

Offshore Wind Farms
EAST ANGLIA ONE NORTH
PINS Ref: EN010077
and
EAST ANGLIA TWO
PINS Ref: EN010078

**SEAS Response to the Applicant's reply to
Roads/Traffic and Tourism REP9-014 &
REP6-064**

Deadline 13 – 5 July 2021
The final Deadline before the nine month examination
closes at midday 6 July 2021

by
SEAS (Suffolk Energy Action Solutions)

Unique Ref. No. EA1(N): 2002 4494

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SEAS representation on Roads/Traffic and Tourism —
comments on Applicant's reply
REP9-014 and REP6-064

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1 Reply to REP9 – 014, 2.3

17

SEAS maintains its stance that the use of the A1094 for construction traffic would be harmful to the fragile tourist industry of Aldeburgh, Thorpeness and Leiston.

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The data was collected during the most normal two months (September and October 2020) of the pandemic when schools had re-opened, and businesses were mostly back to work. The anecdotal evidence is that these two months were similar to pre-pandemic traffic density.

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The SPR data was collected in the week following the May half-term week, and therefore may not be fully representative of the volatile and quirky nature of the travel by the users of a tourist industry.

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AADT may not be the best metric for a destination that relies on tourism and leisure. There will be peaks when one of the many festivals that Aldeburgh hosts is taking place.

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Again, it depends on when the traffic counts were done. As mentioned previously, there are peaks and troughs in travel along the A1094.

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As mentioned in REP8 – 236, there is a question mark over the classification of vehicles gathered by the SPR data; in some cases there were significantly more LGVs going one way than the other, and vice-versa for cars. The total vehicle movement however was almost the same.

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The graphs in REP8 – 236 illustrate the contention that the A1094 does not follow a normal traffic density variation throughout the day. Fig 2, the data gathered by SPR, is not similar to the UK average shown in Fig 3, and closely resembles the data gathered by the SID at Snape as shown in Fig 4.

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There is significant evidence that the majority of tourists are those returning to the same destination. If conditions for travel are inconvenient, tourists may well transfer their loyalty to a new location.

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The Tourism Impact review in REP1 – 102 does not compare like with like. Mention has been made in REP5 – 113 that the road layout in North Norfolk bears no resemblance to that for Aldeburgh. The other example that is detailed in REP1 – 102 also does not have any similarity to this proposal; the substation at Twineham is well-served by the A23 dual carriageway that connects to other dual carriageways and motorways, so any construction traffic would hardly affect tourist traffic. This example also illustrates that there is no need for the offshore windfarm to be that near the onshore substation; my estimate is that Worthing is some 12 miles as the crow flies from Twineham; this is about the same distance from shore to Bramford for East Anglia ONE. The argument in my submission is that the extra traffic on the A1094, because it is the main road into Aldeburgh, will affect Aldeburgh tourism. Using sites situated in other AONBs is not a fair comparison, because they do not replicate the reliance of one road for access.

There are other sites mentioned in REP1 – 102, but there is no detail about their location and the road access around the onshore construction sites. I have located one — Westermost Rough, east of Hull with a substation at Salt End. Landfall at Withernsea is on the coast, but one would hardly call it a touristic location; may be a few holiday homes, may be a few shops, but nothing comparable in extent to that at Aldeburgh and Thorpeness. I find it odd that such a location could be used as a comparison.

2 Reply to REP6 – 064, ExQ2.17.9

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I find this comment specious. The DMO report does consider both SZC and the SPR, but it does also distinguish between the two at times, e.g. page 72, where it is shown that the effect on East Suffolk tourism from the SPR substation is only marginally less damaging than that due to SZC. To neglect the information in this report on the basis that it considers the effect of both SZC and SPR is convenient, but incorrect. What the DMO report shows is that the construction of a large installation will adversely affect tourist destinations, both during the construction phase and thereafter.

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SZC is a separate issue altogether, and comparing these Projects with SZC is not relevant.

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Mention has been made of tourist loyalty, and that when tourists seek alternative destinations then their loyalty may change.

Bullet point 1 This is a surprising, and I think disingenuous, criticism. The Applicants have used the Type I values, 1.7, for the *Rest of England* from the Deloitte report, whereas I have used the Type II values, 2.0, for the *Rest of England* from the same report.

From the report, the definition of Type II is: *which, in addition to direct and indirect effects, captures the effects of spending by employees (induced effects) — i.e. it is the ratio of direct plus indirect plus induced to the direct effects. Type II multiplier takes into account, in addition to direct and indirect effects, the extra activities generated within the economy through the expenditure made by employees in a particular sector.*

The Type II multiplier is more appropriate in this context.

Bullet point 2 I have not been able to check this data, although I have tried.

Conclusion

The justifications and arguments made by the Applicants in their submission show a lack of judgement in extrapolating the effects on tourism from existing windfarm onshore substations onto the very singular road access into Aldeburgh and Thorpeness; only comparison with another site which has a similar road access to it will be relevant. There is no evidence supplied by the Applicants that Aldeburgh and Thorpeness will not suffer as a consequence of their application, both during construction and in the long-term.