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PPF 26: REBUTTAL & APPENDICES OF SIMON ELLIOTT

SOCIOECONOMIC IMPACT ASSESSMENT

Table of Contents

Table of Contents	i
1.0 Introduction	1
2.0 Weight in the Planning Balance	2
3.0 Portland Marina Olympic Legacy	5
4.0 Impact on a Circular Economy	7
5.0 Conclusions	8
Appendix SE12: Conformity with EN-1 Section 5.13 on Generic Socioeconomic Impacts	9
Appendix SE13: Extract from ReLondon (June 2022) The Circular Economy at Work	13

1.0 Introduction

1.1 In this rebuttal I consider the following:

- In relation to the Proof of Evidence (PoE, specifically paragraph 8.76) of Felicity Hart, I consider the weight attributable to the socioeconomic benefits of the Proposed Development.
- In relation to the PoE (specifically paragraph 3.11) of Debbie Tulett, I consider the alleged impact of the Proposed Development on the legacy associated with the use of Portland Marina for sailing events during the 2012 Olympics.
- In relation to the PoE (specifically paragraph 5.13) of Paula Klaentschi, I consider the alleged impact of the Proposed Development on job creation in the wider economy.

1.2 I will deal with each of these matters in turn.

1.3 In addition, I note that the Department for Energy Security and Net Zero (DESNZ) have published a revised Overarching National Policy Statement for Energy (EN-1, November 2023) and National Policy Statement for Renewable Energy Infrastructure (EN-3, November 2023). EN-1 paragraph 1.2.1 makes clear that the NPSs may be a material consideration in decision making on applications that fall under the Town and Country Planning Act 1990.

1.4 I do not intend to recast my assessment in the context of this new policy but will refer to them where relevant in chapter 2 when considering the weight attributable to socioeconomic benefits in the planning balance. In addition, as an aide memoire, I have considered the advice set out in section 5.13 of EN-1 on generic socioeconomic impacts in table form at Appendix SE12 at the end of this rebuttal.

2.0 Weight in the Planning Balance

- 2.1 Through Felicity Hart's PoE the Council now contends at paragraph 8.76 that only limited weight can be attributed to the benefits in terms of economic growth and employment. This is a departure from the weight attributed to individual socioeconomic benefits set out by the Council in their supplementary committee report (CD5.2) and set out in my PoE (PPF13, paragraph 1.3.8).
- 2.2 The reason for this fundamental reversal in opinion is unclear.
- 2.3 The Council, through the evidence of Tony Norton, now concludes that the socioeconomic benefits of shore power and district heating are less because, it is suggested, they are less viable than the Council previously understood to be the case. Stephen Othen in his PoE (PPF10) and Rebuttal (PPF25) clearly sets out that this is not the case. In which case, duly corrected, I surmise the Council would revert to their previous assessment of materiality:
- Shore power receives 'full' weight, which I compare to substantial weight and therefore agree with.
 - District heating receives moderate weight, which I agree with.
- 2.4 In terms of direct employment from the Proposed Development, the Council now suggests that this should not receive moderate weight seemingly because a similar level of employment could be expected if the ERF were constructed elsewhere.
- 2.5 I do not dispute this obvious statement but question its relevance in the planning balance of this appeal. There is no suggestion that the Proposed Development should be determined on any other basis than its own merits. Whether a similar (and theoretical) scheme, on another site, might occur in the future has no relevance to the level of weight that can be attributed to the employment generated by the Proposed Development. This was not highlighted by the Council in the committee report (CD5.1) or supplement (CD5.2) where it was concluded that it should attract moderate weight and I do not see any evidence or circumstance that would justify a change.
- 2.6 No reference is made to the socioeconomic benefits arising from improved energy security, which the Council attributed moderate weight in CD5.2. Notwithstanding my view that this should be given greater weight (PPF13, paragraph 9.1.2), I cannot reconcile how the overall benefit the Council now attributes to all socioeconomic effects is limited if the energy security continues to attract moderate weight.
- 2.7 EN-1 reinforces my position that energy security must attract substantial weight, for example:

“2.3.1 *Energy underpins almost every aspect of our way of life. It enables us to heat and light our homes; to manufacture goods; to produce and transport food; and to travel to work and for leisure. Our businesses and jobs rely on the use of energy. Energy is essential for the critical services we rely on – from hospitals to traffic lights and mobile devices. It is difficult to overestimate the extent to which our quality of life is dependent on adequate energy supplies.*”

2.8 In addition (emphasis original):

“3.2.6 *The Secretary of State should assess all applications for development consent for the types of infrastructure covered by this NPS on the basis that the government has demonstrated that there is a need for those types of infrastructure which is urgent, as described for each of them in this Part.*

3.2.7 *In addition, the Secretary of State has determined that substantial weight should be given to this need when considering applications for development consent under the Planning Act 2008.*

3.2.8 *The Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS.*”

2.9 And:

“3.3.58 *Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.*”

2.10 Finally:

“3.3.63 *Subject to any legal requirements, the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy. Government strongly supports the delivery of CNP Infrastructure and it should be progressed as quickly as possible.*”

2.11 CNP refers to Critical National Priority, EN-1 paragraph 4.2.5 confirms that an ERF is CNP Infrastructure.

- 2.12 Consequently, I see no substance in the Council's conclusion that the accepted socioeconomic benefits of the Proposed Development should be given considerably less weight in the planning balance compared to what the same planning officer for the Council reported to their committee in recommending refusal of the planning application.

3.0 Portland Marina Olympic Legacy

- 3.1 The PoE of Debbie Tulett asserts, without any evidence¹, that the Proposed Development would harm the legacy associated with the use of Portland Marina for sailing events during the 2012 Olympics some 11 years ago.
- 3.2 I first note that the PoE does not refer to any comments made by the sailing clubs based at Portland Marina and that I have not been able to find any consultation response from these sailing clubs. It is unclear therefore on whose behalf this PoE makes this assertion.
- 3.3 Notwithstanding this, I have considered objectively whether it might be possible for the Proposed Development to lead to socioeconomic harm specifically in relation to sailing events occurring out of the marina.
- 3.4 Most marinas are associated with areas with a long tradition of sailing for trade and Portland is no exception. Therefore, most marinas lie close to or within commercial ports that are typically industrial in nature and again Portland is no exception.
- 3.5 While users of the marina undoubtedly appreciate the setting provided by Chesil Beach and the Jurassic Coast, the marina will have been chosen simply by virtue of distance from home, the desire to be involved in the racing events that take place or the qualities of the bay itself as it is protected by the headland from the southwest. None of these factors will be materially affected by the Proposed Development and indeed, in landscape and visual terms, Jon Mason in his PoE (PPF4) confirms that neither Chesil Beach nor the Jurassic Coast will be materially harmed by the Proposed Development.
- 3.6 In terms of the legacy itself, this was to build on the area's existing reputation as a world-class sailing venue by bringing new business investment and infrastructure to the Osprey Quay area. This physical legacy of the Olympics cannot be undone by the Proposed Development, and I cannot see how the resulting business investment that has occurred over the last 11 years could be harmed. The Proposed Development will in no way change the value of the area as a sailing

¹ EN-1 paragraph 5.12.10 states that *“the Secretary of State 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).”*

venue, particularly competitive sailing which ultimately is entirely focused on the prevailing sea and weather conditions, neither of which could be influenced by the Proposed Development.

- 3.7 Consequently, I do not consider there to be any socioeconomic harm to Portland Marina or its Olympic legacy.

4.0 Impact on a Circular Economy

- 4.1 The PoE of Paula Klaentshi refers to the 2022 report by ReLondon on the circular economy, I have included the relevant extract in my Appendix SE13 attached at the end of this rebuttal. Specifically, the PoE quotes from page 25 of the report, *“preventing 10,000 tonnes of waste means one job is lost in waste incineration compared to 386 jobs created in prevention and redistribution sectors³⁹”*.
- 4.2 This statement is accompanied by endnote 39, which states that *“for more information on the detailed analysis behind these scenarios please contact ReLondon”*. Unfortunately, this analysis was not available for me to consider at the time of writing this rebuttal. Notwithstanding this, it is clear that this reference has been misconstrued.
- 4.3 When the paragraph is read as a whole, it is very clear that ReLondon are suggesting that preventing waste from being created in the first place through renting, sharing and re-use, could offer more job opportunities than waste incineration. I do not dispute this.
- 4.4 What I must dispute however is the assertion that an ERF, or presumably any other form of waste disposal including recycling, would *“imperil”* job creation that might occur if that waste wasn’t created in the first place as the PoE suggests. It is not the purpose of the ERF to create waste to justify its existence but instead provide an alternative to landfill with the considerable added benefits of power generation. Further, Nick Roberts in his Rebuttal deals with the possibly associated issue that in some way an ERF might hinder improvements in recycling.
- 4.5 Consequently, I cannot see any substance to this assertion.

5.0 Conclusions

- 5.1 I have dealt with three matters in this rebuttal for the purposes of clarification and accuracy. More broadly, I have read all PoEs produced by the Council and Rule 6 Party, and I see no justification to change my position of the substantial socioeconomic benefit of the Proposed Development, as set out in my PoE (PPF13).

APPENDIX SE12: CONFORMITY WITH EN-1 SECTION 5.13 ON GENERIC SOCIOECONOMIC IMPACTS

General note: EN-1 deals specifically with nationally significant infrastructure projects (NSIPs). The Proposed Development does not meet the threshold to be considered a NSIP and therefore, simply due to its scale, some of the areas of assessment suggested in the text are not relevant in this instance.

EN-1 States:	Response
5.13.1 The construction, operation and decommissioning of energy infrastructure may have socio-economic impacts at local and regional levels. Parts 2 and 3 of this NPS set out some of the national level socio-economic impacts.	No comment
Applicant assessment	
5.13.2 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 ES (see Section 4.3).	This was undertaken, CD1.36g.
5.13.3 The applicant is strongly encouraged to engage with relevant local authorities during early stages of project development so that the applicant can gain a better understanding of local or regional issues and opportunities.	See ES more widely, including scoping opinion etc.
5.13.4 The applicant's assessment should consider all relevant socio-economic impacts, which may include: <ul style="list-style-type: none"> • the creation of jobs and training opportunities. Applicants may wish to provide information on the sustainability of the jobs created, including where they will help to develop the skills needed for the UK's transition to Net Zero • the contribution to the development of low-carbon industries at the local and regional level as well as nationally • the provision of additional local services and improvements to local infrastructure, including the provision of educational and visitor facilities • any indirect beneficial impacts for the region hosting the infrastructure, in particular in relation to use of local support services and supply chains • effects (positive and negative) on tourism and other users of the area impacted • the impact of a changing influx of workers during the different construction, operation and decommissioning phases of the energy infrastructure. This could change the local population dynamics and could alter the demand for services and facilities in the settlements 	Set out in my PoE (PPF13), chapter 6. This has not been set out in detail, although my PoE does recognise the levels of occupation the Proposed Development is likely to employ. Details of education and visitor provision are considered in CD1.37i, section 1.5.2.4. Indirect effects are considered using economic multipliers in most sections of my PoE. Tourism is central to my PoE, see chapter 5. Given the scale of the Proposed Development, this is not considered to be a significant issue, particularly given the desire to use the local construction workforce wherever possible. Any

EN-1 States:	Response
<p>nearest to the construction work (including community facilities and physical infrastructure such as energy, water, transport and waste). There could also be effects on social cohesion depending on how populations and service provision change as a result of the development</p> <ul style="list-style-type: none"> • cumulative effects - if development consent were to be granted to for a number of projects within a region and these were developed in a similar timeframe, there could be some short-term negative effects, for example a potential shortage of construction workers to meet the needs of other industries and major projects within the region 	<p>specialist contractors from outside of Dorset will be able to book accommodation in the many hotels etc. in the area.</p> <p>No significant cumulative effects are considered likely during construction given the scale of the Proposed Development.</p>
<p>5.13.5 Applicants should describe the existing socio-economic conditions in the areas surrounding the proposed development and should also refer to how the development’s socio-economic impacts correlate with local planning policies.</p>	<p>See my PoE, chapter 2 for relevant policies and strategies and chapter 3 for an overview of the local economy.</p>
<p>5.13.6 Socio-economic impacts may be linked to other impacts, for example visual impacts considered in Section 5.10 but may also have an impact on tourism and local businesses. Applicants are encouraged, where possible, to demonstrate that local suppliers have been considered in any supply chain.</p>	<p>My PoE cross-refers to other disciplines, such as landscape, as necessary.</p> <p>Given the scale of the Proposed Development, a detailed analysis of local suppliers has not been undertaken yet as it is highly unlikely to influence the significance of socioeconomic effect.</p>
<p>5.13.7 Applicants should consider developing accommodation strategies where appropriate, especially during construction and decommissioning phases, that would include the need to provide temporary accommodation for construction workers if required.</p>	<p>As referred to above, it is unlikely that the demand for temporary accommodation will be significant given the scale of the Proposed Development.</p>
<p>Mitigation</p>	
<p>5.13.8 The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development. For example, high quality design can improve the visual and environmental experience for visitors and the local community alike.</p>	<p>No significant or material adverse socioeconomic impacts have been identified.</p>
<p>Secretary of State decision making</p>	
<p>5.13.9 The Secretary of State should have regard to the potential socio-economic impacts of new energy infrastructure identified by the applicant and from any other</p>	<p>No comment.</p>

EN-1 States:	Response
sources that the Secretary of State considers to be both relevant and important to its decision.	
5.13.10 The Secretary of State 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).	No comment.
5.13.11 The Secretary of State should consider any relevant positive provisions the applicant has made or is proposing to make to mitigate impacts (for example through planning obligations) and any legacy benefits that may arise as well as any options for phasing development in relation to the socio-economic impacts.	No comment.
5.13.12 The Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.	This is already included in the s106 heads of terms.

APPENDIX SE13: EXTRACT FROM RELONDON (JUNE 2022) THE CIRCULAR ECONOMY AT WORK

Full document can be found at: https://ek45a9hw9ht.exactdn.com/wp-content/uploads/2022/06/The-circular-economy-at-work_jobs-and-skills-for-Londons-low-carbon-future.pdf

6. Circular transition scenario for London by 2030

The Mayor of London has set targets for London to be a zero carbon city by 2030 and three-quarters of London's boroughs have set targets to reach net zero by 2030.³⁷

London's Green New Deal aims to support the creation of tens of thousands of jobs through doubling the size of the city's green economy by 2030. In this section of the report, a circular transition scenario has been developed to estimate the number of jobs there could be in a more circular London by 2030.

6.1 Methodology and assumptions behind the scenario

For the purposes of this report, net job creation means gross jobs created less the number of jobs that disappear.³⁸ The scenario below corresponds to the Mayor's targets as set out in the London Environment Strategy. Referred to as the 'Mayor's strategy transition' scenario, this scenario describes how many circular jobs in London can be created by 2030 by moving up the waste hierarchy using circular approaches instead of linear approaches.

The scenario is driven by preventing waste, using stuff wisely, renting not buying, making things well, sharing and using stuff again through a variety of circular business models.

It is likely that new jobs, for example in the emerging circular sectors (such as renting, sharing and reuse), will offer new opportunities (with the right training) as developments continue to evolve beyond 2030. How and where such changes in jobs occur as London's economy evolves beyond 2030 are not considered in the circular scenario in this report. However, the analysis clearly shows that an expansion of the circular economy and moving up the waste hierarchy results in more jobs for Londoners. For example, preventing 10,000 tonnes of waste means one job is lost in waste incineration compared to 386 jobs created in prevention and redistribution sectors.³⁹



Preventing 10,000 tonnes of waste bound for incineration would lead to the **loss of 1 incineration job** and the **creation of 386 jobs** in circular businesses.



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