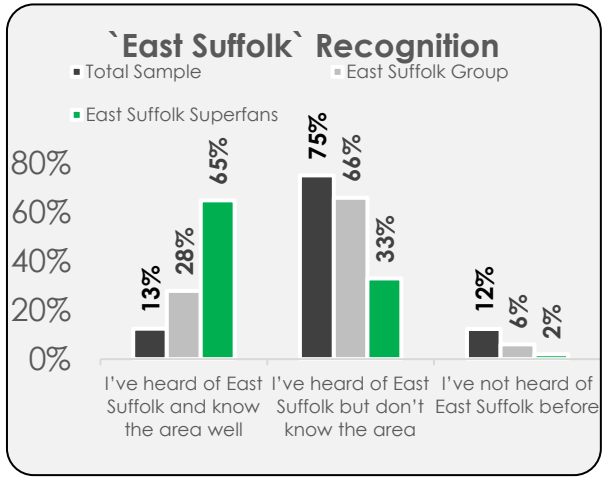
This segment also significantly over-indexes male – whilst Black British representation is also higher than both the national and East Suffolk Group averages.

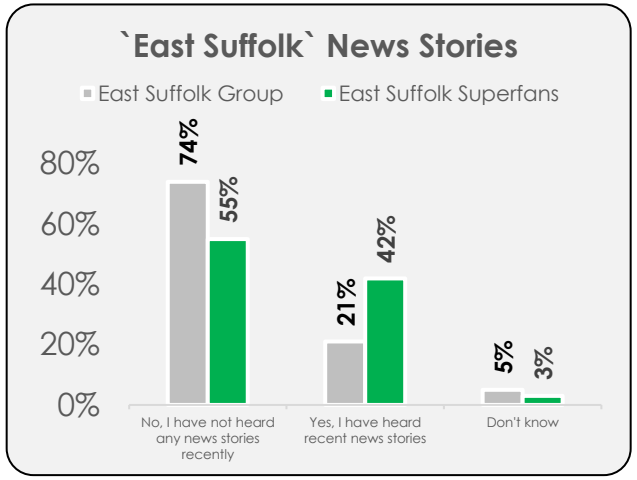
East Suffolk Superfans also trend higher income – and generally have higher savings.

Location wise – they are notable amongst all the segment for generally living relatively close to East Suffolk, through London and other South-East regions.

East Suffolk Engagement & Perception





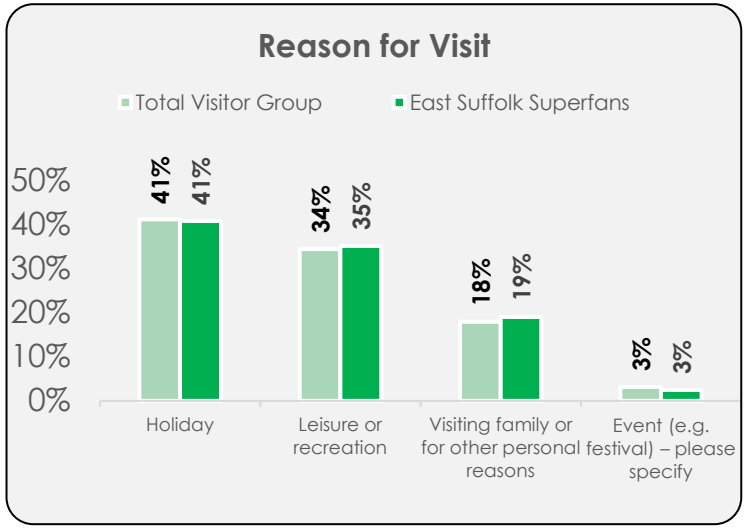


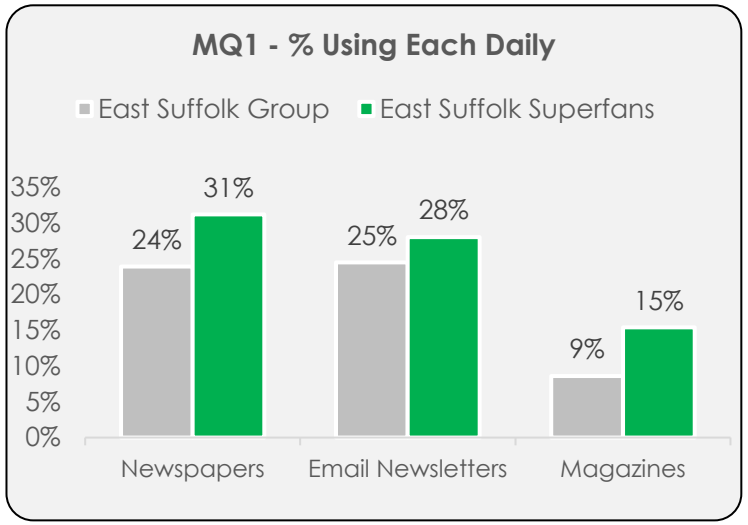
The segment has high knowledge and recognition of East Suffolk – boosted by their return visitation and high engagement.

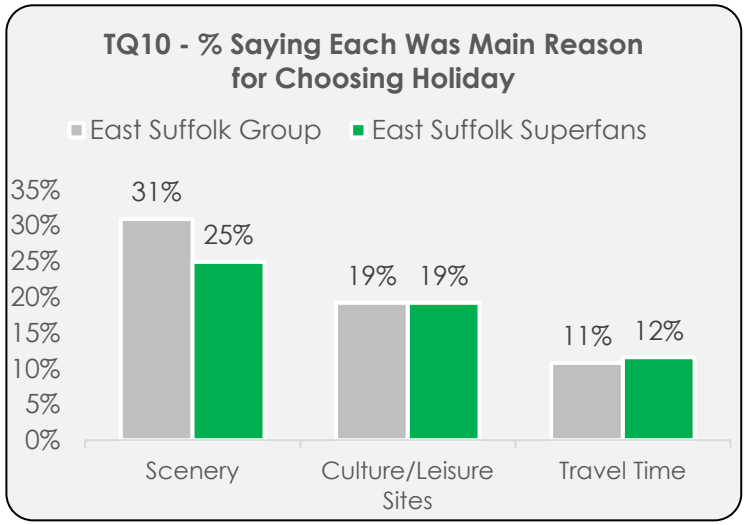
Similarly, they have high engagement with East Suffolk news stories – they're first to know about things happening in the region.

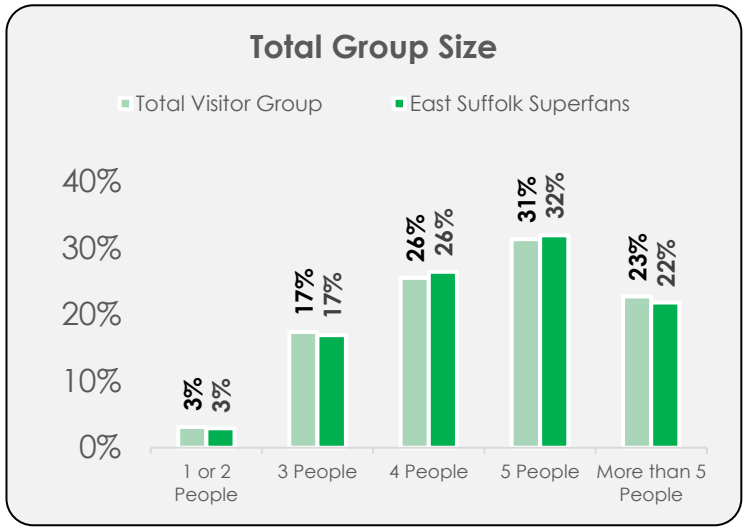
Relaxation and peacefulness are key draws – but the segment shows a wide range of positive engagement with East Suffolk.

East Suffolk Visitation and Behaviour









Reasons for visit are diverse – but holiday and leisure are strong drivers of past visits.

Leisure oriented and local – East Suffolk is their destination for trips to the coast. They take lots of holidays – but scenery and heritage is often less important for the group.

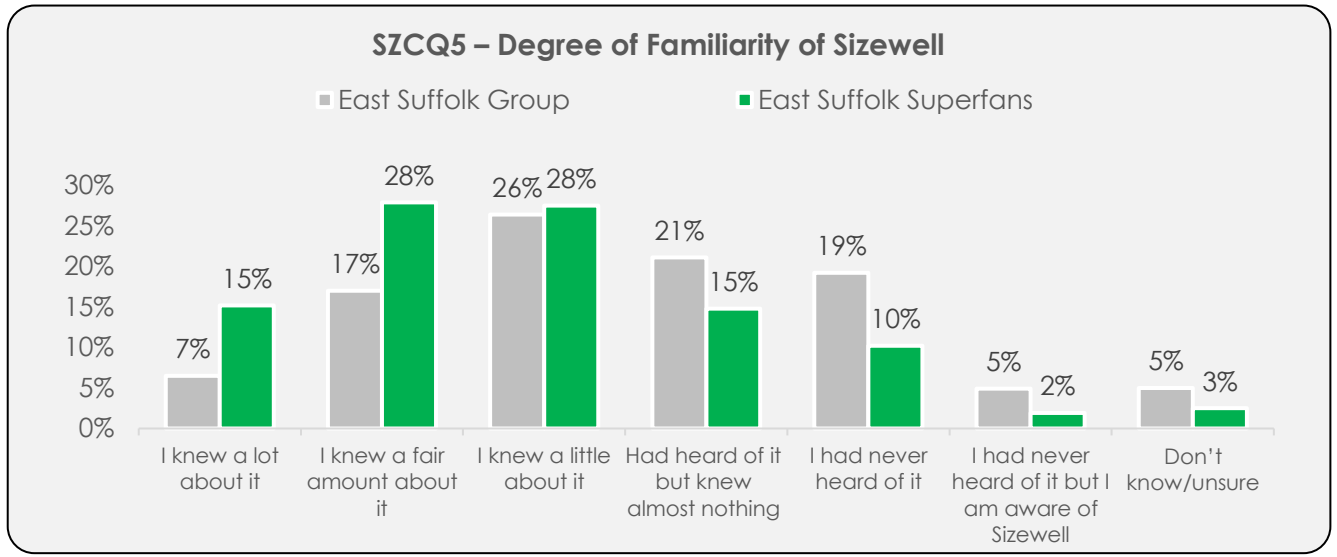
Tend to travel in mid-to-large groups – often with children – but as the segment ages it may be that child-friendly activities become less important.

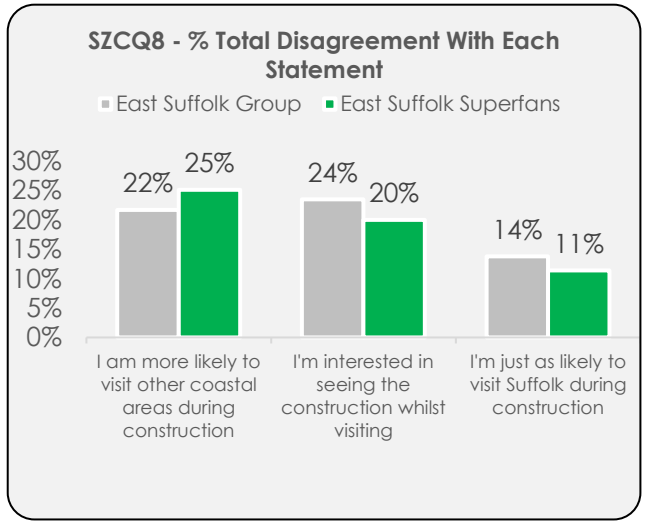
Very high media engagement – an easy to reach segment.

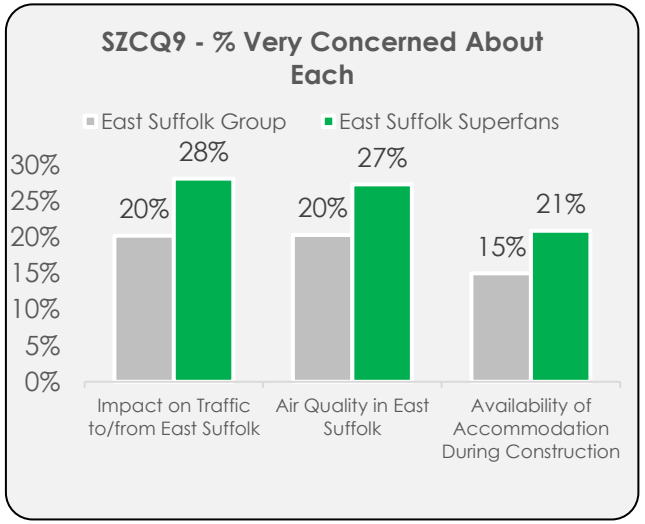
Sizewell C

Familiarity with Sizewell C is strong within this segment – with high rates of recognition and knowledge compared to other segments.

There's a noticeable split within the segment around Sizewell C – with high rates of concern and noticeable impacts on visitation behaviour amongst parts of the segment.









One Timers

Visited in last 18 months but have no specific plans to visit again

Segment Analysis

2% of the population

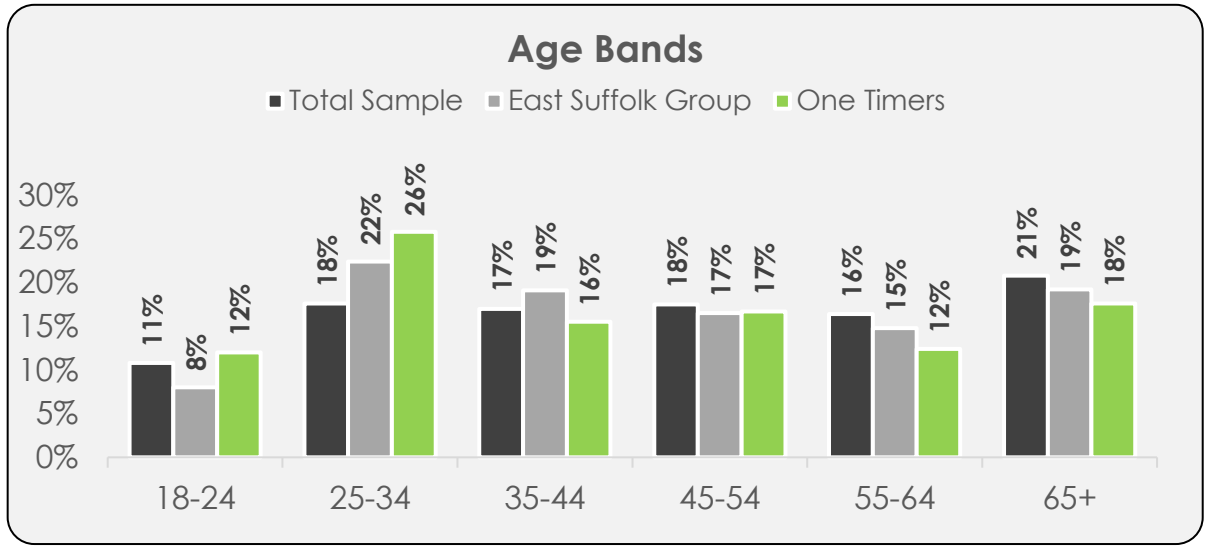
6% of the East Suffolk Segment Group

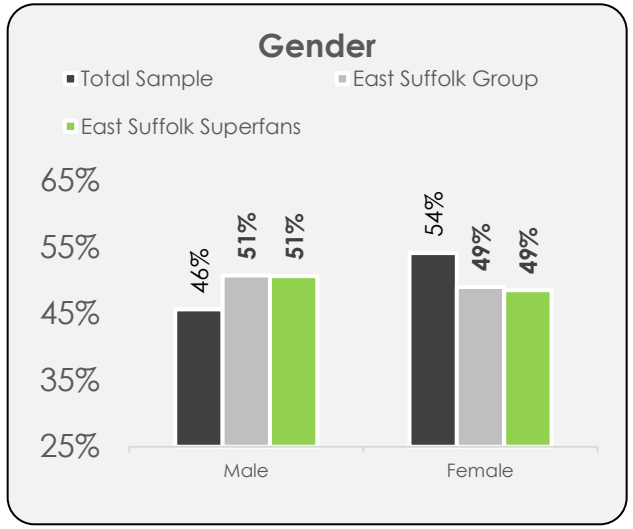
Key message: High Focus. How can they be converted into Superfans?

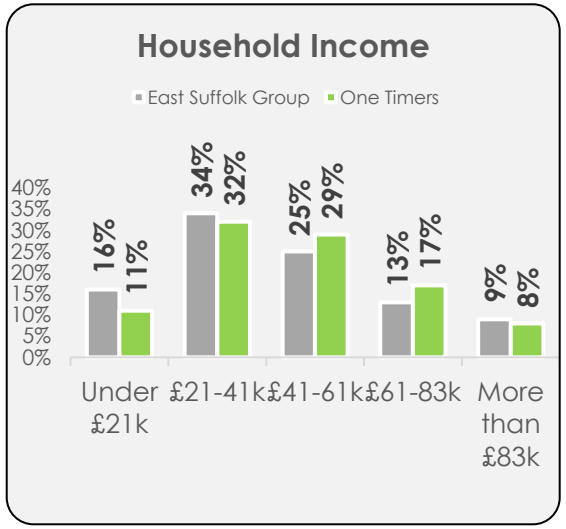
Recommendations and Understanding the Segment

- Profile similar to East Suffolk Superfans – younger, relatively local
- Most have visited more than once historically – but only once in last 18 months.
- More likely to be bigger groups – families (without kids) and friends. Might mean less control over planning and that priorities change as they get older
- Price a high factor – and favour self catering. More likely to see ES as expensive. Can offers/discounts on self catering accommodation be leveraged?
- SZC not a draw – less interested in seeing construction/visitor centre, but also not so concerned about nature etc
- Slightly harder to reach than the superfans – but TV, newspapers and social (esp. Facebook/Instagram) important

Segment Demographics & Income





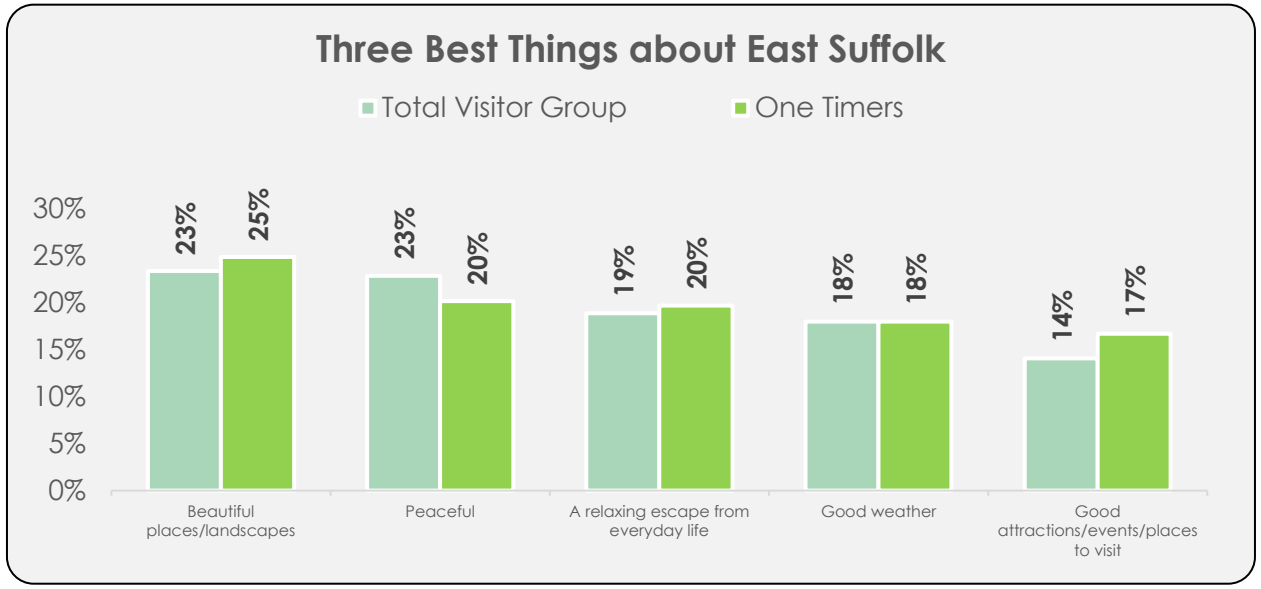


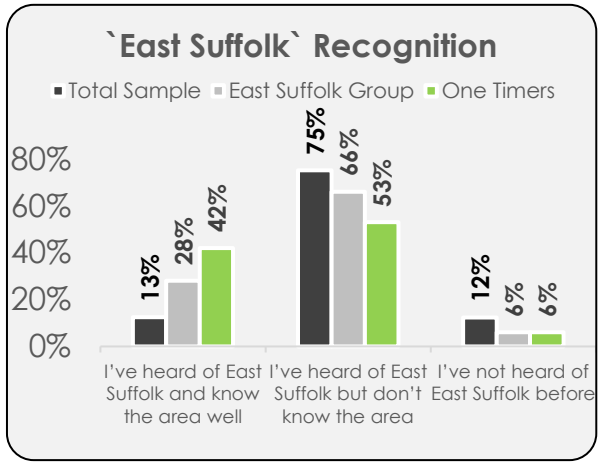
The One Timers segment trends slightly younger (25-34) when compared to both the wider population and the East Suffolk Group.

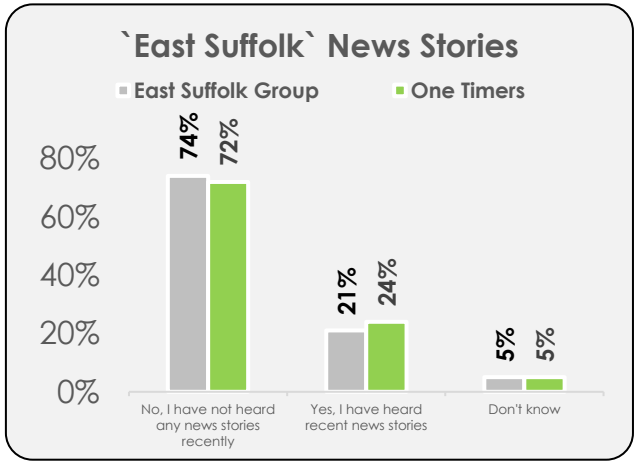
On both gender and ethnicity, the One Timers segment trends in line with the wider East Suffolk Group.

They do, however, trend slightly higher income than the average – but not to the same extent as the East Suffolk Superfans. Similarly, they trend relatively local – but again not to the same extent as the Superfans.

East Suffolk Engagement & Perception





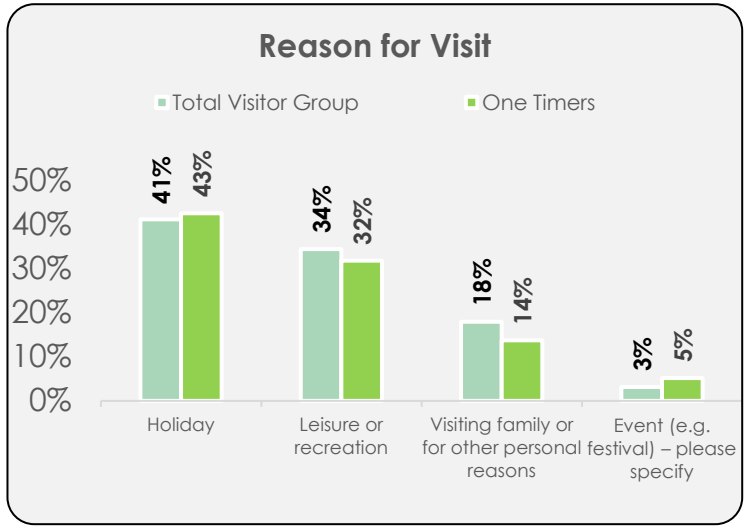


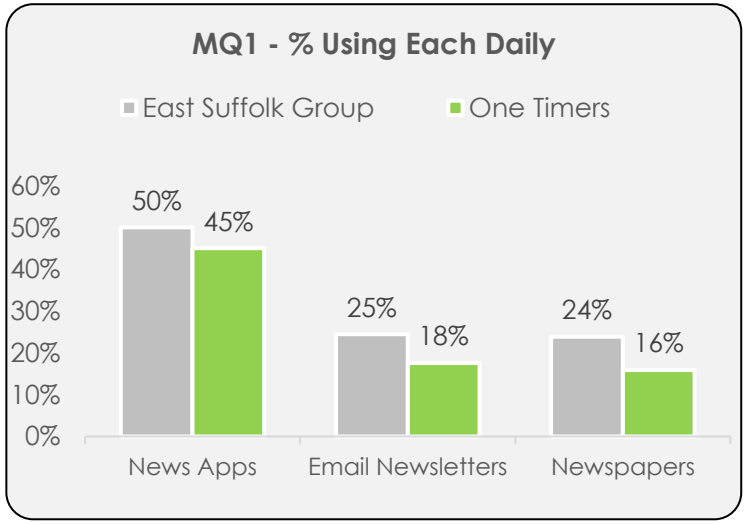
East Suffolk recognition and engagement with news stories regarding the region is lower than East Suffolk Superfans – but still noticeably higher than amongst other segments.

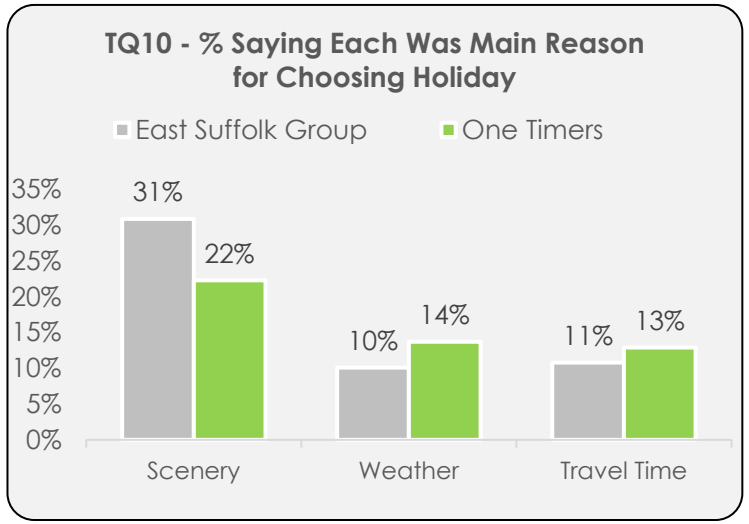
Perceptions are strongly positive – whilst they may visit less often, they tend to have positive associations.

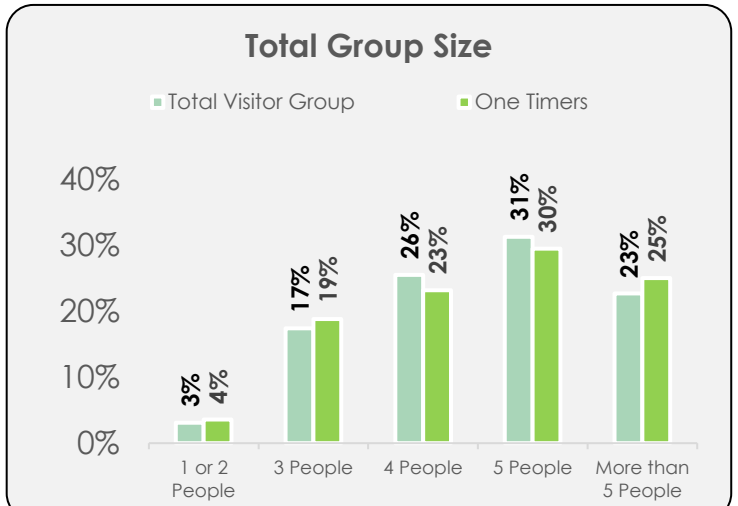
Yet with lower rates of historical visitation – what's stopping this positivity being reflected in repeat visits? The segment over-indexes for seeing East Suffolk as expensive – can discounts or offers help drive greater loyalty?

East Suffolk Visitation and Behaviour









More likely to be bigger groups – families (without kids) and friends. Might mean less control over planning or might mean priorities change as they get older.

Media engagement is lower than average – making them a harder to reach segment.

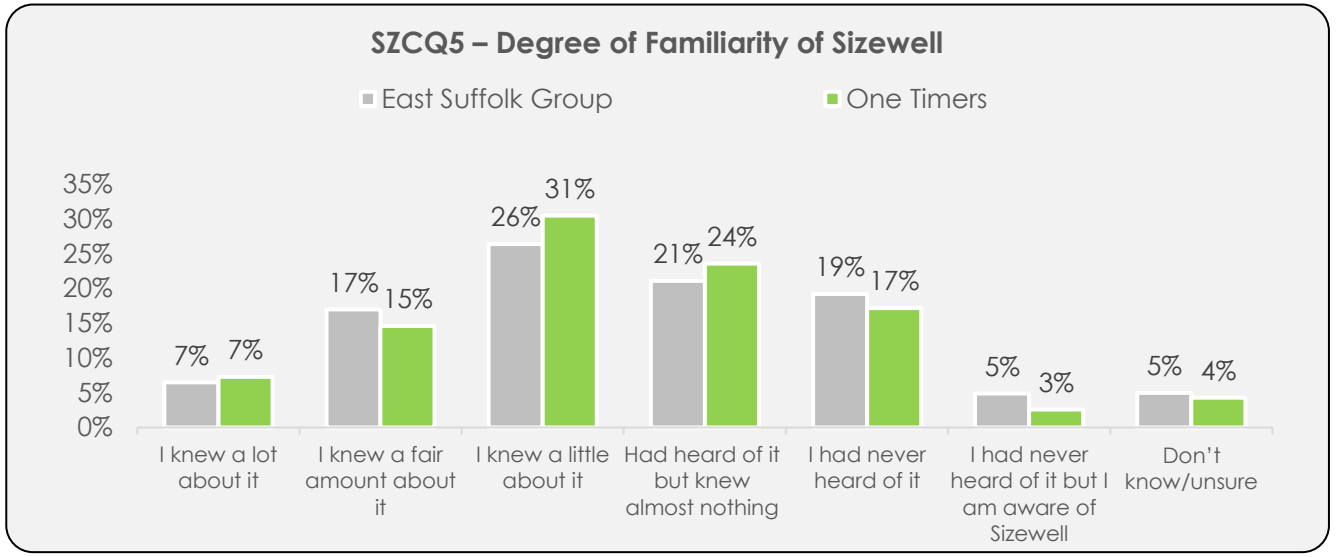
Weather, travel time, and price are key drivers of holiday decision making.

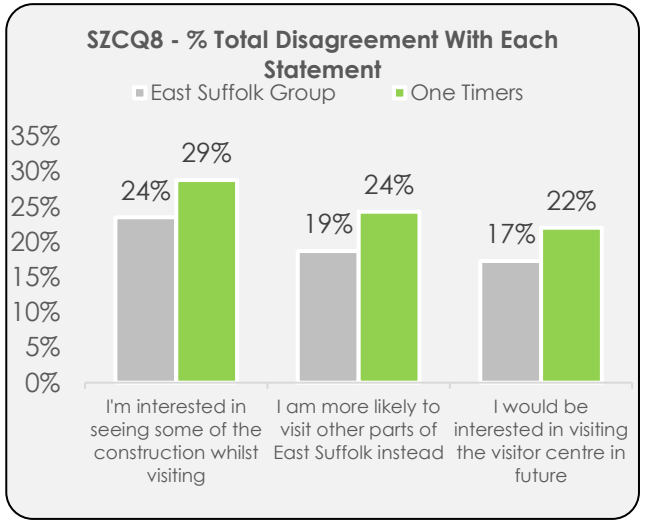
Sizewell C

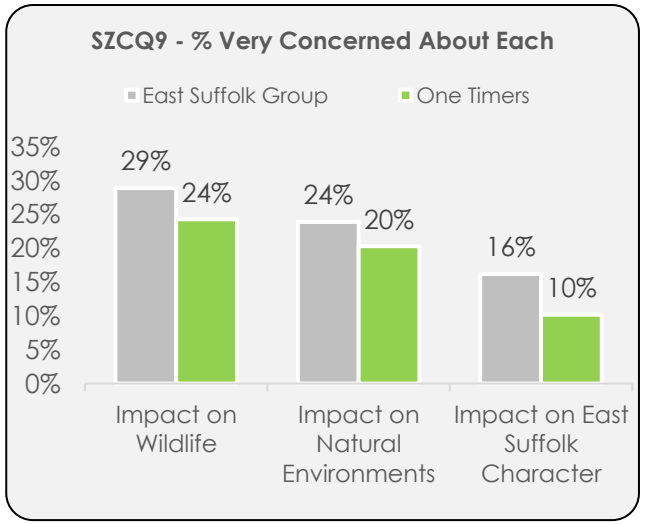
Sizewell C knowledge is high – though not as high as amongst East Suffolk Superfans.

There is lower concern around the impacts of the development – but the impacts on the segment's visitation behaviours are strong.

Can leaning into Sizewell as an attraction be a draw for those parts of the segment that are less concerned – and more interested – in the development?









Local Connections

Have plans to visit in order to visit family/friends or to stay at their own second properties

Segment Analysis

1% of the population

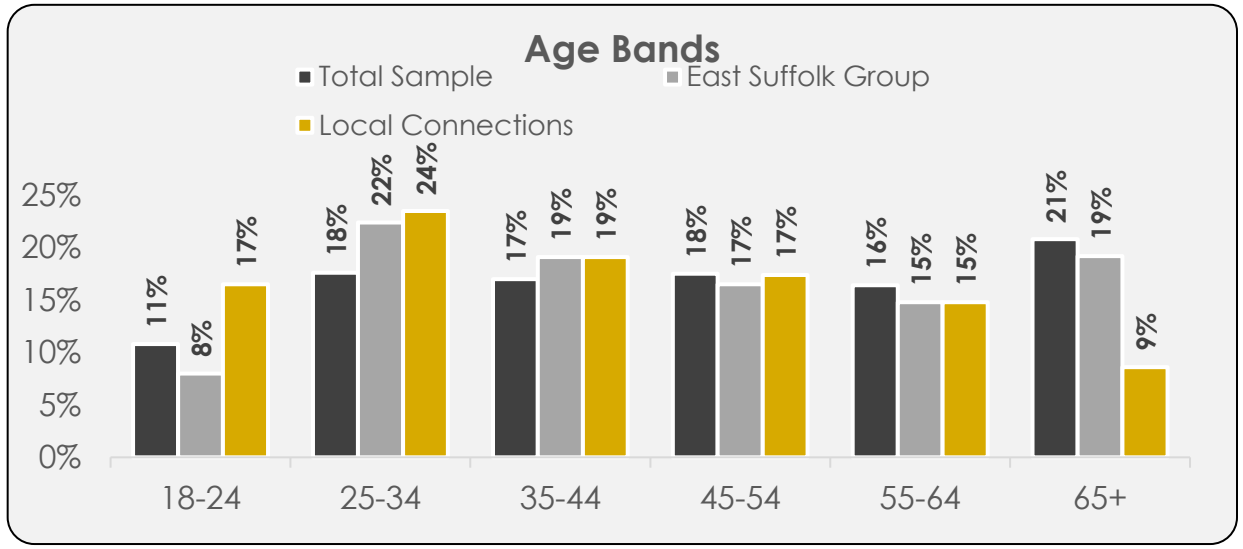
3% of the East Suffolk Segment Group

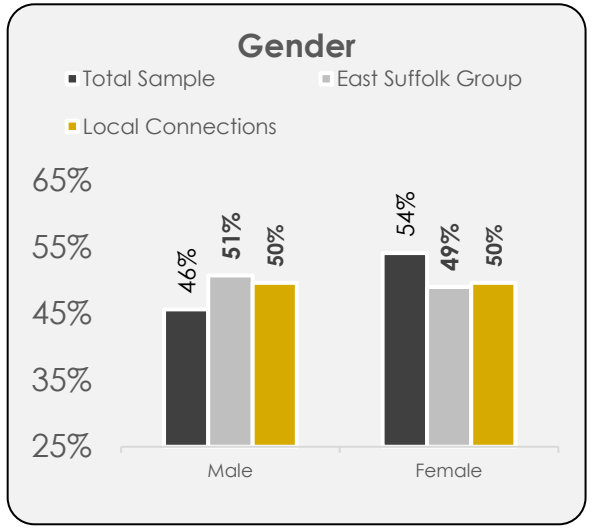
Key message: Low Priority. Very small group with non-holiday connections to the area

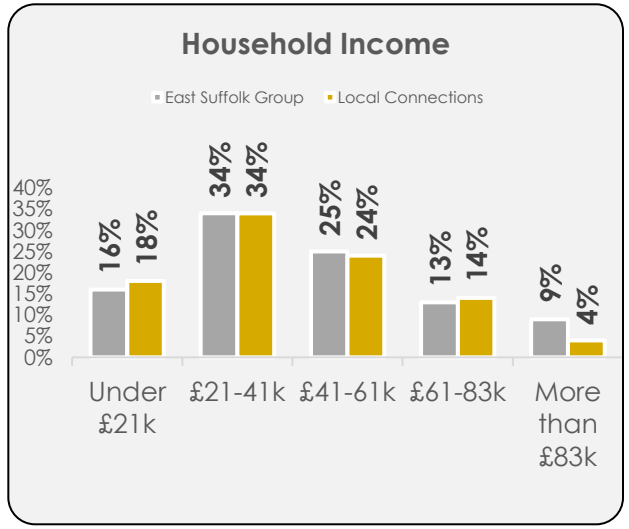
Recommendations and Understanding the Segment

- Most likely to visit to see family/friends – it's not their choice. And more likely to be staying outside the area (Ipswich) and doing day trips in. Not a big taker of domestic holidays generally.
- Relatively unenthusiastic about features of the area – less likely to describe it as beautiful, peaceful, good for nature, heritage etc
- Travelling alone or with couples – little focus on recreation or leisure. Don't expect to do much when there
- Positive about SZC and won't affect their trip

Segment Demographics & Income





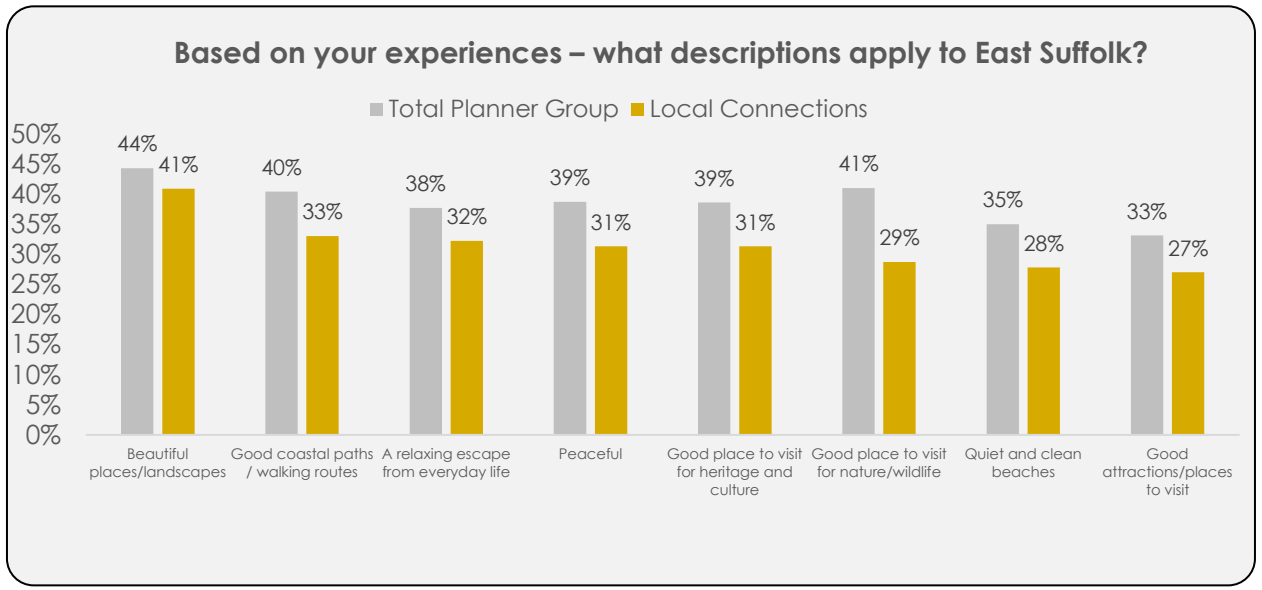


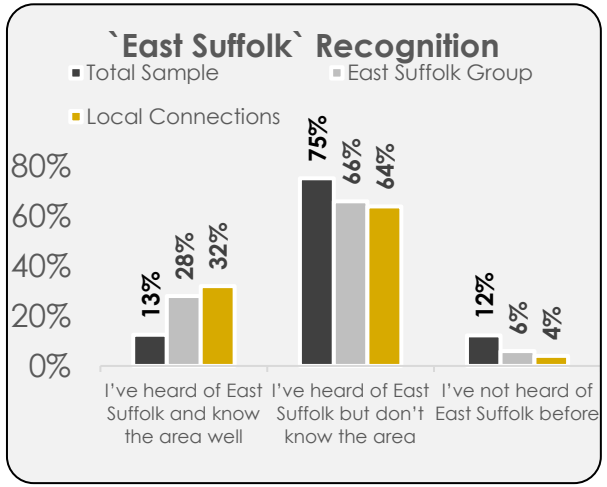
The Local Connections segment trends significantly younger than both the total sample and the East Suffolk Group average – with a hugely lower proportion of over-65s in the segment.

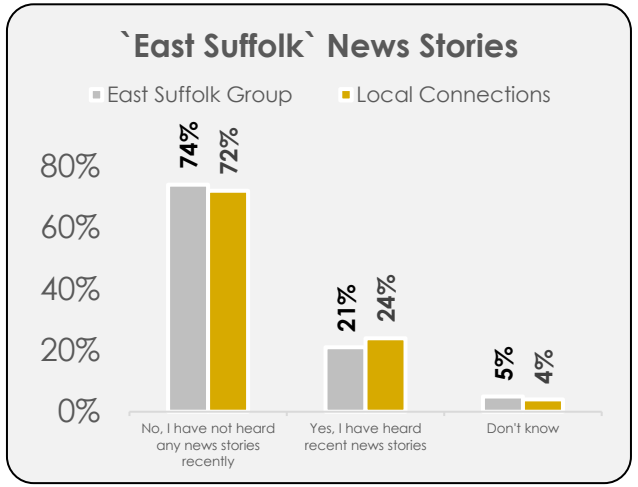
The segment also marginally over-indexes as Black British – though is split equally along gender lines.

Income is generally in line with the average – though under-indexes amongst highest earners.

East Suffolk Engagement & Perception



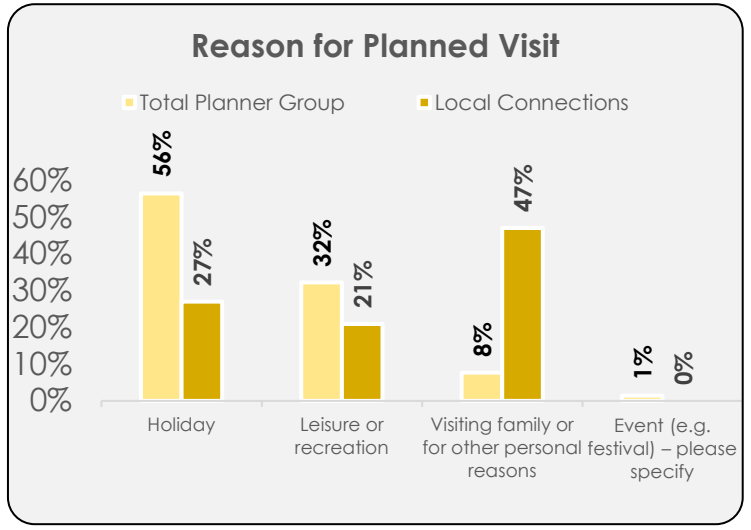


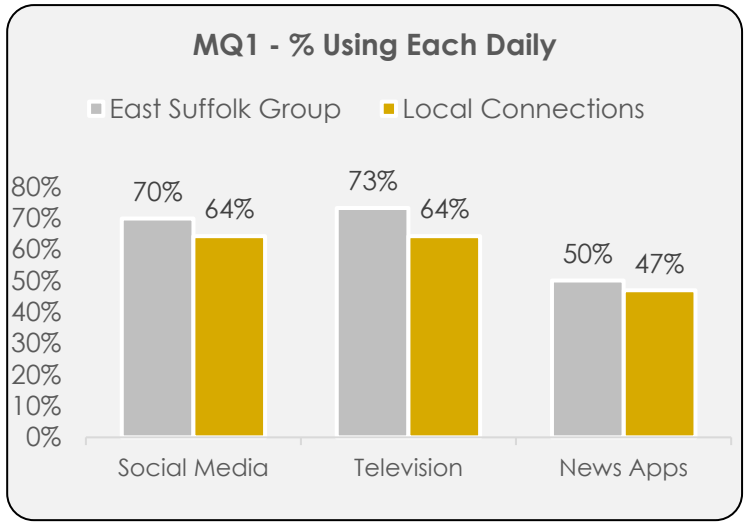


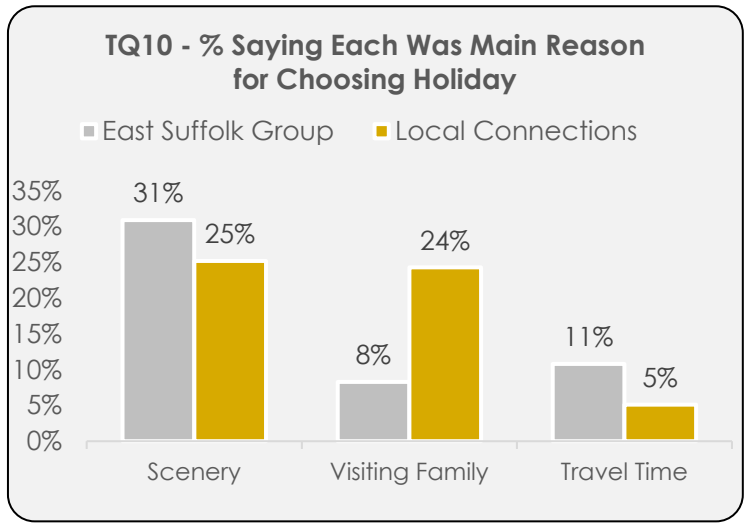
Recognition of East Suffolk, and engagement with news stories around it, is relatively high for a non-visitor group, reflecting the segment's close links with the region.

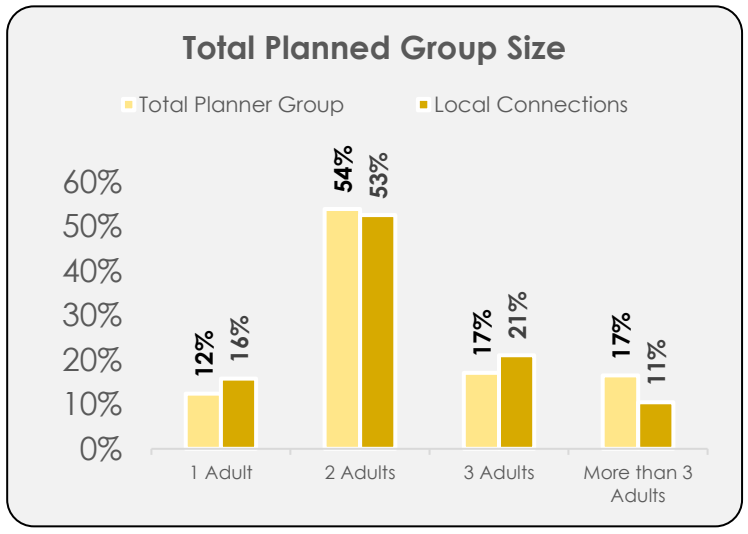
Yet the segment shows weaker positive associations with East Suffolk – it's their direct ties to the region (through family or friends) that are driving visits.

East Suffolk Visitation and Behaviour









Visitation largely driven by visiting family or friends.

Travelling alone or with couples – little focus on recreation or leisure. The segment tends not to expect to do much when there – it's about visiting people, rather than the location.

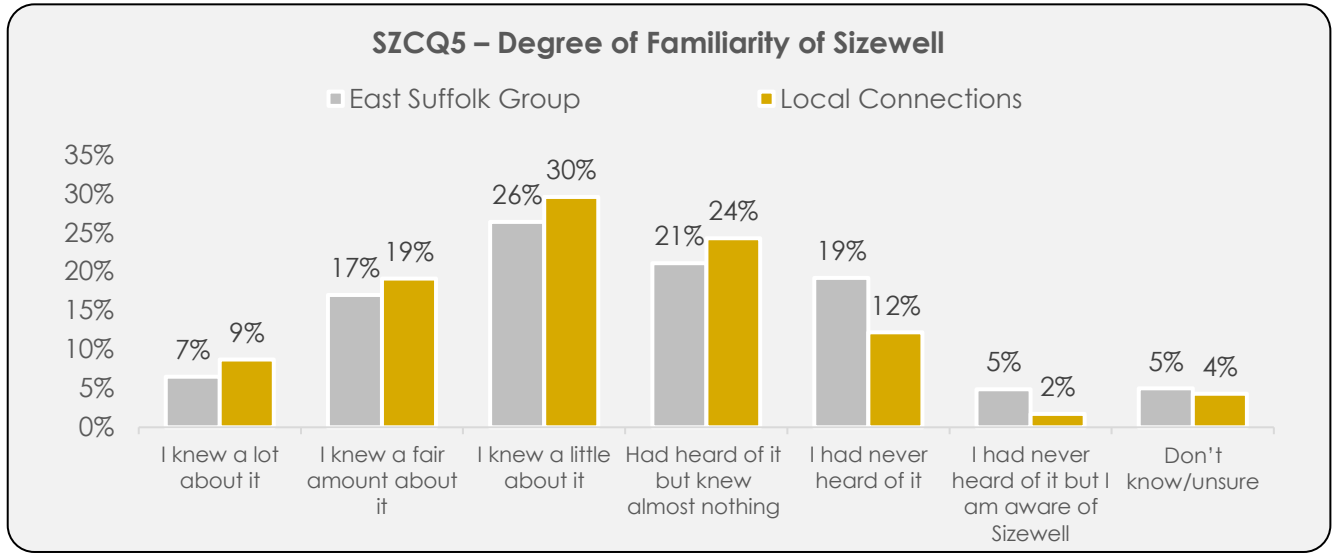
Media engagement is middling – but reaching out to the segment is unlikely to change their key drivers for visitation anyhow.

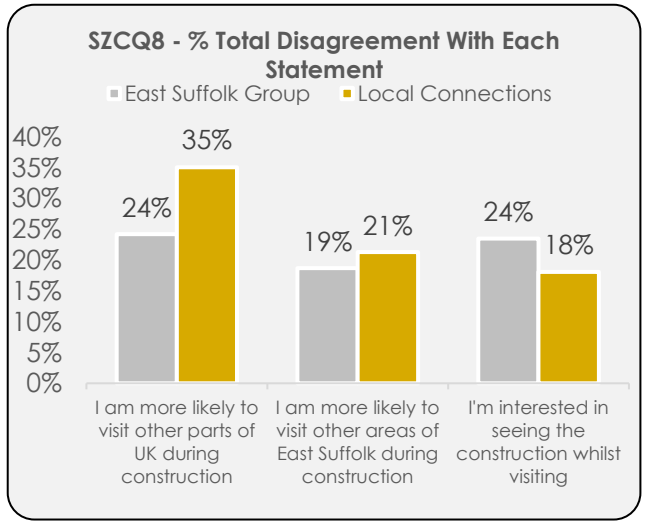
Sizewell C

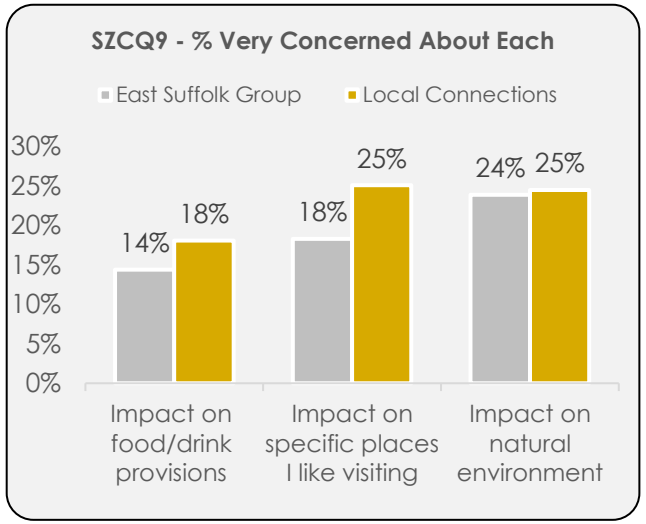
Sizewell C knowledge and recognition is the highest of all non-Visitor segments – reflecting the strong links this segment have to the region.

This segment over-indexes for impacts on visitation from Sizewell – and on their concerns over its impacts.

They have strong links to the region – but concerns around Sizewell C are likely to act as a drag on broader visitation.









Hotel Stays

Plans for visitation are based around catered stays or hospitality venues (e.g. hotels)

Segment Analysis

7% of the population

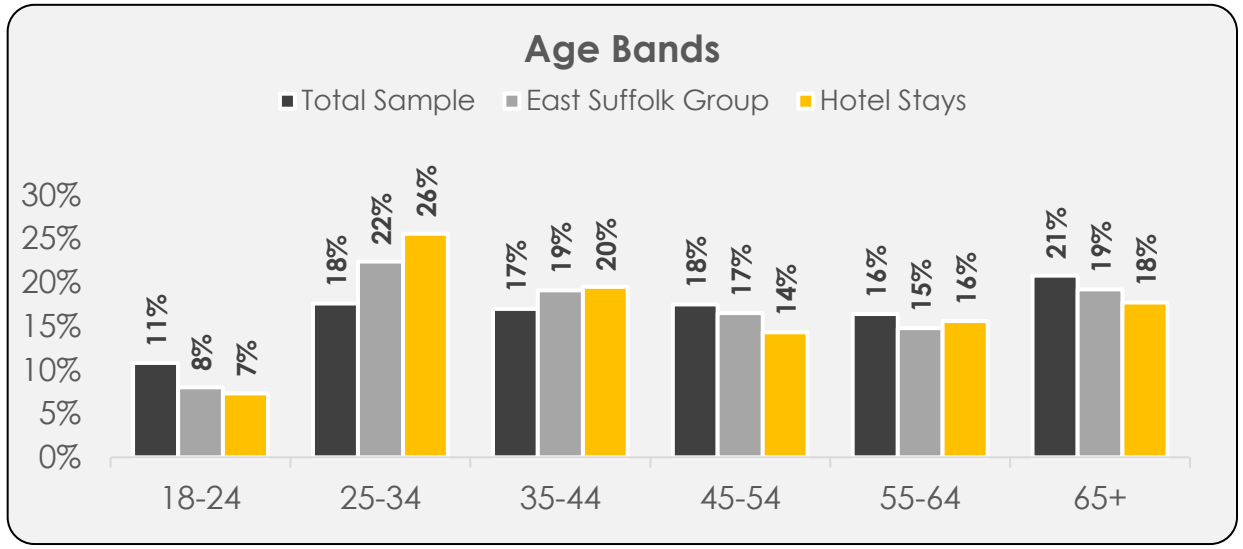
22% of the East Suffolk Segment Group

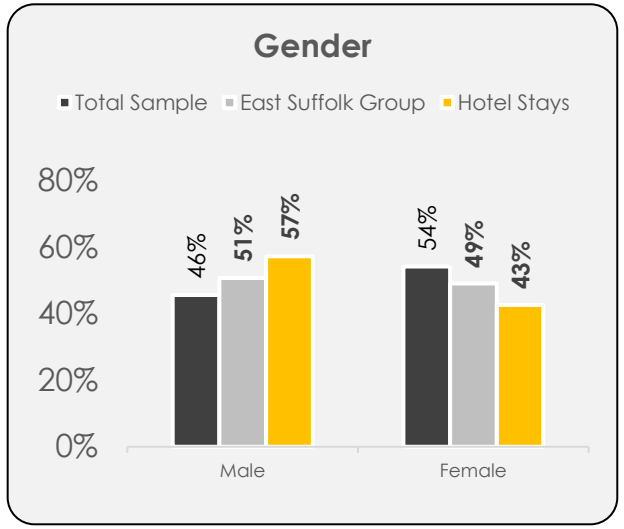
Key message: Major focus – don't lose their booking

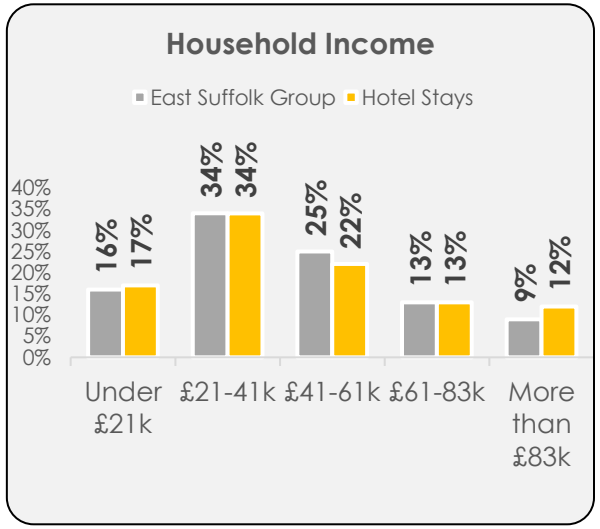
Recommendations and Understanding the Segment

- Younger, male skew and reasonably diverse – not dissimilar to Visitor segments. But come from further afield – over index among Scotland, North West, South West
- Need education/information – don't know as much about the area, but positive expectations – especially around scenery, nature, landscapes, heritage and culture
- Holiday is key reason for trip – eating/drinking out, walks, scenery and history are main anticipated activities
- Need some SZC reassurance – generally positive but concerns about wildlife and traffic

Segment Demographics & Income





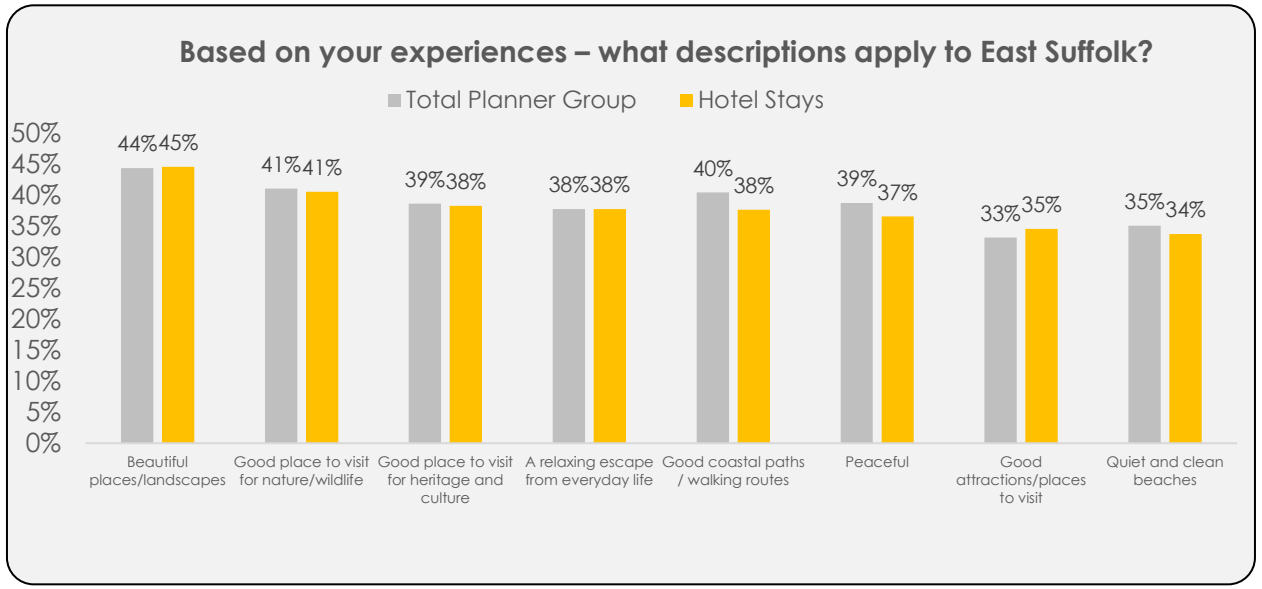


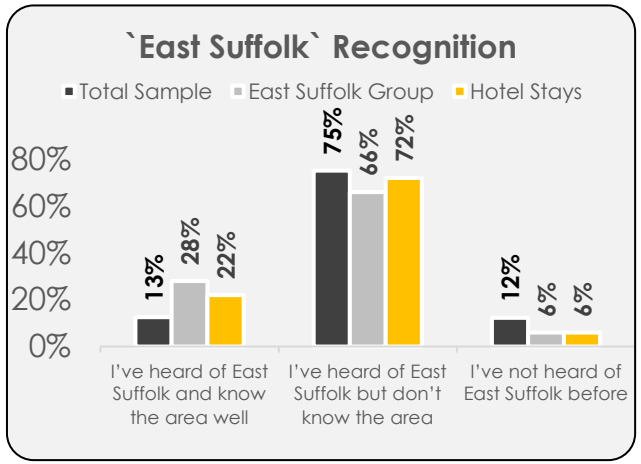
The Hotel Stays segment are marginally overrepresented within the 25-34 age range – though largely align with the average across the East Suffolk Group.

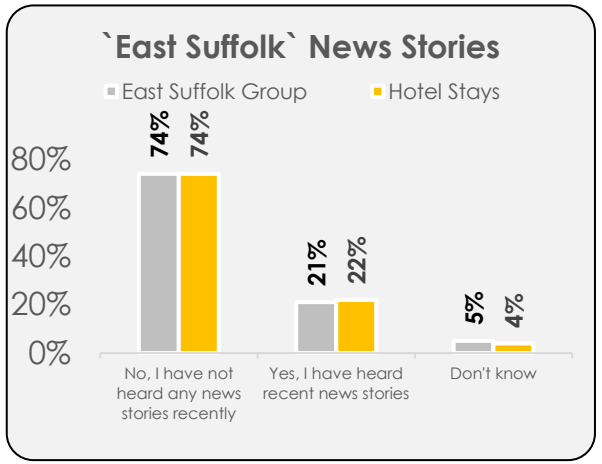
The segment also leans male – and is marginally less white than the East Suffolk Group average.

Income also trends slightly higher than the East Suffolk Group average.

East Suffolk Engagement & Perception



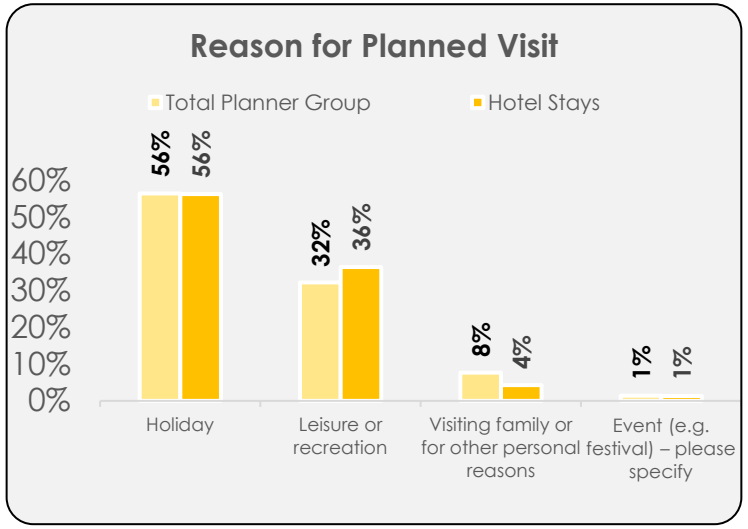


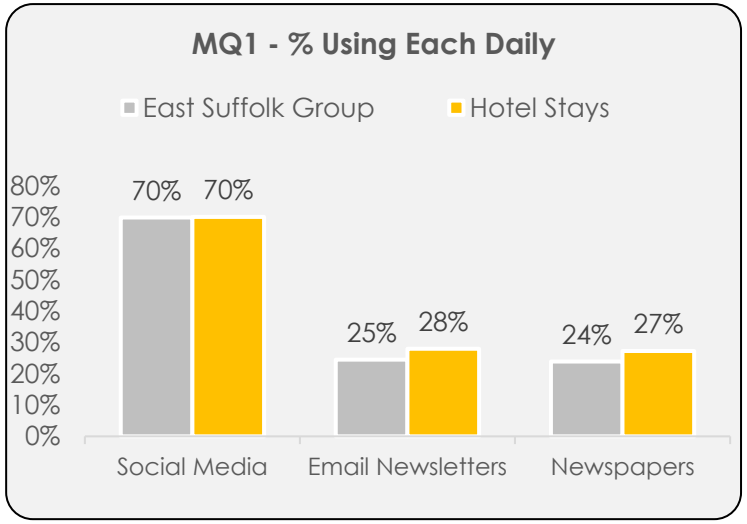


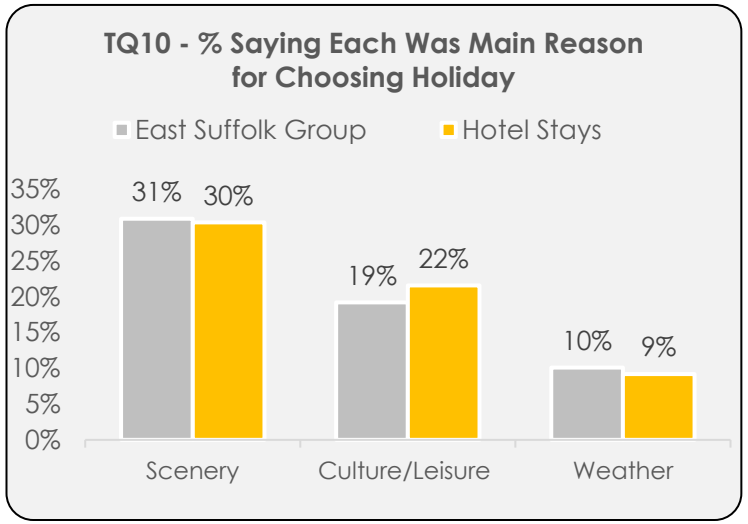
This segment has weaker knowledge and recognition of East Suffolk and of news stories surrounding it.

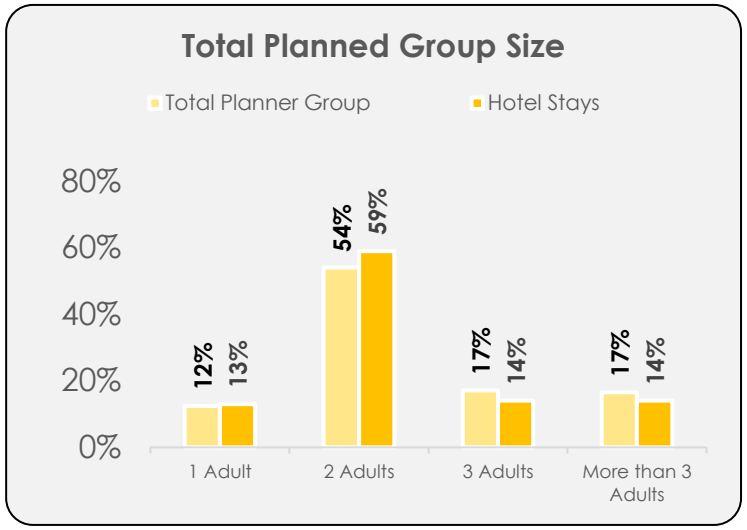
Yet expectations of the region, its natural beauty, heritage and culture, are positive and can be strengthened further if wider engagement and education regarding East Suffolk can be supported.

East Suffolk Visitation and Behaviour









Holidaying is their key reason for trip – eating/drinking out, walks, scenery and history are main anticipated activities and culture/leisure is a strong driver of holiday preferences.

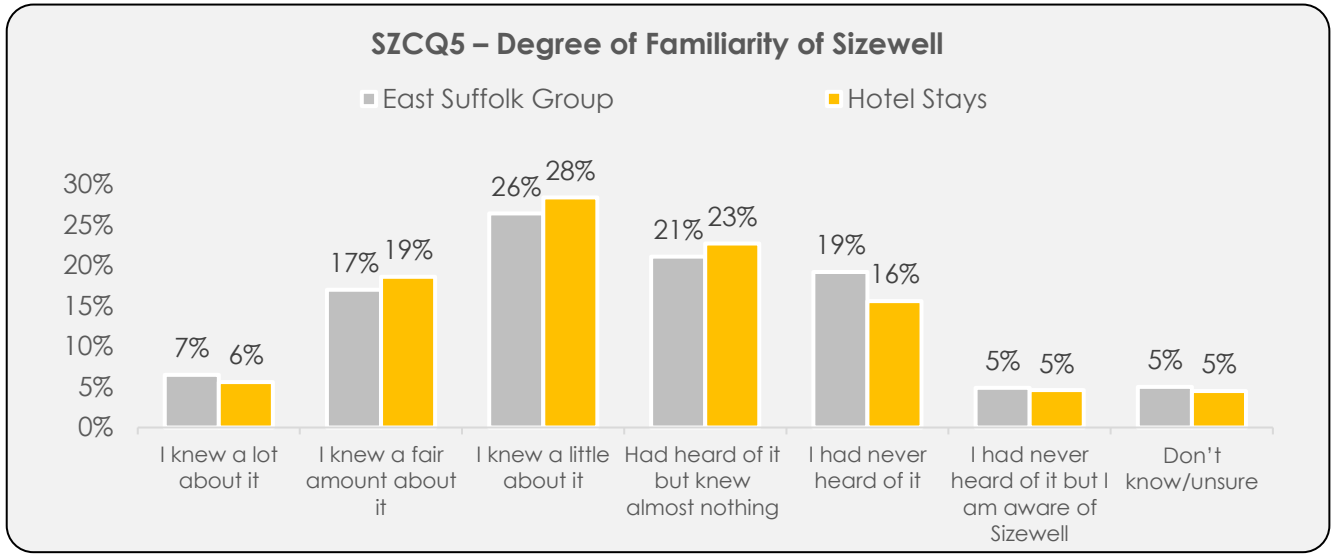
Tend to travel in smaller, couple-based, groups – reflected in accommodation choices being hotels or catered accommodation.

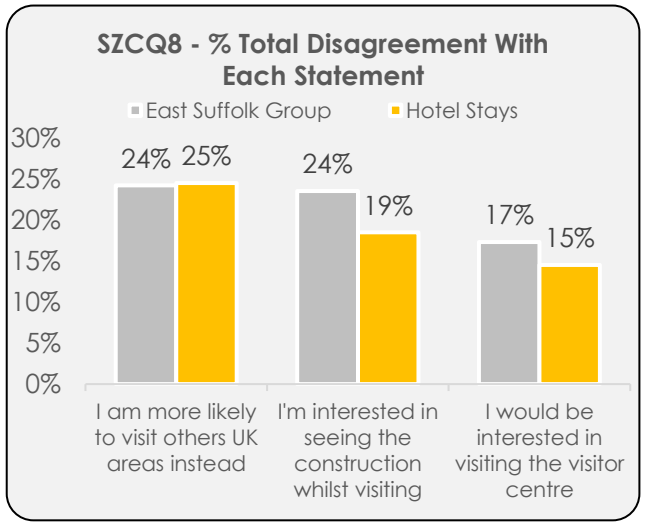
Media engagement is strong – offers and adverts that play into their interests can be a draw.

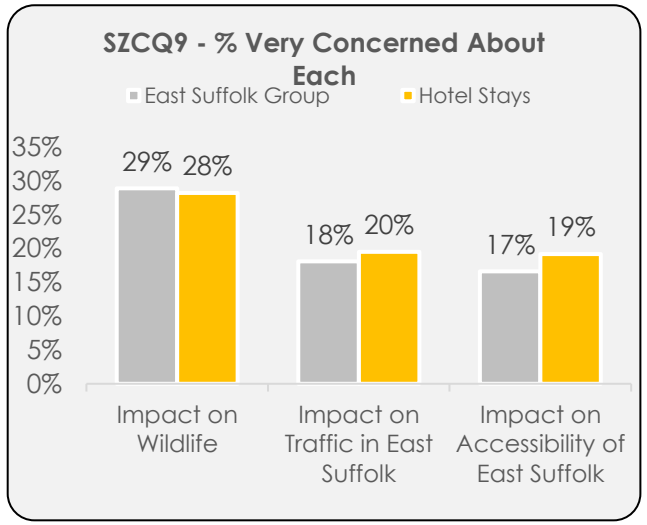
Sizewell C

Sizewell C knowledge is middling to strong – and concerns/visitation impacts are on the lower end.

Yet interest in visiting the site/seeing construction is low and the segment is likely to need reassurance on some issues – including around the impact on wildlife and on broader accessibility to/within the region.









Self-Caterers

Plans for visitation are at self-catered locations – e.g. Airbnb or camping

Segment Analysis

6% of the population

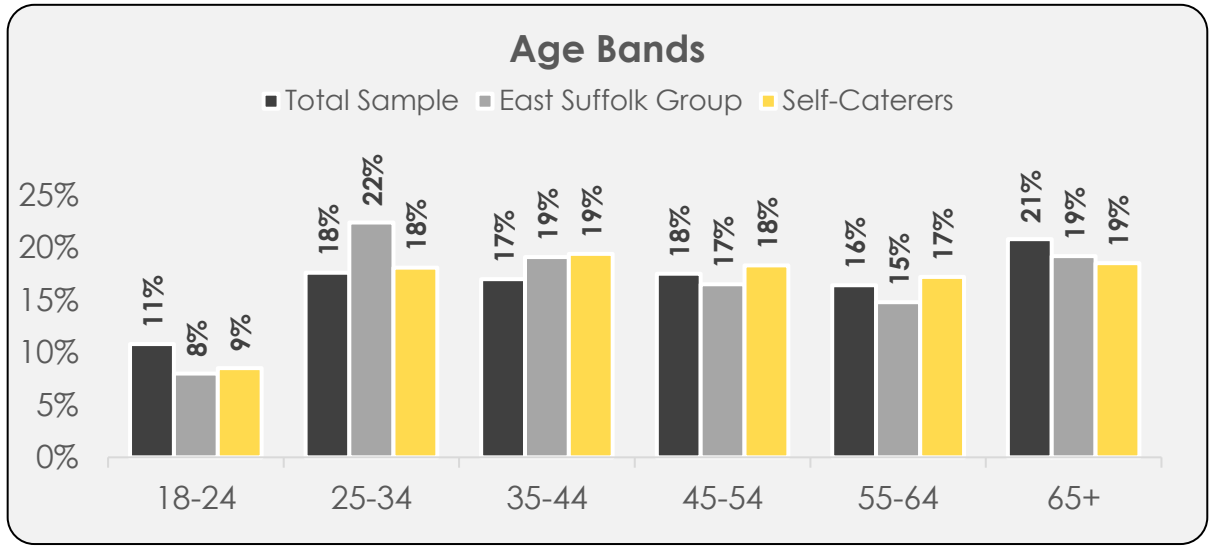
19% of the East Suffolk Segment Group

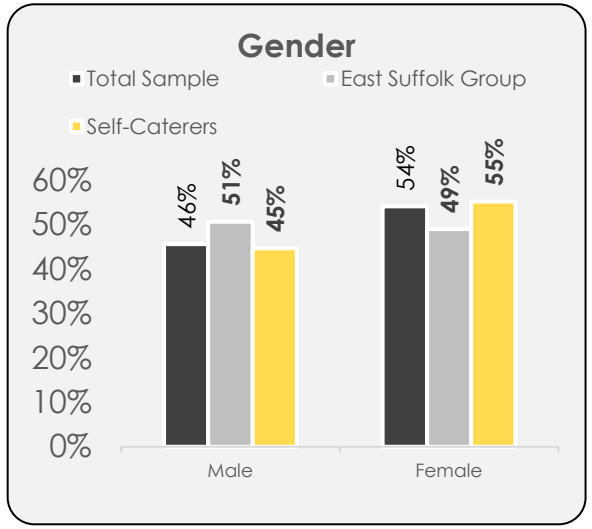
Big focus – looking for a destination for a longer stay in 2026 and need SZC reassurance

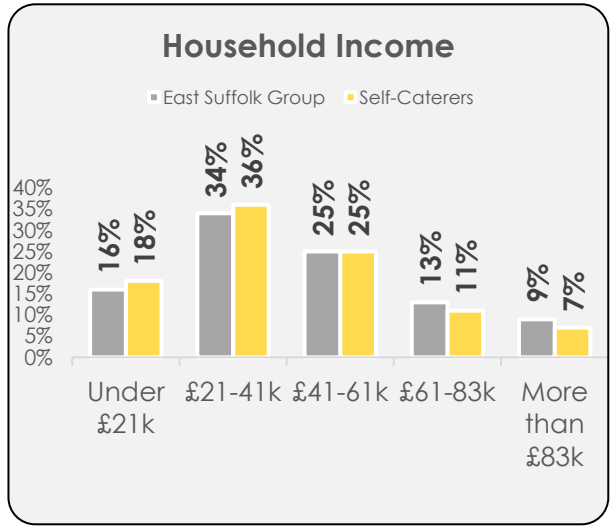
Recommendations and Understanding the Segment

- Some similarities with Hotel Stays – less familiar with the area but appeals for a peaceful, scenic holiday.
- Thinking about a longer stay in 2026 (4/5 nights+) with a larger group – most with children, and some with more than 1 family unit
- Looking for a base camp – Airbnb, cottage accounts for 2/3rds of group, around 1 in 6 will camp
- Activities are heavily nature-oriented
- SZC a turn-off – less pro than other groups (also less likely to have heard of it). Higher than average likelihood that SZC deters visit

Segment Demographics & Income





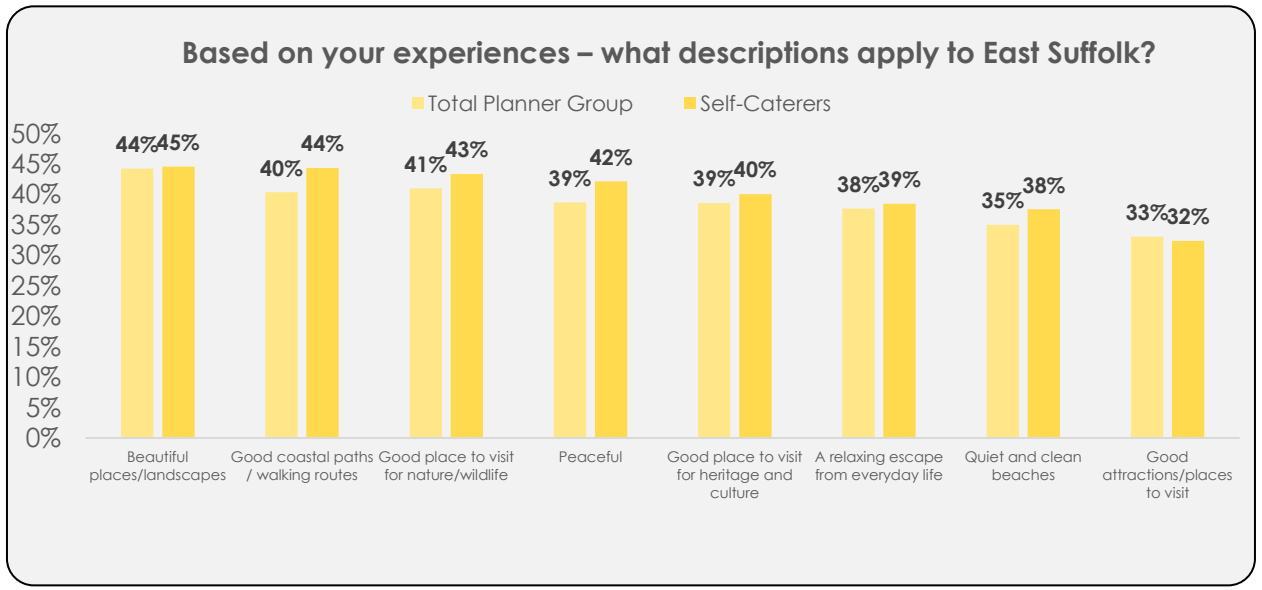


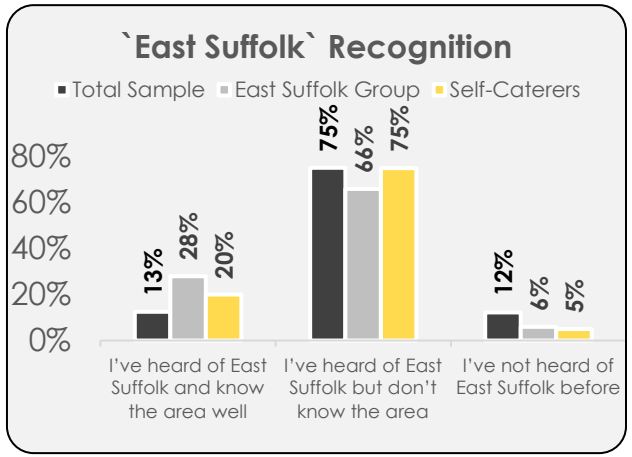
The Self-Caterers segment trend slightly older than other segments across the East Suffolk Group – under indexing amongst 25-34-year-olds.

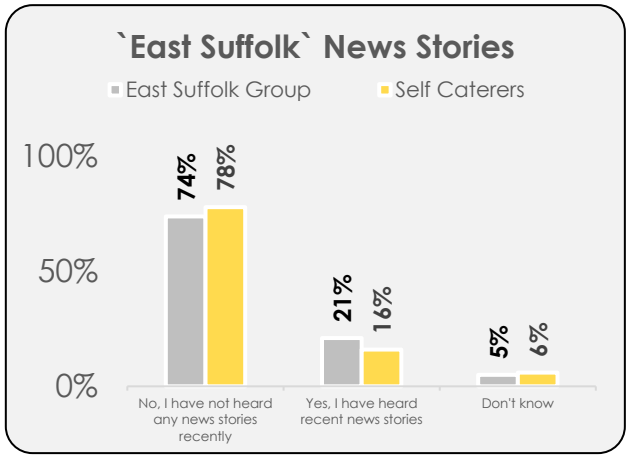
They also over-index as female – above even the full sample average.

The segment is marginally more represented amongst mid-to-lower income groups.

East Suffolk Engagement & Perception



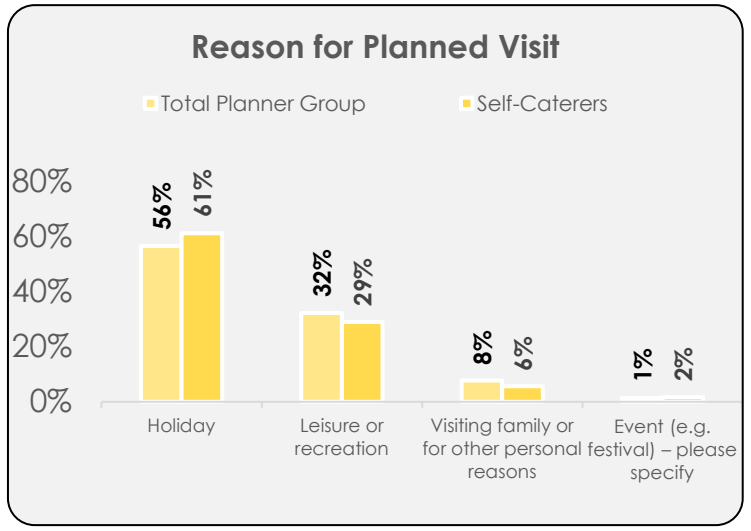


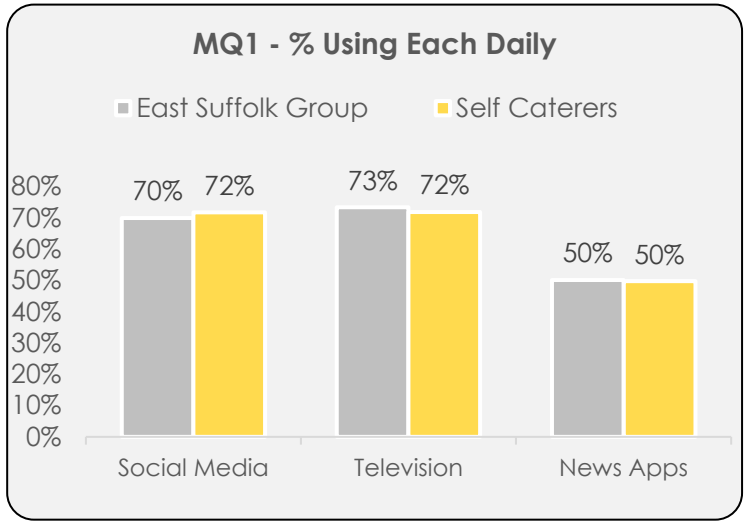


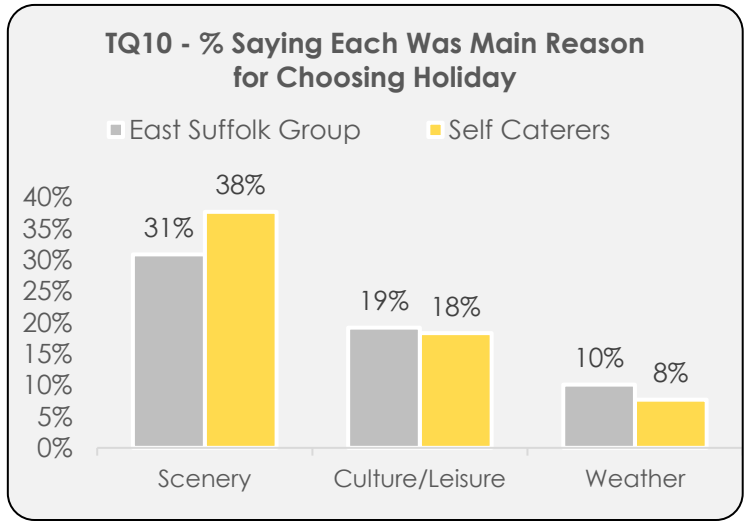
In many ways this segment is similar to the Hotel Stays group – with middling-to-low rates of knowledge and recognition of East Suffolk.

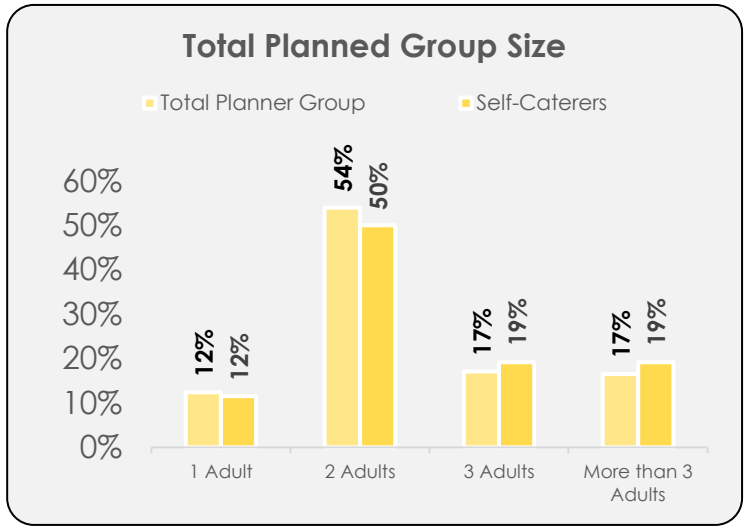
Yet it also shows even stronger associations with natural beauty and other positive descriptors – strengthening these associations can help build stronger links.

East Suffolk Visitation and Behaviour









Segment is looking for a base camp to build a holiday around – Airbnb, cottage accounts for 2/3rds of group, around 1 in 6 plan to camp.

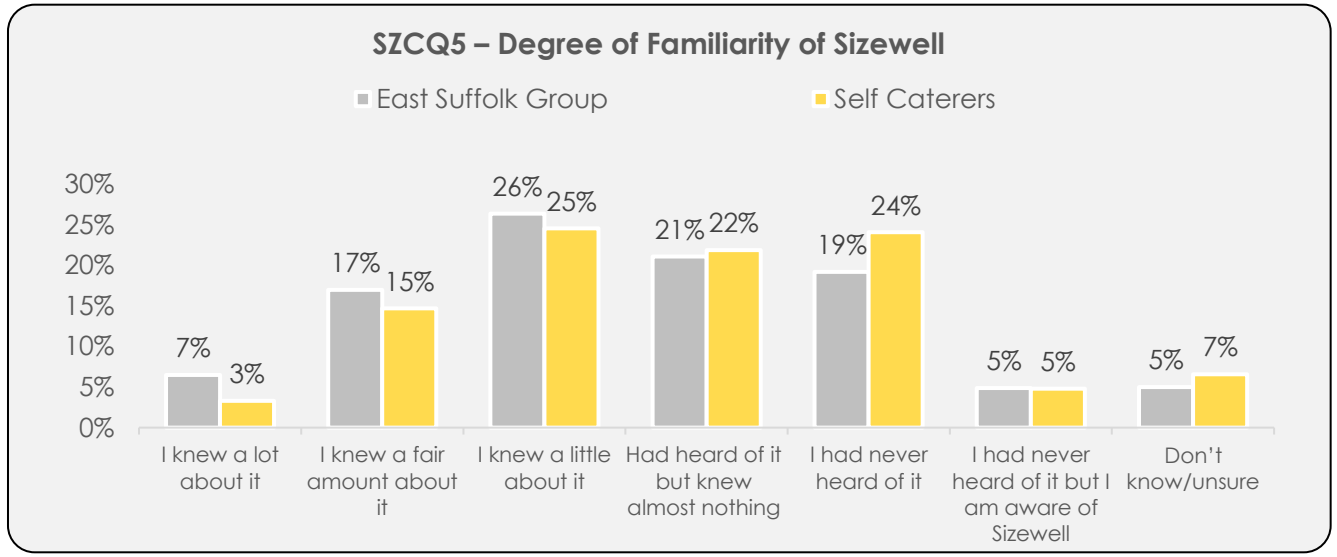
Scenery and culture/leisure are the strongest draws – both for the smaller groups that make up the majority of the segment and for the larger ones that account for around 40% of the segment.

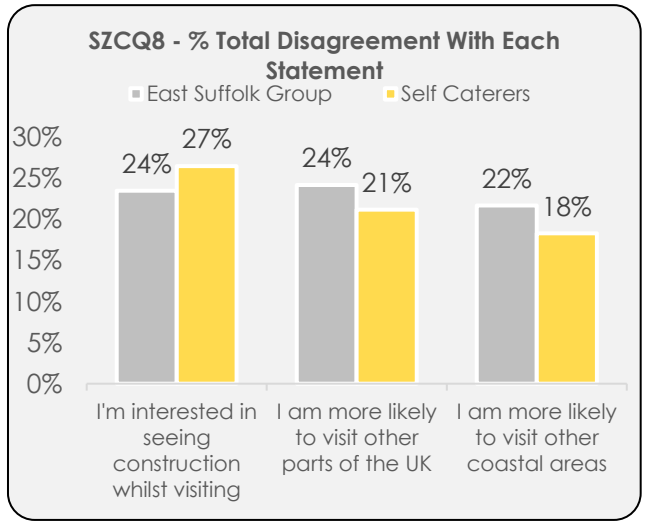
Activities tend to be highly nature oriented – alongside scenery interest this is a key point of attraction.

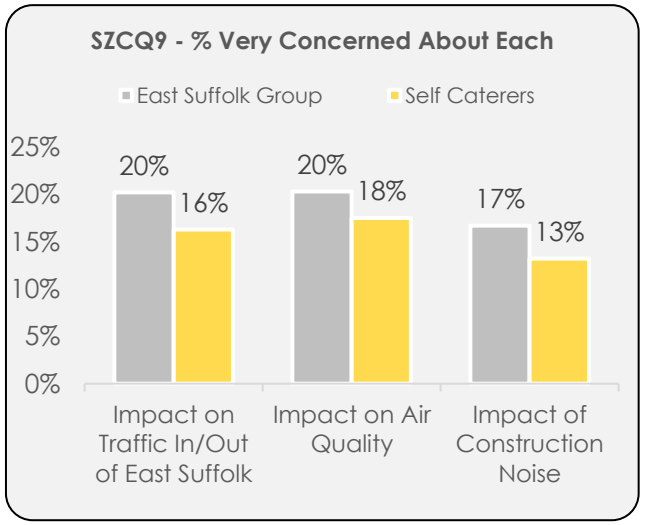
Sizewell C

Sizewell C recognition and knowledge is relatively low – and the segment is generally less pro-Sizewell and pro-nuclear than other segments.

Whilst concerns around impacts are slightly lower, we do see higher rates of agreement with statements around visiting elsewhere during construction.









Relaxation Seekers

Have reasonable knowledge of ES and its towns/villages – associate it with peacefulness, nature, and beauty

Segment Analysis

5% of the population

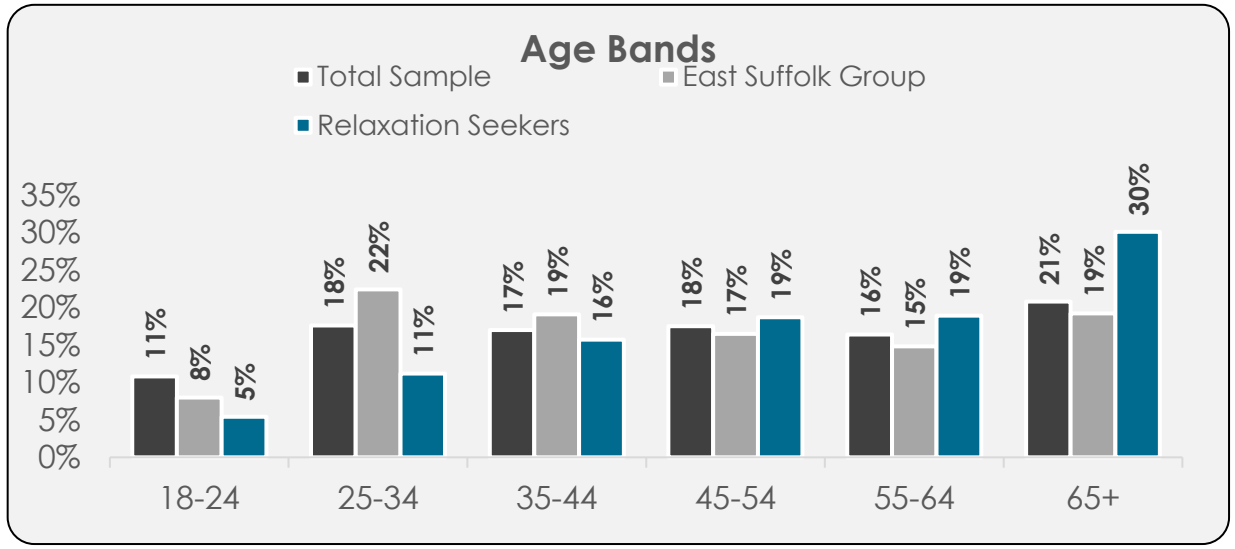
17% of the East Suffolk Segment Group

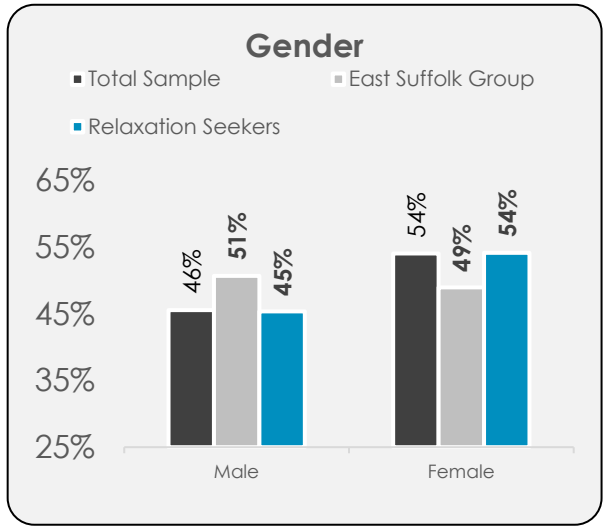
Lower focus – like the idea of the area but distance is high and engagement is low

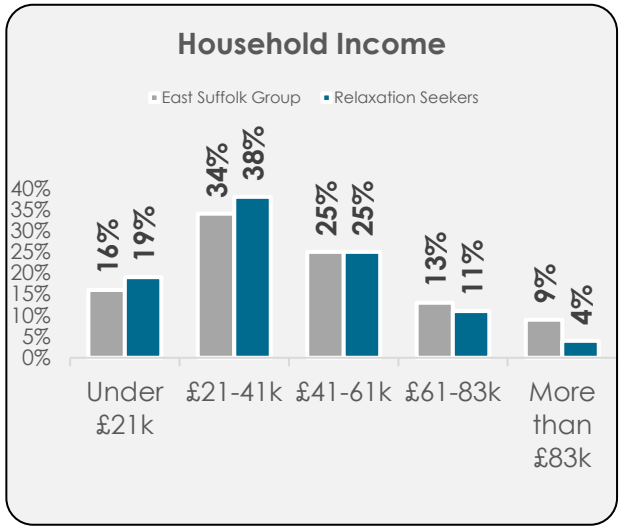
Recommendations and Understanding the Segment

- Less likely to follow through – Much older and less likely to be local. Lower income and savings.
- Not very engaged with ES – don't know the area, haven't seen news stories. But do associate it with scenery and peacefulness
- Unlikely to visit soon – most would think about a trip in 2026 or beyond, and exclusively in the spring/summer
- SZC will deter visits – low interest in seeing construction / visiting the centre, lower levels of positive sentiment generally
- Over-index as a TV audience – social media much less relevant

Segment Demographics & Income





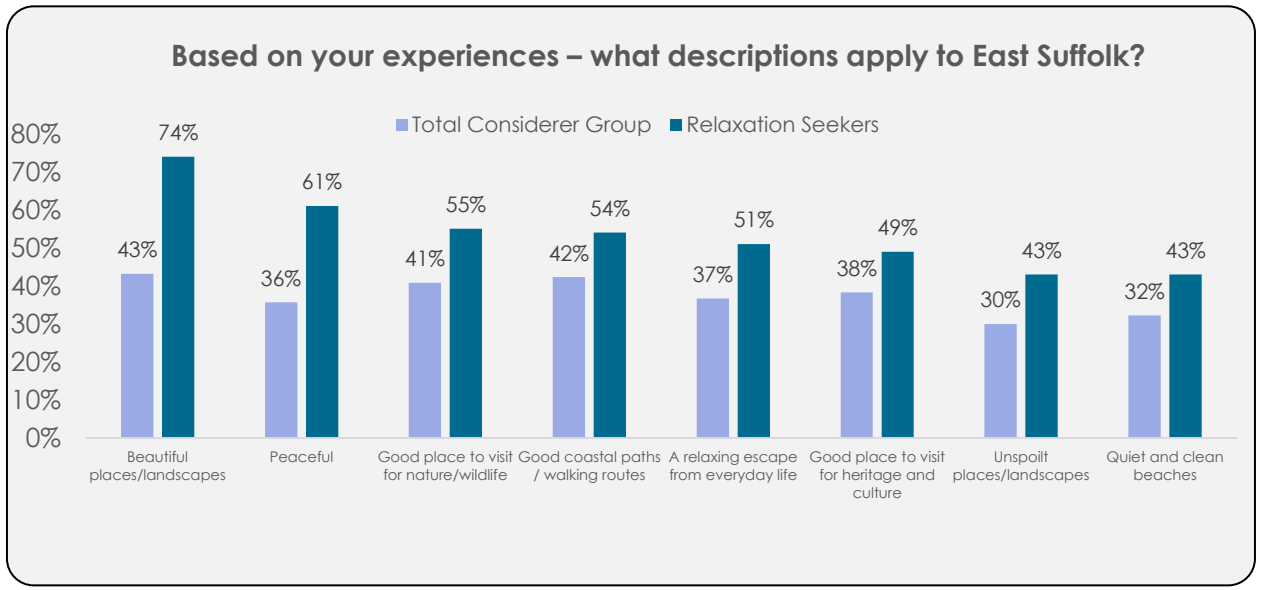


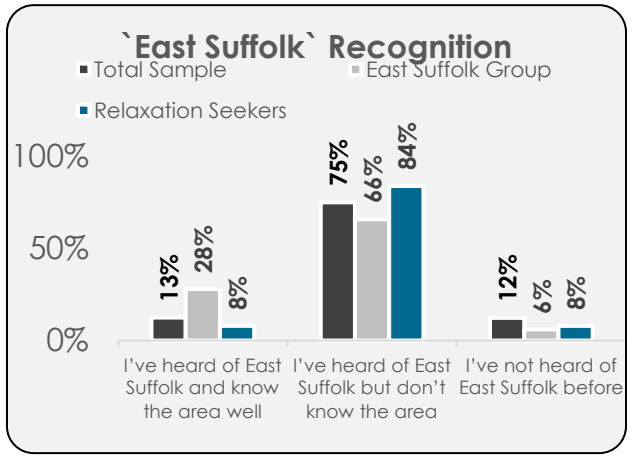
The Relaxation Seekers trend the oldest of all segment – massively over indexing amongst he over-65s.

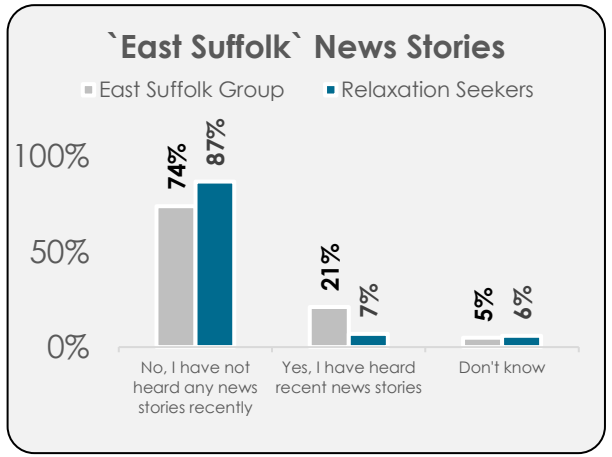
There are also notable trends towards white ethnic backgrounds and the female gender.

Income is lower than average – reflecting higher rates of post-retirement living.

East Suffolk Engagement & Perception





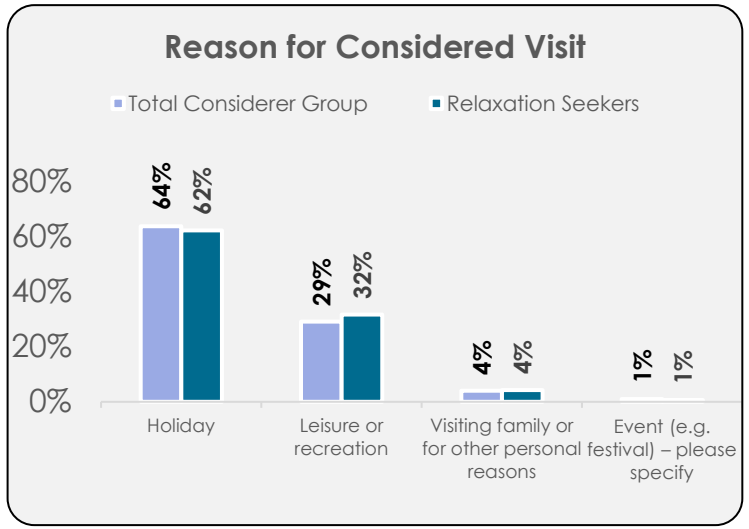


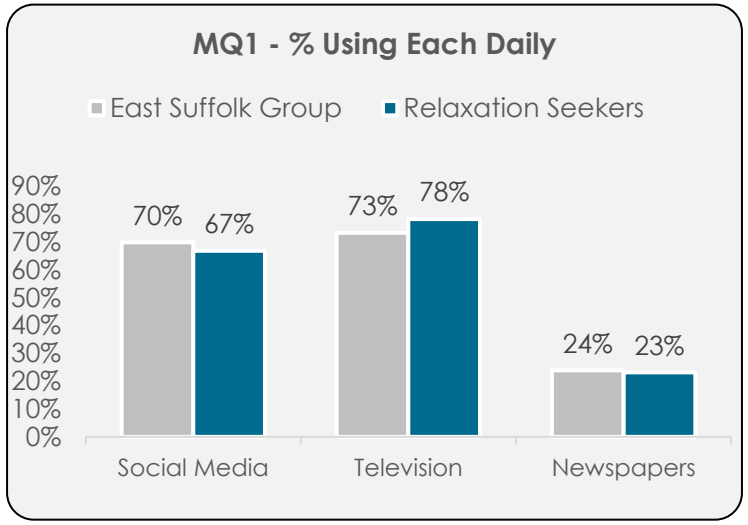
Engagement and knowledge regarding East Suffolk is very weak – there's a real lack of wider understanding of the region.

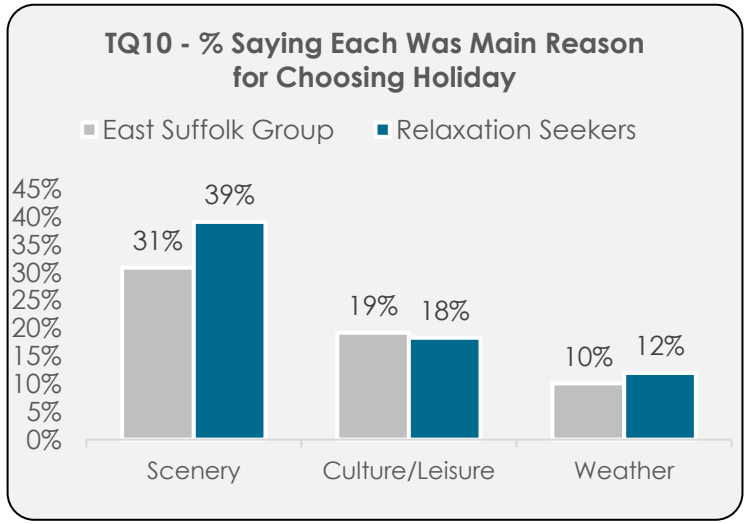
Yet what is there is extremely positive – with very high rates of association with peacefulness and natural beauty.

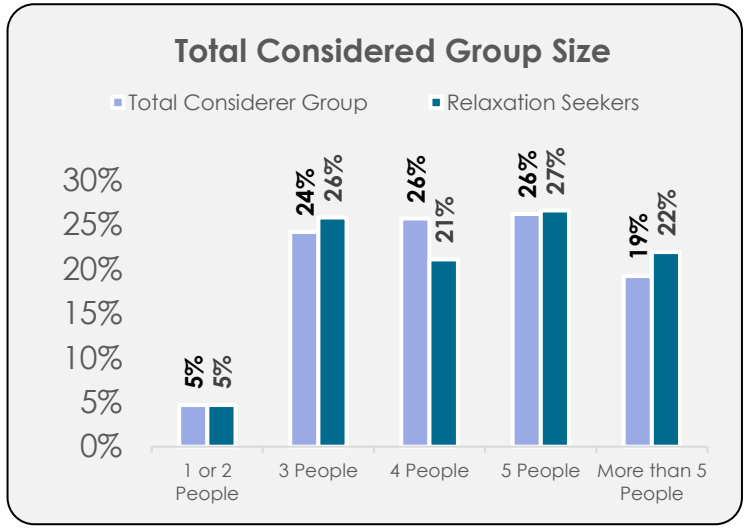
Engaging with the segment around these associations can engender stronger links.

East Suffolk Visitation and Behaviour









Unlikely to visit soon – most would think about a trip in 2026 or beyond, and exclusively in the spring/summer.

Yet their considered visitation tends to be more diverse in its form than other segments – playing into both cultural and natural attractions where knowledge is present.

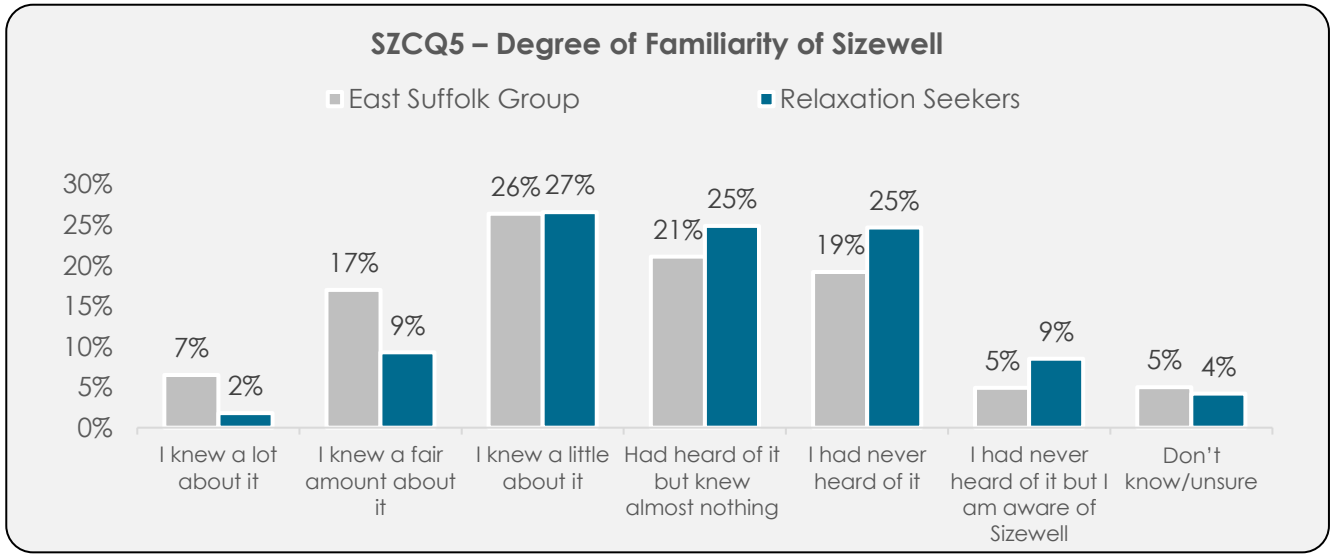
Whilst visiting with children is rare, considered visitation is balanced across both small and large groups – with scenery a strong driver.

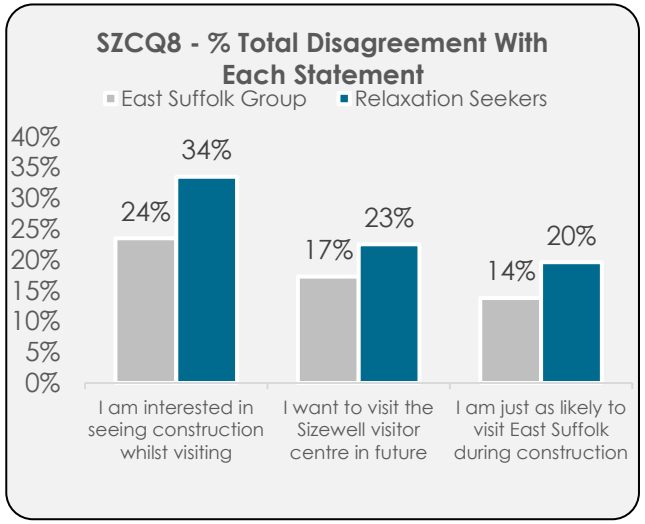
Both traditional and online media are strongly engaged with.

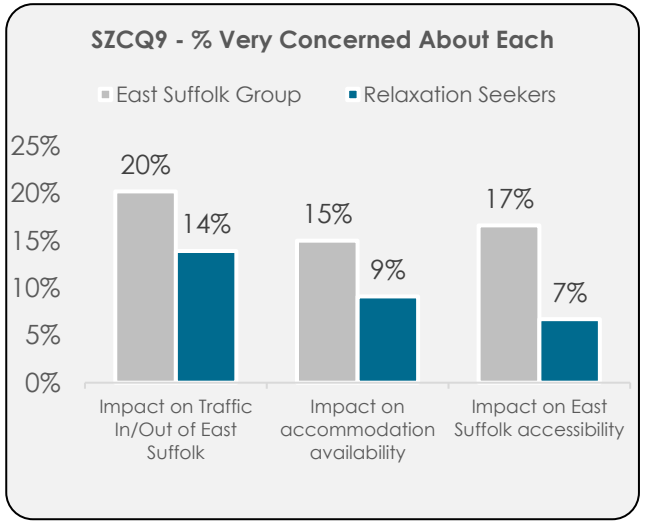
Sizewell C

Knowledge of Sizewell C is low throughout this segment – but where it is present we see strong negative impacts on considered visitation, despite low levels of broader concern over the development.

Increased knowledge of the development amongst the segment would only likely increase the negative impacts on visitation – unless more positive stories can be engaged with.









Casual Considerers

Lower knowledge of ES, fewer associations with peacefulness or scenery, very low recall of towns/villages

Segment Analysis

4% of the population

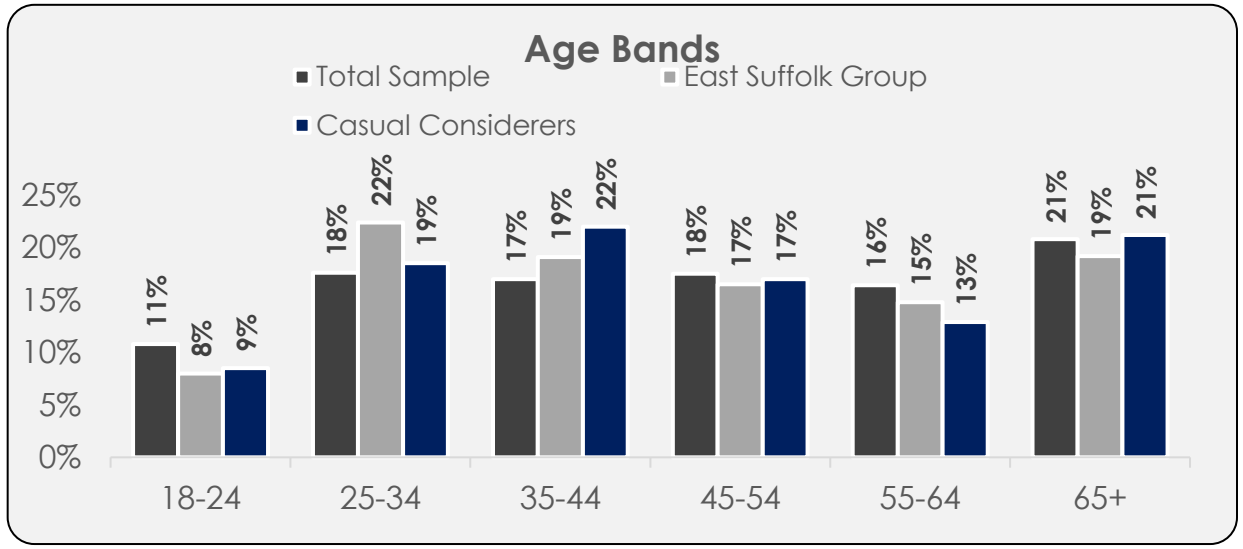
12% of the East Suffolk Segment Group

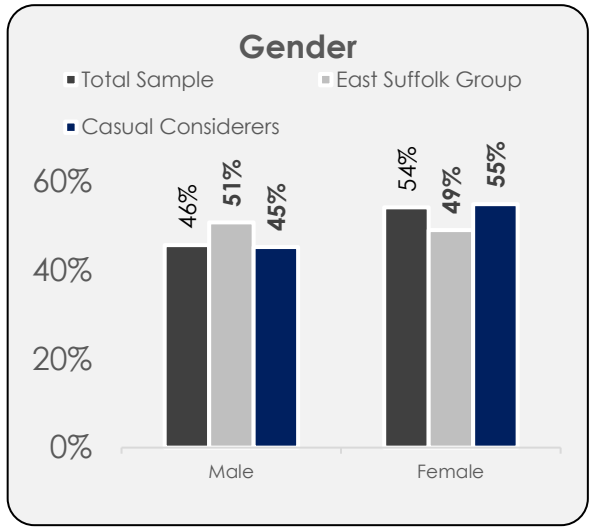
Very low focus – they like the sound of East Suffolk, but are unlikely to visit

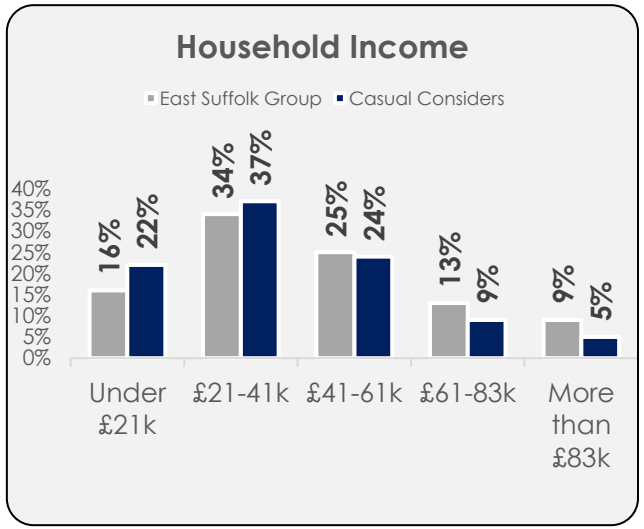
Recommendations and Understanding the Segment

- Long haul - More likely to be distant from ES, only 14% within 2 hours. Relatively low income and savings means shorter journeys more appealing?
- Very low knowledge of area – significantly lower awareness than other segments, many haven't heard of ES at all
- Low enthusiasm for location and little interest in key visitor attractions or activities
- Not negative about SZC but it could be another factor keeping them away

Segment Demographics & Income



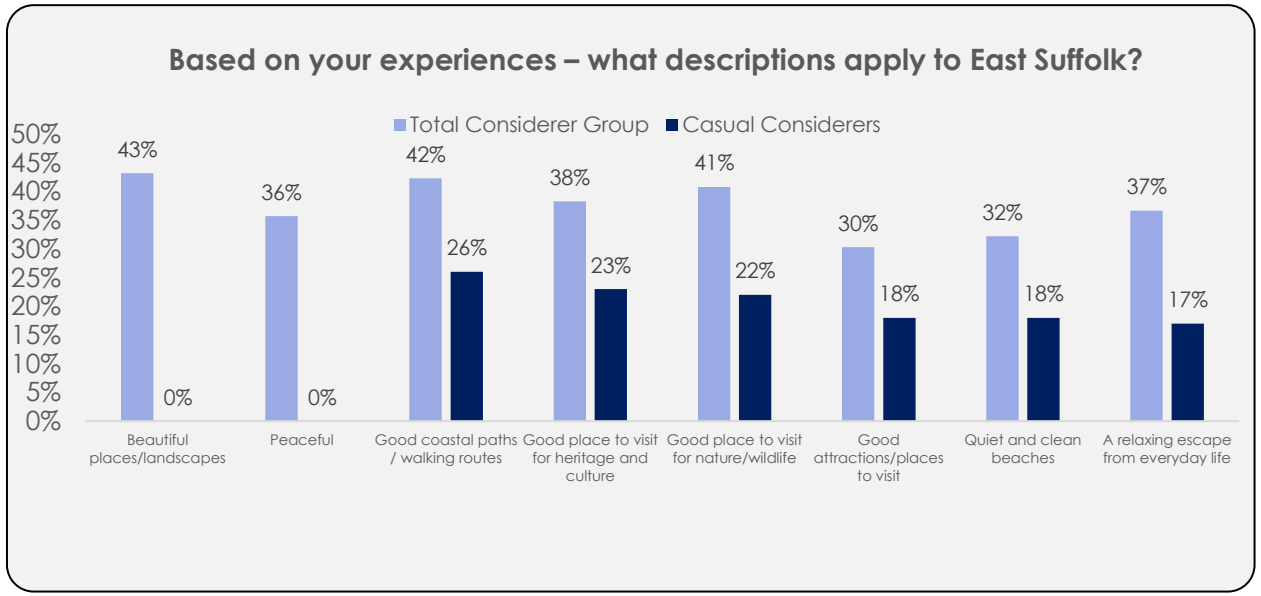


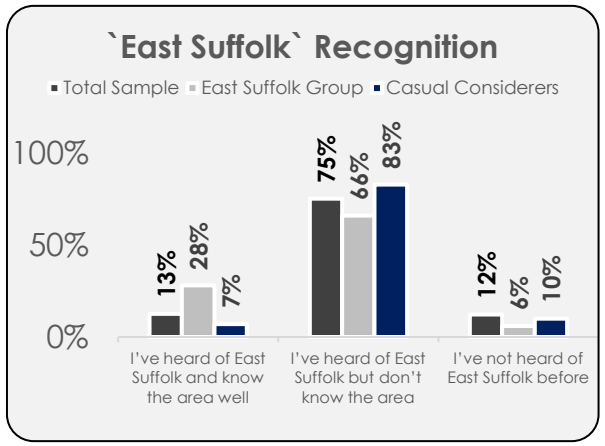


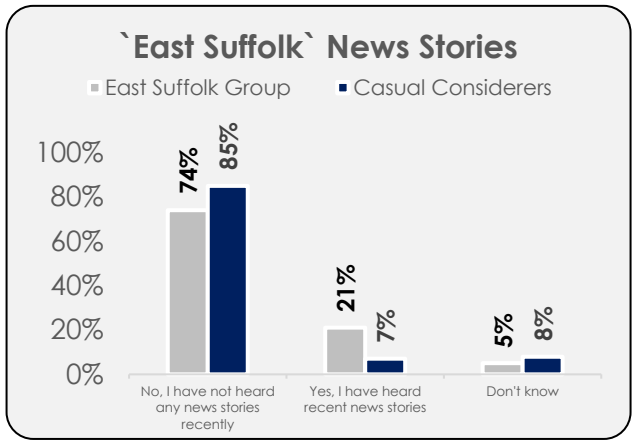
Age is diverse across the Casual Considerers segment – though they slightly under index across the two youngest age groups.

The segment also trends female and is generally more represented amongst lower-to-middle income groups.

East Suffolk Engagement & Perception





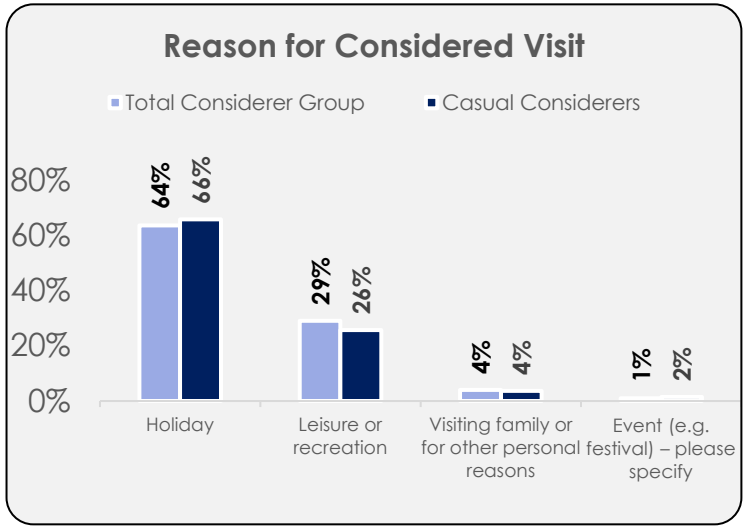


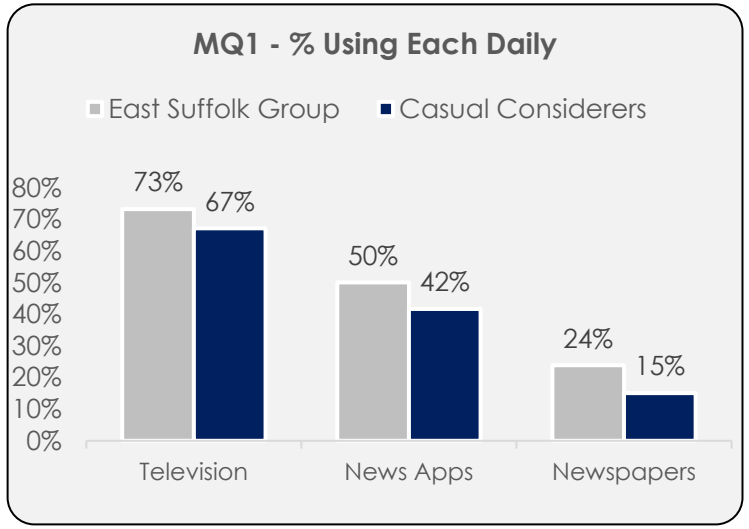
Very low knowledge of area – significantly lower awareness than other segments, many haven't heard of East Suffolk at all

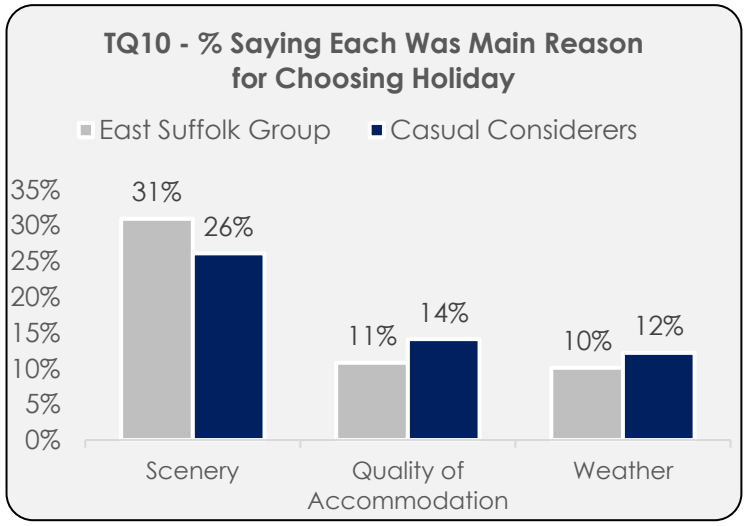
Low enthusiasm for location and little interest in key visitor attractions or activities – this segment is likely to be hard to engage with.

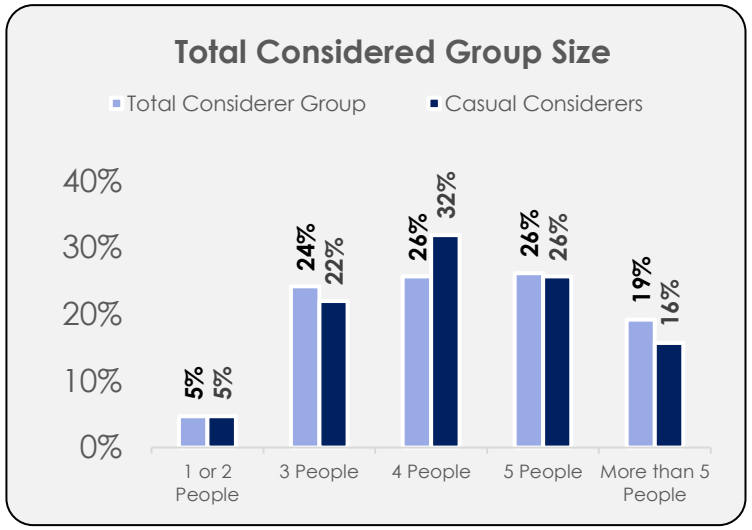
More concerningly still, the segment has non-existent associations around aspects that are strongly represented elsewhere – around natural beauty and peacefulness.

East Suffolk Visitation and Behaviour









Extremely weak knowledge of East Suffolk is reflected in their visitation behaviour – with scenery and cultural activities both less known and garnering less interest.

Price and quality of accommodation are of greater interest than most other segments – whilst group sizes trend towards the middle of the pack.

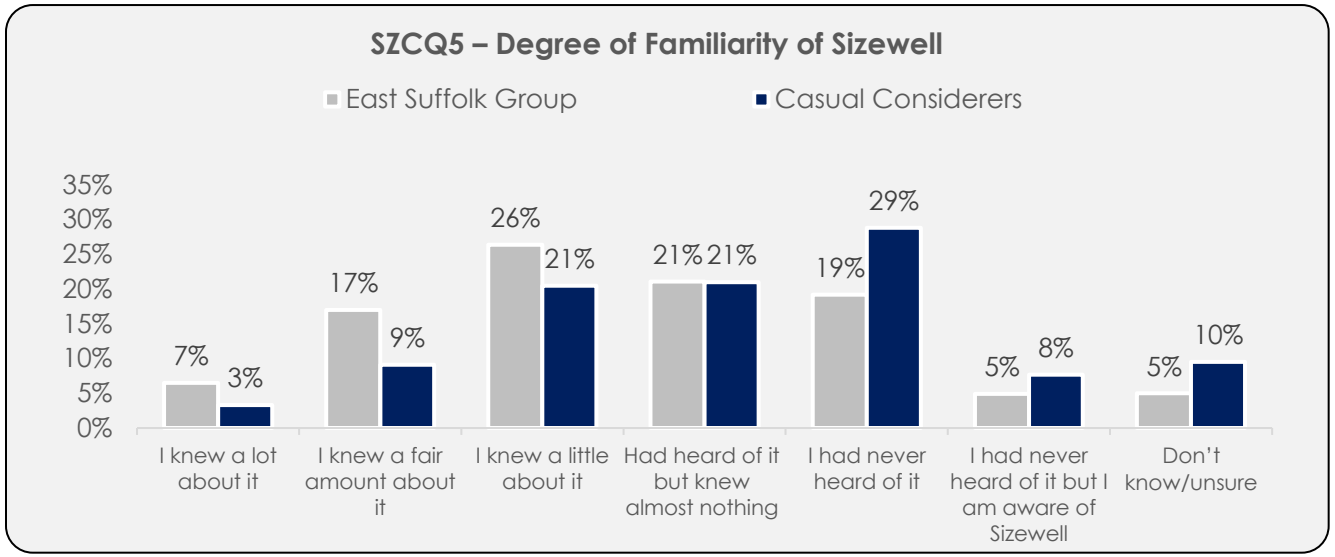
Media engagement is also low – this segment is largely disinterested and hard to reach.

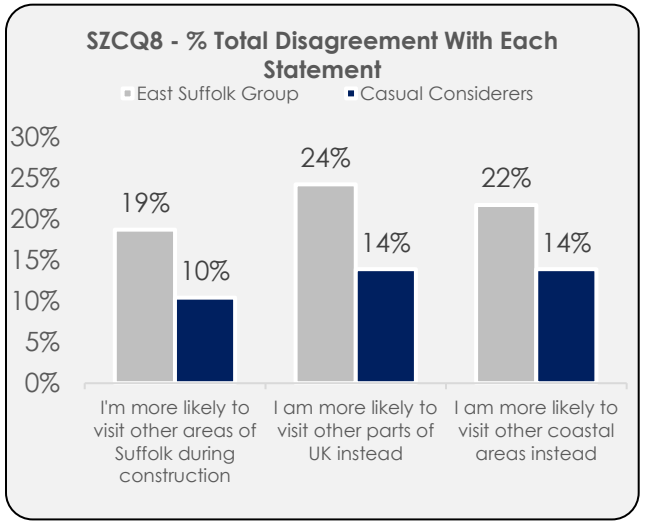
Sizewell C

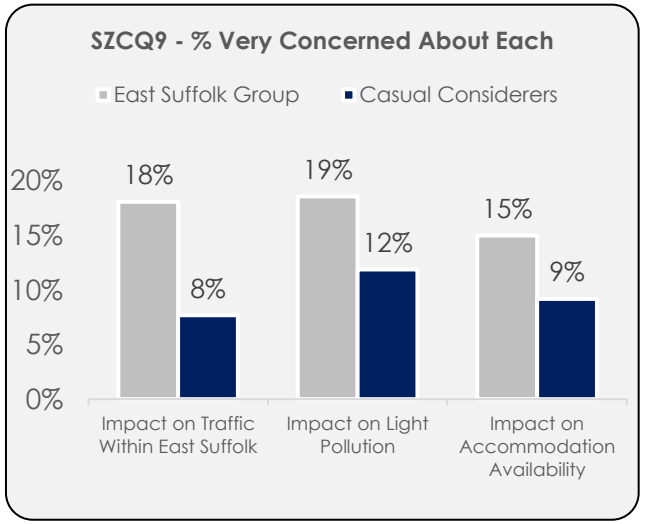
Low knowledge around Sizewell C is reflected in low rates of concern around the development.

Yet that may not tell the full story. We see very high levels of impact on visitation behaviour from the development on the segment.

With interest in the region relatively low, any negative impact is likely to turn this segment off from future visitation.







Key Recommendations

- **East Suffolk Superfans an easy win –** high visit volume, high awareness, high interest – but split on SZC, important to reassure those with concerns
- **One Timers –** all about turning this group into Superfans. Tend to be less engaged with cultural/historical locations… can this be a draw if their awareness is raised?
- **Local Connections –** not worth focusing on in detail, relatively low engagement with tourism and are guaranteed visitors
- **Hotel Stays –** can strengthen by building awareness/recognition and focusing in on more catered/couples accommodation and activities
- **Self-Caterers –** a longer-term stay group with a diverse accommodation preference. Very much activity led and engage heavily with tourist/historical/cultural sites – can engage with them on this.
- **Relaxation Seekers** – all about playing into the relaxation/peacefulness/natural beauty aspect – knowledge is low in other areas but this is a key attraction
- **Casual Considerers –** should not be a key focus, low awareness and interest means they will be hard to engage and secure

What Comes Next?

Other Project Resources

Following this longer segment analysis further project resources will include:

- **Full analysis deck of segments and survey – already provided to ESC team**
- **A brief analysis deck comparing the full non-visitor sample with the East Suffolk Group**
- **A written report incorporating findings from the qualitative stage of the project**
- **Data tables for the survey**

