

# East Anglia ONE North and East Anglia TWO Offshore Windfarms

# Applicants' Responses to Examining Authority's Written Questions 2

### Volume 7 – 2.17 Socio Economic Effects

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited Document Reference: ExA.WQ-2.D6.V1\_07 SPR Reference: EA1N\_EA2-DWF-ENV-REP-IBR-001239\_07 Rev 01

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Applicable to East Anglia ONE North and East Anglia TWO



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### **Glossary of Acronyms**

AONB	Area of Outstanding Natural Beauty
DMO	Destination Management Organisation
EIA	Environmental Impact Assessment
IMD	Index of Multiple Deprivation
ISH	Issue Specific Hearing
LLSOA	Lower-layer Super Output Areas
NALEP	New Anglia Local Enterprise Partnership
SPR	ScottishPower Renewables
SZC	Sizewell C



### Glossary of Terminology

Applicants	East Anglia TWO Limited / East Anglia ONE North Limited
Cable sealing end	A compound which allows the safe transition of cables between the
compound	overhead lines and underground cables which connect to the National Grid
Cable sealing and (with	Substation.
circuit breaker)	transition of cables between the overhead lines and underground cables
compound	which connect to the National Grid substation.
Construction	Compounds associated with the onshore works which may include
consolidation sites	elements such as hard standings, lay down and storage areas for
	construction materials and equipment, areas for vehicular parking, welfare
	facilities, wheel washing facilities, workshop facilities and temporary
	A fixed offshore structure required for construction, operation, and
and maintenance	maintenance personnel and activities
platform	
The Councils	East Suffolk Council and Suffolk County Council
Development area	The area comprising the onshore development area and the offshore
	development area (described as the 'order limits' within the Development
	Consent Order).
East Anglia ONE North	The proposed project consisting of up to 67 wind turbines, up to four
project	offshore electrical platforms, up to one construction, operation and
	operational meteorological mast up to two offshore export cables, tip to the
	optic cables, landfall infrastructure, onshore cables and ducts, onshore
	substation, and National Grid infrastructure.
East Anglia TWO	The proposed project consisting of up to 75 wind turbines, up to four
project	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, libre
	substation, and National Grid infrastructure.
East Anglia TWO	The offshore area within which wind turbines and offshore platforms will be
windfarm site	located.
European site	Sites designated for nature conservation under the Habitats Directive and
	Birds Directive, as defined in regulation 8 of the Conservation of Habitats
	And Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include
	candidate Special Areas of Conservation Sites of Community Importance
	Special Areas of Conservation and Special Protection Areas.
Generation Deemed	The deemed marine licence in respect of the generation assets set out
Marine Licence (DML)	within Schedule 13 of the draft DCO.
Horizontal directional	A method of cable installation where the cable is drilled beneath a feature
drilling (HDD)	without the need for trenching.
וועם temporary working	for HDD drilling works



Inter-array cables	Offshore cables which link the wind turbines to each other and the offshore electrical platforms, these cables will include fibre optic cables.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Meteorological mast	An offshore structure which contains metrological instruments used for wind data acquisition.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
Marking buoys	Buoys to delineate spatial features / restrictions within the offshore development area.
Monitoring buoys	Buoys to monitor <i>in situ</i> condition within the windfarm, for example wave and metocean conditions.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO / East Anglia ONE North project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO / East Anglia ONE North project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Offshore cable corridor	This is the area which will contain the offshore export cables between offshore electrical platforms and landfall.
Offshore development area	The East Anglia TWO / East Anglia ONE North windfarm site and offshore cable corridor (up to Mean High Water Springs).



Offshore electrical infrastructure	The transmission assets required to export generated electricity to shore. This includes inter-array cables from the wind turbines to the offshore electrical platforms, offshore electrical platforms, platform link cables and export cables from the offshore electrical platforms to the landfall.
Offshore electrical platform	A fixed structure located within the windfarm area, containing electrical equipment to aggregate the power from the wind turbines and convert it into a more suitable form for export to shore.
Offshore export cables	The cables which would bring electricity from the offshore electrical platforms to the landfall. These cables will include fibre optic cables.
Offshore infrastructure	All of the offshore infrastructure including wind turbines, platforms, and cables.
Offshore platform	A collective term for the construction, operation and maintenance platform and the offshore electrical platforms.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO / East Anglia ONE North project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO / East Anglia ONE North substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO / East Anglia ONE North project.
Platform link cable	Electrical cable which links one or more offshore platforms. These cables will include fibre optic cables.
Safety zones	A marine area declared for the purposes of safety around a renewable energy installation or works / construction area under the Energy Act 2004.
Scour protection	Protective materials to avoid sediment being eroded away from the base of the foundations as a result of the flow of water.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.
Transmission DML	The deemed marine licence in respect of the transmission assets set out within Schedule 14 of the draft DCO.



ExA. Question Ref.	Question addressed to		ExA. Question	Applicants' Response
2.17 Socio	economic Eff	ects	i	
2.17.1	Applicants		Socio-Economic benefits of the EA1 and EA3 projects The ExAs note your written summary of oral case for ISH5 [REP5-029]. The ExAs also note the views of SASES on this issue [REP5-101]. If you wish to do so, expand on your answer at ISH5 of the socio-economic benefits of the above projects, particularly in a local context relative to the direct area of the projects.	GeographyThe Projects' Environmental Statements define local, regional and national study areas, and applies an agreed methodology for calculating job procurement in these areas.Local: The assessment considers local employment to be that which is taken by residential workers. Therefore, the local study area for onshore construction employment will be the districts/boroughs of Suffolk Coastal, Waveney, Great Yarmouth, and Ipswich. It is assumed that 36% of direct employment will be locally procured. This assumption has been agreed with East Suffolk Council.Regional: The assessment considers the regional study area as New Anglia Local Enterprise Partnership (NALEP), i.e. the two counties of Norfolk and Suffolk. For the purposes of assessment, it is assumed that 48% of direct employment will be from the regional study area.National. 16% of direct employment is assumed to be procured from outside of NALEP during construction.At Issue Specific Hearing (ISH)5, 3a, the reference area for the micro economic analysis was this local definition, i.e. the districts/boroughs of Suffolk Coastal, Waveney (now East Suffolk Council), Great Yarmouth, and Ipswich. The analysis of the macro economic benefits naturally referenced a larger geography, that of Norfolk, Suffolk and Essex, the three counties that together define the Energy Coast.These three counties have previously been used to communicate the extent of local supply chain activity (e.g. in the suppliers map presented in the East Angle autumn winter 2020/2021 edition) because

ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			they are recognisable locally, and by Government, as where the East of England's offshore wind supply chain is clustered.
			East Anglia (Cambridgeshire, Norfolk and Suffolk), has great historical significance, and the name lives on in many organisations and institutions, but is less useful for defining economic activity associated with offshore wind farms.
			The East of England, (Norfolk, Suffolk, Essex, Cambridgeshire, Hertfordshire and Bedfordshire). ScottishPower Renewables (SPR) have awarded contracts across these counties and so when looking at the macro economic benefits of the projects it is an appropriate geography to reference . In terms of the ES, contracts awarded outside of Norfolk and Suffolk would be classified as UK contribution.
			The whole east coast of the UK is a useful national and international reference when describing the concentration of UK offshore wind supply chain activity. But It forms part of the narrative when describing the macro economic context, and specifically in the case of East Anglia ONE, East Anglia THREE, East Anglia ONE North and East Anglia TWO, it is relevant when considering contracts that make up the UK content statistics, e.g. contracts with the Siemens' wind turbine blade factory in Hull.
			Contracts
			The size of duration of supply chain contracts awarded by SPR for an infrastructure project of national significance is wide and varied, from single commissions to long term leases.
			The investment quoted refers to the time period between 2016 and current day, 2016 being the commencement of the construction period. Throughout this time period over 138 organisations from across the

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			East Coast have been engaged with resulting in SPR awarding over 460 purchase orders to companies operating locally.
			The agreement for the delivery of the skills strategy refers to communities associated with the projects. SPR has built a strong relationship with local authorities, education providers and industry groups such as Skills for Energy to make careers and training accessible. An example of this the engagement with the offshore Wind Skills Centre has supported 26 individuals through fundamental training and employability training
			Deprivation Geography The Index of Multiple Deprivation, commonly known as the IMD, is the official measure of relative deprivation for small areas in England. They are a unique measure of relative deprivation at a small local area level defined as Lower-layer Super Output Areas (LSOA) across England.
			The IMD ranks every small area in England from 1 (most deprived area) to 32,844 (least deprived area). The latest figures available are from the IMD2019. <sup>1</sup>
			This data reveals concentrated areas of deprivation in the ports of Great Yarmouth (Norfolk), Lowestoft (Suffolk) and Harwich (Essex). All three host LSOAs that are within the 10% most deprived in England.
			Concentrating on the local and regional areas as defined in the Environmental Statement, Great Yarmouth outer harbour ranks as the 767 <sup>th</sup> most deprived LSOA out of the 32,844 LSOAs in England. Lowestoft outer harbour ranks 64 <sup>th</sup> . These multiple indices of

<sup>1</sup> <u>http://dclgapps.communities.gov.uk/imd/iod\_index.html#</u>

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ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			deprivation are even more disconcerting when broken down into their components.
			The outer harbour in Great Yarmouth ranks by employment as 592 <sup>nd</sup> out of 32,884, by income 445 <sup>th</sup> and by education, skills and training it is 74 <sup>th</sup> .
			The outer harbour in Lowestoft ranks by employment 26 <sup>th</sup> out of 32,884, by income 57 <sup>th</sup> and by education, skills and training it is 330 <sup>th</sup> . The disparities in income wealth and opportunity that these statistics reveal is heightened when comparisons are made with nearby communities. In Lowestoft's outer harbour ward (larger than the LSOA) the life expectancy for males at birth is 73.9 years and for females it is 80.2 years. In Aldeburgh, life expectancy for males is nearly 10 years longer at 82.9 years and 86.6 years for females. <sup>2</sup> The health inequalities follow the same undesirable trends. The Heath Deprivation and Disability indices ranks Lowestoft outer harbour the 139 <sup>th</sup> most deprived LSOA in England, contrasting with Aldeburgh at 25,202 <sup>nd</sup> .
			Levelling up The UK is by many measures one of the most geographically unequal developed economies. The Government has set out its intention to address this inequality and 'level up' underperforming and left-behind parts of the UK through a programme of infrastructure development, investing in education, skills and scientific R&D. This policy offers unrivalled opportunities for Lowestoft and Great Yarmouth. Both towns have new ensured investment for new bridges that will provide both

<sup>&</sup>lt;sup>2</sup> Source: ONS, 2013-2017 data. Accessed via localhealth.org.uk. Data not yet available for the new 2019 East Suffolk wards

ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			flood resilience to the towns, as well as much needed infrastructure to support the developing ports.
			The levelling up policy is further reinforced in Great Yarmouth and Lowestoft by the Government's other policies of promoting a Green Industrial Revolution, setting a zero-carbon target, agreeing an Offshore Wind Sector deal, and pledging to power every UK home with electricity from offshore wind farms by 2030.
			The destination centres for offshore windfarm investments map, almost exactly, over the areas of highest deprivation. Since the IMD in 2019, ScottishPower Renewables has invested £5m in the Great Yarmouth outer harbour LSOA. In Lowestoft, SPR has invested £25m in the outer harbour LSOA and its Operations and Maintenance base located there has created 100 jobs in the 65 <sup>th</sup> most deprived (by employment) LSOA in the UK.
			This combination of Government policy and offshore wind industry investment is a positive alignment for Great Yarmouth and Lowestoft that, if sustained, will have a measurable and positive impact on these deprivation statistics as well as reinforcing prosperity where supply chain contracts are awarded in more privileged LSOA's across the UK.
2.17.2	Applicants	Local demographics Various IPs raise the issue of the number of people who choose to retire to the local area, raising concerns	The premise is highly subjective, and the indication from current information on estate agency websites is that the current housing market is robust.
		over the potential loss of such an inward flow of people and the investment that they bring in terms of time and resources to local communities and facilities. Do you have any views on this issue?	ine Applicants reiterate that for the Projects alone (or cumulatively but without Sizewell C (SZC) case, potential deterrents to people moving to the area would be restricted to the footprint of the onshore development area during construction and temporary adverse impacts (regarding visual effects of construction, noise etc). During operation,

ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			residual impacts would be restricted to those areas which would be affected by visual impacts from the substation, again this is a limited spatial footprint. Cumulative effects with SZC would be limited, given that there is no overlap of order limits and direct impacts would be experienced within those. With regard to the cumulative transport effects, which have the largest spatial footprint and may affect a larger number of people than direct construction effects, both the Applicants and SZC Co are working closely with the Councils in order to mitigate their own impacts and ensure cooperation and coordination between projects to reduce effects. It is by avoiding or mitigating construction effects that both the Applicants and SZC Co would avoid both direct effects and perception effects which could be a pathway for changes in behaviour as suggested in this question.
2.17.3	Applicants	<ul> <li>Construction</li> <li>The Socio Economics and Tourism Clarification note [REP1-036] states that in terms of hotel accommodation that there will only be excess demand in peak season and only where both projects are constructed in parallel and coincides with SZC peak.</li> <li>a) Be that as it may, will such an excess demand not create issues in terms of hotel demand, potentially pushing tourists who may spend more in the local economy than construction workers out of the market?</li> </ul>	<ul> <li>a) The Applicants reiterate that the conditions under which the scenario presented could occur are unlikely given that:</li> <li>The Projects' requirement for accommodation in the worst case of simultaneous construction is estimated to be 196</li> <li>SZC's requirement for accommodation in their peak is 4,700</li> <li>The peak for SZC is assumed to occur in Year 6 (2028)</li> <li>Onshore construction for the Projects is planned to be completed by 2026</li> </ul>

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ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			SZC Co have not assessed a cumulative scenario as they consider that "In years where there is an overlap [of construction], cumulative NSIP demand is less than Sizewell C's overall peak"
			As SZC Co have acknowledged that they have to potential to cause significant effects <i>alone</i> they have prepared an Accommodation Strategy (SZC APP-613) <sup>3</sup> . The strategy states:
			1.1.5 In response to the requirement for a large NHB workforce, SZC Co. has developed a balanced Accommodation Strategy. This strategy makes use of existing local accommodation where possible, in order to deliver local economic benefits, but also seeks to avoid impacts on the local accommodation market by providing temporary project accommodation in the form of a single, 2,400 bed accommodation campus on the main development site and a caravan park with up to 400 pitches (with an estimated occupancy of 1.5 workers per caravan) on the land east of Eastlands Industrial Estate in Leiston (LEEIE).
			1.1.6 SZC Co. is also proposing to establish a Housing Fund to support the local housing market during the construction phase by boosting and improving the efficiency of existing supply, providing resilience, and supporting the delivery and management of tourist accommodation.
			In Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) SZC Co. conclude that:
			4.3.65 However, SZC Co.'s mitigation strategies have been set in place to mitigate the peak effects of Sizewell C's workforce, whichis anticipated to be greater than cumulative effects in preceding years. As such, cumulative effects of the construction workforce from NSIPs on

<sup>3</sup> https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010012/EN010012-002231-SZC\_BK8\_8.10\_Accommodation\_Strategy.pdf

ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			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".
			In conclusion, the Applicants consider that the potential issue described in the question is not relevant to the Projects given:
			• The small scale of the Project alone effect (or even combined effect of simultaneous construction of the Projects); and
			• The fact that the worst case scenario (i.e. simultaneous construction of the Projects at the SZC peak) is unlikely to occur.
			• In the unlikely event that the worst case scenario does occur, that SZC Co. have already committed to mitigating their impacts which they consider greater than any likely cumulative impact.
		b) Figures of an excess demand of 32% up to 59% in peak season appear quite high. Has there been any assessment of how such figures would impact on the local tourist economy?	SZC Co. have undertaken studies of their impacts which have led to the development of their proposals for the Accommodation Strategy (SZC APP-613).
		c) SEAS state [REP2-081] that Sizewell C Caravan Park will have 400 spaces, as opposed to 600 as in the Clarification Note and that information from the construction of Hinkley Point has shown that many long-term workers move off site to find accommodation as they prefer their own privacy. Do you have any views on this?	The Applicants would refer to Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP-195)) which states at paragraph 9.7.115 that <i>"600 caravan bedspaces (assuming a utilisation rate of 1.5 applied to 400 caravan plots) would be provided".</i> The Applicants note that SZC is currently under examination and SZC Co's assumptions will be examined in that process. It is not appropriate
			for the Applicants to comment on another application.

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ixA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
			The Applicants note that EDF have experience with a larger workforce (in the 1,000s) from Hinkley Point that is larger than the Applicants' experience of workforces which are orders of magnitude smaller (in the 100s) and employed for much shorter periods. The Applicants therefore would suggest that EDF are better placed to understand the behaviour of that type of workforce.
		d) Have the impacts of the cumulative hotel accommodation studies been assessed in terms of traffic impact? For example, would the commute allowed for take in Great Yarmouth, Lowestoft, Woodbridge and potentially Ipswich? Have any such resultant effects on the A12 at AM and PM peak times been assessed?	<b>Section26.6.1.3</b> of <b>Chapter 26 Traffic and Transport</b> (APP-074) provides details of how local and 'in-migrant' workers have been assigned to the highway network utilising a 'gravity model'. This approach reviews availability of local labour and rented accommodation (bed spaces) to determine a journey origins and then uses 'distance deterrent' to determine the quantum of workers that may assign onto the network from an identified origin.
			For local labour a maximum commute time of 60mins was assumed and for in-migrant labour a maximum commute time of 45mins was assumed. <i>Table 26.18</i> and Table 26.19 of <i>Chapter 26 Traffic and</i> <i>Transport</i> (APP-074) show the distribution of in-migrant and local workers respectively and includes the journey origins of Great Yarmouth, Lowestoft, Woodbridge and Ipswich.
			This also covers the cumulative Scenario 1 (i.e. parallel construction)

ive Scenario 1 (i.e. parallel construction) between the Projects (Appendix 26.2 of the ES (APP -528) cross references).

The cumulative assessment with SZC is in Sizewell Projects Cumulative Impact Assessment (Traffic and Transport) (REP2-009). This uses the Applicants' traffic assignments and SZC traffic assignments to assess cumulative impacts.



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
2.17.4	Suffolk Coast DMO	<ul> <li>DMO 'The Energy Coast' Report 2019</li> <li>The Applicants [REP5-029] describe the process of arriving at a figure of £24m cost to the tourism industry caused by the projects and Sizewell C within your report as 'fundamentally flawed', due to various reasons including evidence of changes to future behaviour and other methodological reasons.</li> <li>a) Reply to the Applicant's critique of your Report.</li> <li>b) Provide any comments you wish to make on the Sizewell C tourism perception study referred to by the Applicants.</li> </ul>	The Applicants note that these questions are for the DMO. The Applicants would like however to reiterate the points made at ISH5 (and in the SoCG with the LPAs (REP1-072)). The Applicants would have included the findings of The Energy Coast Report within the Environmental Impact Assessment (EIA) if available within the timescales of the Projects' assessments. It is the Applicants' view that this would have provided extra context on receptor sensitivity (taken as a generalised Suffolk coast visitor) but not ultimately changed the conclusions of the impacts of the Projects. The Applicants consider that the report provides useful context on visitor motivations for visiting the Suffolk coast and consideration of possible deterrents which accord with the assumptions of <i>Chapter 30 Tourism,</i> <i>Recreation and Socio-Economics</i> (APP-078). The Applicants do not, however, consider that the extrapolations made from the stated attitudes to a monetised impact assessment are valid.
2.17.5	Applicants	Social issues Various IPs refer to previous experiences of adverse impact on communities relating to large influxes of 'temporary' workers for Sizewell B. Do you have any views on this in relation to the proposals or ways to deal with such potential issues?	The Applicants do not have experience of working with such large workforces (1000's) or ones where the construction period is as long as for a nuclear power station construction programme. As stated above, the Applicants suggest that EDF are better placed to understand and comment upon the behaviour of this type and size of workforce. The Applicants note that SZC Co. have a variety of strategies and mitigations for their potential impacts as listed in <i>Section 9.8</i> of <i>Volume 2 Main Development Site Chapter 9 Socio-economics</i> (SZC APP-195).



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
2.17.6	Applicants	<ul> <li>Social – Tranquillity</li> <li>One of the key qualities of the Suffolk Coast AONB cited by various IPs is tranquillity.</li> <li>a) Do you agree that the tranquillity of the area is a key factor in the reason many tourists come to this area of Suffolk; walking public rights of way, enjoying the beaches and the 'big skies'?</li> <li>b) Would the proposals adversely affect this tranquillity, potentially affecting the number of tourists who may wish to visit the area?</li> </ul>	<ul> <li>a) 'Tranquillity' appears within the list of motivations for visiting the Suffolk Coats - the Destination Management Organisation (DMO) Report groups these as 'nature related motivations'.</li> <li>b) Within the footprint of the onshore development area there would be temporary adverse impacts associated with construction, however these would be limited to that footprint. There is no pathway for a visitor to, for example, Southwold or Dunwich to be affected by these impacts which will be highly localised. Indirect impacts could be experienced by visitors in areas outwith the onshore development area if there are effects on traffic, but effects on roads and travel could not be related to tranquillity (again other than within the immediate area of the onshore development area).</li> <li>Operational impacts from the substation would occur outside of the Area of Outstanding Natural Beauty (AONB) and would be limited in geographic scope to areas outside the AONB. Therefore substation landscape or visual impacts are not relevant in the context of AONB visitors.</li> <li>Operational impacts from the offshore elements are notable by their absence in the stated concerns of stakeholders. The Applicants note that the DMO Report does not list any operational effects of the offshore windfarm as a concern. Likewise, from a review of the relevant representations received by the Projects only nine of the 800+representations from the public mentioned seascape at all. This was also the pattern observed by the Applicants in Public Information Days pre-application, offshore seascape effects were very rarely raised by the public</li> </ul>
2.17.7	Applicants	Cumulative Effects	See response to 2.0.14



ExA. Question Ref.	Question addressed to	ExA. Question d		Applicants' Response	
			Page 199, ID26 of your Deadline 3 responses to SASES [REP3-072] says that following guidance in Planning Inspectorate Advice Note 17 (AN17) various listed projects were not considered in the Cumulative Impact Assessment (CIA) (in terms of socio-economic impacts) as at the time of the CIA there was inadequate detail upon which to base any meaningful assessment.		
			Given the passage of time since the CIA, have your views above altered at all – is there now further details available allowing an assessment to be made? In this respect the ExA note that footnote 10 to AN17 states that 'other existing development and/or approved development' is taken to include existing developments and existing plans and projects that are 'reasonably foreseeable'.		
2.17.8	Applicants, East Suffolk Council		<b>Tourism Fund</b> East Suffolk Council make reference [REP5-046] to a 'Tourism Fund' which is being discussed with the Applicants which could be utilised to support marketing campaigns to promote the area during construction. Provide an update to this Fund, including details of amounts, utilisation and how such a fund will be secured if agreed. If this is to be secured in an Agreement or Obligation or curported by Memorando of Linderstanding (Mella)	The Applicants are of the view the Projects will not have significant impacts upon tourism. However, notwithstanding the above, the Applicants have committed to a Tourism Fund of £150,000 to address representations raised by East Suffolk Council. This would be payable in the event that one or both of the Projects was granted consent. This demonstrates that the Applicants are considerate developers and that we have listened to the comments of East Suffolk Council, who have expressed views shared by the Suffolk Coast Destination Management Organisation. The Applicant is in ongoing discussion with East Suffolk Council with	
			<ul><li>Provide an update to this Fund, including details of amounts, utilisation and how such a fund will be secured if agreed.</li><li>If this is to be secured in an Agreement or Obligation or supported by Memoranda of Understanding (MoUs),</li></ul>	Applicants are considerate developers and that we have list comments of East Suffolk Council, who have expressed vie by the Suffolk Coast Destination Management Organisation The Applicant is in ongoing discussion with East Suffolk Co regard to how the Tourism Fund will be secured, however the	



ExA. Question Ref.	Question addressed to	ExA. Question	Applicants' Response
		please refer to it in your relevant responses to the dDCOs Commentaries.	be administered by an independent body, Suffolk Community Foundation.
2.17.9	Applicants	<ul> <li>SEAS representations on Roads/Traffic and Tourism.</li> <li>Cllr J Trapp on behalf of SEAS [REP5-113] provides a detailed report containing mathematical modelling on the effects of the projects and concluding with effects of job losses of some 440 over the construction period in the local area. Further representations are made by SEAS on the details of ISH5, including a critique of the Biggar Economics Report [REP1-102].</li> <li>Provide any responses you wish to make to the submissions of SEAS.</li> </ul>	<ul> <li>The calculations from Cllr Trapp are based upon the monetised conclusions in the DMO report. No detailed modelling has been undertaken for section 3 of the document. Given that the calculations are based upon the DMO Report, Cllr Trapp's conclusions are based on the cumulative case with SZC, <b>not</b> the Projects (either alone or together). The Applicants do not consider that the economic conclusions of the DMO Report are valid (for reasons stated in the Tourism Impact Review (REP1-102)).</li> <li>In addition to relying on invalid assumptions from the DMO report, the analysis itself is wrong for the following reasons;</li> <li>The author has misunderstood and misapplied the multiplier effects for the source that it references (Deloitte, 2013, Tourism: jobs and growth – The economic contribution of the tourism economy in the UK). The author states that for every 1 tourism job directly created or lost in Aldeburgh, Leiston and Thorpeness another 1 job is either created or lost in the same small area. That is not what the reference says. The reference states that for every job created/lost in the tourism sector 0.7 of a job is created/lost across the UK. At a local level, the multiplier is significantly smaller. By applying a local multiplier of 2 the author has inflated the employment impacts significantly. The inappropriate use of multiplier effects indicates a lack of understanding of economic analysis; and</li> <li>The author assumes that 50% of any change in tourism activity in the Suffolk Coast and Heaths AONB would occur within the Aldeburgh, Leiston and Thorpeness area. No basis is given for</li> </ul>



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			this assumption. Reported employment in the Accommodation and Food service activities (ONS, 2020, Business Register and Employment Survey) in the ward of Aldeburgh and Leiston was equivalent to 37% of the sectors employment in wards within the AONB. Use of this more accurate estimate would further reduce the impacts estimated by Cllr Trapp.
			With regard to SEAS' critique (REP5-112), the author misses the point of the Tourism Impact Review (REP1-102). The purpose of this review was to consider the project-alone effects of the Project (or cumulative effect of the Projects together) to test the conclusions of the EIA on this point. For this, Biggar Economics looked at comparable projects (hence the review of the impacts of other windfarms and their onshore infrastructure in areas of tourism interest / landscape designations). The study does not dispute that the Suffolk Coast and Heaths AONB is, like all areas, unique. However, the tourism market and the visitor profile for the area is similar enough to other areas for comparisons to be made. The comparators focused on areas where the impacts would be similar to that of the Projects and the market segments and attractions are also similar. The DMO Report provided a good understanding of the reasons people visited the Suffolk Coast and the demography of these visitors. This found the visitor market was comparable with the other areas in the assessment. The assessment was therefore able to compare how similar tourism markets respond to similar effects.
			This assessment was not intended to be comparable to the <b>cumulative case</b> in which SZC is included (as in the SEAS 'East Suffolk Energy Hub'). Therefore, this part of the assessment and the case studies looked at only reflect the case of the <b>project alone</b> . SEAS conflate the project alone and cumulative assessments,

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			misrepresenting the purpose of Tourism Impact Review to make their point. The Applicants would also highlight that it is notable that none of the IPs has raised the impacts of East Anglia ONE on the tourist economy of the Suffolk Coast or the AONB. The East Anglia ONE project is similar in that the onshore cable route (including the cables for one project and ducts for a second) passes through the Suffolk Coast area and the AONB (although that project has over 11km of the route within the AONB itself). No evidence has been produced by any IP showing the any significant impact from East Anglia ONE or indeed any impact at all.