



**SCOTTISHPOWER
RENEWABLES**

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Socio-Economics and Tourism Clarification Note (SZC CIA)

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
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Applicable to East Anglia ONE North and East Anglia TWO



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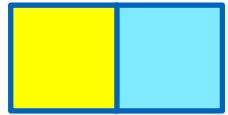
Glossary of Acronyms

CIA	Cumulative Impact Assessment
DCO	Development Consent Order
ES	Environmental Statement
ESC	East Suffolk Council
FTE	Full Time Equivalent jobs per year
HB	Home Based
LPA	Local Planning Authority
NHB	Non-Home Based
SCC	Suffolk County Council
SoCG	Statement of Common Ground
SPR	ScottishPower Renewables
SZC	Sizewell C
SZC Co.	NNB Generation Company (SZC) Limited



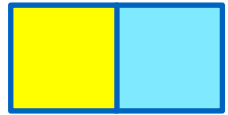
Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.



1 Introduction

1. This clarification note has been prepared by East Anglia TWO Limited and East Anglia ONE North Limited (the Applicants) to clarify aspects of the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications).
2. This clarification note relates to the cumulative impact assessment (CIA) undertaken as part of the Environmental Impact Assessment (EIA) for the East Anglia TWO project and the East Anglia ONE North project (the Projects) presented in **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) of the relevant Environmental Statement (ES). Given the submission of the Sizewell C New Nuclear Power Station (SZC) application for a DCO, more complete information is now available regarding that project which could affect the conclusions of the Applicants' CIA.
3. NNB Generation Company (SZC) Limited (SZC Co.) submitted its DCO application in May 2020 and this was accepted for Examination on 24th June 2020.
4. This document is applicable to both the East Anglia ONE North and East Anglia TWO DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it from the other project submission.



2 Tourism Accommodation

2.1 Purpose

5. This section of the clarification note has been prepared following consultation with the local planning authorities, Suffolk County Council and East Suffolk Council (the LPAs) during statement of common ground (SoCG) meetings regarding tourism. The LPAs have raised matters around the capacity of the accommodation sector in the local area to accommodate construction workers. Given the large number of construction workers required for SZC, these workers form a key part of the tourism, recreation and socio-economic cumulative impacts with the Projects. The Applicants undertook the CIA based upon information available from SZC Co. in 2019. This information has been superseded by the information contained with the SZC DCO application. Therefore, the LPAs have requested that the Applicants revisit the CIA with regard to the potential impacts upon tourist accommodation during construction as a key concern.
6. It is worth noting that none of the assumptions regarding the Projects used in **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) have changed since the Applications were made. The LPAs' comments relate solely to the potential cumulative impact with SZC, not the cumulative impacts of the Projects if constructed simultaneously. Given this, the LPAs have:
 - Agreed that the Applicants' labour market assumptions and subsequent assessment are acceptable both for a single Project alone and both Projects cumulatively (the worst case being parallel construction) (ExA.SoCG-2.D1.V2).
 - Agreed that the Applicants' local accommodation assumptions and subsequent assessment of worker accommodation and impact upon businesses are acceptable both for a Project alone and both Projects cumulatively (the worst case being parallel construction) (ExA.SoCG-2.D1.V2).
7. The following sections of this note therefore address the implications for the cumulative scenario when SZC is included in light of the information on worker numbers and assumptions on accommodation presented in the SZC ES.

2.2 Effects on the Tourist Accommodation Sector

8. The LPAs have reserved judgement on the cumulative case with SZC with regard to effects on the tourist accommodation sector from non-home-based (NHB) workers. This note therefore considers the assumptions made by the Applicants



in the relevant CIA, **section 30.7.2** of **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) with the SZC application materials.

9. For this review the Applicants have considered the following documents from SZC:

- Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195)
- Volume 2 Main Development Site Chapter 9 Socio-economics Appendices 9A - 9F (SZC APP-196)
- Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578)

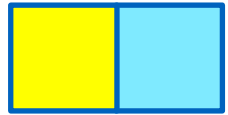
2.2.1 CIA from the Projects' Applications

10. The worst case scenario for the Applicants' CIA is presented below (see **section 30.7.2.1.3.1** and **section 30.7.2.1.3.2** of **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078)):

- Both Projects would be in construction simultaneously with a peak employment of 307 workers;
- This translates into a requirement for 196 rooms to accommodate NHB workers;
- 360 rooms are required for NHB workers from SZC during peak civils period¹ (which represents the peak number of SZC workers and therefore the worst case);
- Based upon the assumption that NHB workers commute 45 minutes, 2,107 rooms are available within the 45 minute travel area;
- Of these 2,107 rooms, actual availability will fluctuate dependent upon the season with 60 – 20% availability from low to peak season; and
- Worst case scenario therefore assumes that peak NHB workers for all three projects coincide (totalling 556), in which case in peak tourist season there is a potential excess demand of 32% (see **Table 30.91**).

11. Although the potential for excess demand is noted in the assessment, this is concluded to be unlikely (as this is dependent upon all peaks coinciding (**Table**

¹ Estimates of the employment generated by SZC during construction were provided in SZC Co Stage 3 consultation material, EDF Energy (2019) Sizewell C. Stage 3 – Volume 2A Preliminary Environmental Information <https://www.edfenergy.com/download-centre?keys=&tid=1380&year%5Bvalue%5D%5Byear%5D>



30.93)), therefore overall the cumulative demand utilising otherwise available accommodation is considered to be beneficial.

2.2.2 Review of SZC Application CIA

2.2.2.1 SZC Worker Numbers

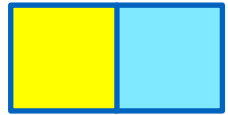
12. Table 4.3 of Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) presents SZC Co.'s assumptions around NHBs for SZC. Table 4.3 gives construction dates of 2022 – 2033 for SZC, with the peak worker numbers occurring in Year 6 (2028). This peak is assumed to after the completion of the construction of the Projects (for which onshore construction is assumed to be 2024 – 2026). Although the overall numbers of workers presented in Table 4.3 are higher than those presented in the Applications' CIA, this table supports the Applicants' assumption that construction peaks (and hence the worst case scenario for NHB worker numbers) will not overlap.

2.2.2.2 SZC Approach to CIA

13. SZC Co. do not assess cumulative impacts upon the accommodation sector.
14. SZC Co, note in Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) that

“4.3.30 In years where there is an overlap [of construction], cumulative NSIP demand is less than Sizewell C's overall peak and represents an average increase of c.18% over the demand generated by Sizewell C (noting that this is well below the overall peak, and would be supported by the mitigation/enhancement measures implemented by these NSIPs set out in Tables 4.1 and 4.2).

4.3.31 As such, cumulative effects related to the labour market during the construction phase are likely to be no more significant than the effects generated by Sizewell C and reported in Volume 2, Chapter 9 of the ES”.
15. SZC Co. has assumed that the cumulative effect of all three projects is not the worst-case scenario for construction worker numbers. The worst case scenario is taken to be that from SZC alone at its overall peak in 2028. It therefore follows that the peak demand for tourist accommodation from NHB workers would also align with the SZC construction peak.
16. SZC Co. concludes in Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) that:



“4.3.64 It is not possible to determine the extent to which the other NSIPs would generate demand for a NHB workforce which may have the potential to overlap with Sizewell C’s workforce and add to demand for accommodation and public services, as the extent of the workforce required by these NSIPs has not been considered to that level of granularity (e.g. in terms of Home Based (HB) and NHB split) in the environmental statements for those projects².

4.3.65 However, SZC Co.’s mitigation strategies have been set in place to mitigate the peak effects of Sizewell C’s workforce, which....is anticipated to be greater than cumulative effects in preceding years. As such, cumulative effects of the construction workforce from NSIPs on demand for accommodation and public services is likely to be no greater than the significance of effects identified in Volume 2, Chapter 9 of the ES, for which mitigation is identified”.

17. SZC Co. has developed an Accommodation Strategy (SZC APP-613) which provides mitigation for the tourist accommodation sector as described in Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195), section 9.8:

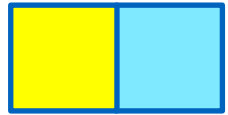
“9.8.23 In order to help manage the distribution of workers and avoid or reduce potential adverse effects on accommodation capacity in local areas in a responsive way, SZC Co. would work with partners to develop mechanisms that:

- 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”

18. The Applicants consider that the SZC application materials support the conclusions within the Applications, given that significant cumulative impact is:
- Not likely to occur (due to construction programmes),
 - Caused in the larger part of any theoretical impact by SZC; and
 - Mitigated by the package of measures that SZC Co. has committed to a for SZC’s peak impacts irrespective of any cumulative considerations.

² Note that this statement from SZC Co. is inaccurate. The Applicants’ CIA does include a breakdown of HB and NHB workers



2.2.3 Further Consideration

19. The Applicants are aware that the conclusion to **section 2.2.2** may appear to be simplistic as it takes at face value the conclusions of Volume 10 Project-wide, Cumulative and Transboundary Effects Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) without critical appraisal. The Applicants have therefore reviewed the assumptions in the Applications against the information from the SZC application.
20. The key parameters which relate to impacts on tourist accommodation are:
 - Worker numbers; and
 - Availability of accommodation.

2.2.3.1 Worker Numbers

21. The worst case scenario for the Applicants' CIA was based upon assumptions on NHB worker numbers for the SZC civils peak (see **section 30.7.2.1.3.1** and **section 30.7.2.1.3.2**). These were listed in **paragraph 320** as:
 - Accommodation campus – 2,400 staff;
 - Private rented sector – 360 staff;
 - Wider housing market – 460 staff; and
 - Tourism accommodation sector – 360 staff.
22. The workforce accommodation assumptions used in the SZC application are shown in Table 1.1 of Volume 2 Appendix 9C Workforce Spatial Distribution (SZC APP-196), however, this is based upon the peak employment of 7,900, not the civils peak of 6,000 (see Volume 2 Appendix 9A Technical Note 1 Workforce Profile, section 1.4 (SZC APP-196)). **Table 1** therefore presents a worse case than that for the civils peak, however as no other figures are available, the Applicants have used these to estimate (based on the ratio of overall peak to civils peak workforce) the accommodation split at the SZC civils peak.



Table 1 Worker Accommodation Assumptions for SZC (HB – Home Based, NHB – Non-Home Based)

Worker Type / Accommodation Sector	Sizewell ES Workers Appendix 9C, Table 1.1 (SZC APP-196)	Sizewell Civils Peak (derived from peak 7,900 to civils peak of 6,000)	Numbers used in the EA1N and EA2 assessment (APP-078)
Total workforce (Peak)	7,900	6000	n/a
HB (construction)	2,016	1,190	n/a
HB (associated development)	600	354	n/a
NHB (accommodation campus)	2,400	2,400	2,400
NHB (caravan site)	600	600	Not considered
NHB (private rented)	1,200	708	360
NHB (tourist)	802	473	360
NHB (owner-occupied – construction)	649	383	Not considered
NHB (operational)	233	138	Not considered
'Wider housing market' (included by the Applicant only)	-	-	460
Total NHB	5884	4702	3580

23. From **Table 1** the following can be noted:

- NHB worker numbers for the civils peak are approximately 1,100 higher than those assumed in the Applications;
- However, the Applications did not consider the provision of caravan accommodation alongside the SZC campus, therefore if this is taken into account, 600 more accommodation spaces are available than originally assumed; and
- This leaves approximately 500 excess workers to accommodate over and above the Applicants' assessments:
 - However, SZC Co. incorporate for some of this excess in the owner occupied and private rent categories.
 - This leaves just **113 additional workers** not accounted for in tourist accommodation.



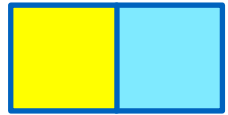
24. On the basis of the Applicants' assessment, adding in 113 excess workers and updating the calculation presented in **Chapter 30 - Tourism, Recreation and Socio-Economics** (APP-078) **Table 30.91**, would result in reductions in headroom of availability in the off-season (but still not exceed capacity) and an increase in excess demand from 32% to 59% in peak tourist season. **Therefore, there would be no material change to the Applications' conclusions** – there would still only be an excess demand issue in peak tourist season, with the larger part of that demand coming from SZC.

2.2.3.2 Availability of Accommodation

25. It should also be noted that the assumptions used in the SZC and Projects' assessments were slightly different. SZC assumed a 60-minute travel area which results in a potential 3,100 available bed spaces during peak season (see section 9.5.53 of Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195)), whereas the Projects assumed a 45-minute travel area with only 2,107 rooms of which only 421 would be available during the peak season.
26. It is not clear if in the SZC assessment 'bed spaces' equate to rooms. However, even if this is assumed to relate to two beds per room and the 3,100 figure was halved this would still result in 1,550 available rooms within 60 minutes. On that basis, the excess demand could easily be accommodated.
27. It is noted that the SZC assessment concludes (section 9.7.146 – 9.7.148 of Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195)) that there is capacity in the accommodation sector generally (i.e. within the 60 minute travel area) but there remains potential for significant adverse effects in Aldeburgh and Leiston (hence the requirement for mitigation in the relevant sections of the Accommodation Strategy for SZC (SZC APP-613)).

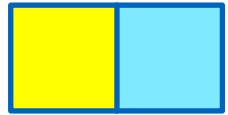
2.2.3.3 Summary

28. Using the updated SZC Co. numbers would not change the Applications' conclusions materially; there would still be potential for excess demand in the peak season and headroom in other seasons. The caveats from the Applications' conclusions would apply, however, that excess demand would only result from a worst-case scenario which would be unlikely to occur given project programmes (as illustrated by SZC Co. in Table 4.3 and Plate 4.2 of Volume 10 Project-wide, Cumulative and Transboundary Effects Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578)). Therefore, the conclusions would remain unchanged.
29. In addition, if a wider 60-minute travel area were used as per the SZC assessment the excess workers could be accommodated.



2.3 Conclusions

30. The SZC application documents have been reviewed to understand if updates to the SZC worker numbers or accommodation assumptions used by the Applicants in the CIAs presented in the Applications would change the conclusions of those assessments.
31. Although there are changes to the worker numbers presented for SZC in the SZC application documentation the Applicants do not consider that these would materially change the conclusions presented in the Applications. The Applicants have concluded this both from a review of the SZC CIA conclusions and by taking the SZC project-alone numbers and re-running the cumulative assessment presented in the Applications.



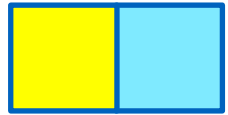
3 Construction Employment Cumulative Impact Assessment

3.1 Purpose

32. This section of the clarification note has been prepared following consultation with the local planning authorities, Suffolk County Council and East Suffolk Council (the LPAs) during statement of common ground (SoCG) meetings regarding socio-economics. In particular, this note concerns cumulative impacts upon the labour market during construction when the Projects and SZC are considered together.
33. The Applicants undertook the CIA based upon information available from SZC Co. in 2019. This information has been superseded by the information contained with the SZC DCO application.
34. It is worth noting that none of the assumptions regarding the Projects used in **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) have changed since the Applications were made. The LPAs' concerns relate solely to cumulative impact with SZC, not the cumulative impacts of the Projects if constructed simultaneously. Given this, the LPAs have agreed that the Applicants' labour market assumptions and subsequent assessment are acceptable both for either the East Anglia ONE North project or the East Anglia TWO project alone and both Projects cumulatively (the worst case scenario being parallel construction) (ExA.SoCG-2.D1.V2).
35. In addition to the changes due to updates to the SZC information, the LPAs have requested that the implications of the East Anglia Hub be considered.
36. **Section 3.2** of this note addresses the implications for the cumulative scenario of the Projects and SZC, when SZC is included in light of the information on worker numbers presented in the SZC ES.
37. **Section 3.2.3** of this note addresses the implications for the cumulative scenario of the Projects and the East Anglia Hub.

3.2 Construction worker numbers

38. The LPAs have reserved judgement on the cumulative impacts upon the labour market during construction when the Projects and SZC are considered together. This note therefore considers the assumptions made by the Applicants in the relevant CIA, **section 30.7.2** of **Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) with the SZC application materials.



39. For this review, the Applicants have considered the following documents from the SZC application:

- Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195);
- Volume 2 Main Development Site Chapter 9 Socio-economics Appendices 9A - 9F (SZC APP-196); and
- Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578).

3.2.1 CIA from the Projects' Applications

40. The worst case scenario for the Applicants' CIA is presented below (see **section 30.7.2.1.1 of Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078)):

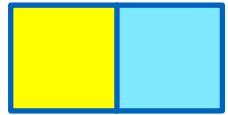
- Both the Projects would be in construction simultaneously with a peak employment of 307 workers (for the purposes of the worst-case scenario all these are assumed to be civil engineering construction workers and home based);
- The worst case cumulative scenario with SZC would be at their 'civils peak' (i.e. when there is greatest overlap of workers relevant to the Projects) when there are assumed to be 1,860 workers and would be home based (see **Table 30.88**); and
- Taken together, this peak local employment demand would represent 2,167 workers from a labour market of 71,050. This would represent 3.05% of the labour market and a high magnitude of effect (see **Table 30.89**).

41. This effect is considered to translate into a major beneficial impact for the local labour market. It should be noted that the Applicants' conclusions are caveated in **Table 30.90 of Chapter 30 Tourism, Recreation and Socio-Economics** (APP-078) by the following:

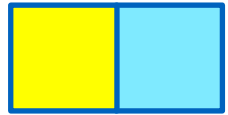
42. *"It is plausible that onshore construction of the proposed East Anglia TWO and ONE North projects and Sizewell C would be undertaken concurrently but it is not known if the peak employment period for both projects would occur at the same time".*

3.2.2 Review of SZC application CIA

43. SZC Co. does not assess cumulative impacts upon the labour market.



44. SZC Co notes in Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) that:
- “4.3.30 In years where there is an overlap [of construction], cumulative NSIP demand is less than Sizewell C’s overall peak and represents an average increase of c.18% over the demand generated by Sizewell C (noting that this is well below the overall peak, and would be supported by the mitigation/enhancement measures implemented by these NSIPs set out in Tables 4.1 and 4.2).*
- 4.3.31 As such, cumulative effects related to the labour market during the construction phase are likely to be no more significant than the effects generated by Sizewell C and reported in Volume 2, Chapter 9 of the ES”.*
45. SZC Co. has assumed that the cumulative effect of all three projects is not the worst-case scenario for construction worker numbers. The worst case scenario is taken to be that from SZC alone at its overall peak in 2028. Table 4.3 of Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) presents SZC Co.’s assumptions around home based workers for SZC. Table 4.3 gives construction dates of 2022 – 2033 for SZC, with the peak worker numbers occurring in Year 6 (2028).
46. Table 4.3 does not break this workforce down into the different categories of worker, this is instead provided in Volume 2 Appendix 9A Technical Note 1 Workforce Profile (SZC APP-196). Table 1.8 of this document gives the home based civils peak workers total as 1,625, whereas Table 1.9 puts this figure at 1,780 (the civils peak in Year 7). Using the highest of these numbers would give a total 2,087 home based civils workers cumulatively with the Projects, which translates into 2.94% of the labour market of 71,050. This is slightly lower than the percentage assumed in the Applications (3.05%).
47. If the absolute peak home based workers from SZC were used instead (as presented in the 2028 row of Table 4.3 of Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578)), this would equate to 2,250 workers and would give a total 2,557 home based civils workers cumulatively with the Projects, which translates into 3.6% of the labour market of 71,050. This is slightly higher than the percentage assumed in the Applications (3.05%).



48. Given that the above percentages and those provided in the Applications' CIAs are close in range, it is considered that the assumptions of the Applications remain valid.

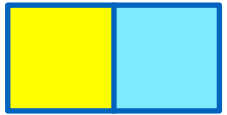
3.2.3 Consideration of East Anglia Hub

49. ScottishPower Renewables (SPR) is proposing to construct its future offshore windfarms, the consented East Anglia THREE and the Projects, as a new 'East Anglia Hub'.
50. In the event that full consents are achieved in 2021 for the Projects, the East Anglia Hub concept will enable the accelerated development of these projects and increase efficiencies. This could deliver multiple and wide reaching benefits such as reduced construction timescales, sustained contracting opportunities for the supply chain and a reduction in the cost of clean, renewable energy.
51. If the East Anglia Hub concept is progressed, construction is likely to be sequential, however, the worst case scenario of parallel construction has been assessed.
52. The Applicants have considered the parallel scenario below using information from **Section 3.2** above and the East Anglia THREE application (available on the Planning Inspectorate website³). Section 28.8.3 of Chapter 28 Socio-economics, Tourism and Recreation (EA3 APP-136) presents the relevant information on worker numbers and estimates that the onshore construction of East Anglia THREE would require 285 workers. This is not broken down, but as per the Projects, the assumption is that the majority of these workers would be civils. If these 285 are added to the updated cumulative totals from **section 2.2.2**, the cumulative total would be 2,372 home based civils workers, which translates into 3.34% of the labour market of 71,050. This is slightly higher than the percentage assumed in the Applications (3.05%).
53. Given that the above percentage and those provided in the Applications' CIAs are close in range it is considered that the assumptions of the Applications remain valid.

3.3 Conclusions

54. Using the updated SZC Co. numbers would not change the Applications' conclusions materially, there is a small (<0.5%) difference in the magnitude of effect on the labour market.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010056/EN010056-000413-6.1.28%20Volume%201%20Chapter%2028%20Socio%20Economics%20Tourism%20and%20Recreation.pdf>



55. Parallel onshore construction with East Anglia THREE would not occur even if the East Anglia Hub concept is taken forward. However, the Applicants have reviewed the numbers for this hypothetical case and there would be a 0.3% difference in the magnitude of effect on the labour market. Again, this would not change the Applications' conclusions material.