

East Anglia TWO Offshore Windfarm

Appendix 30.1

Tourism, Recreation and Socio- Economics Consultation Responses

Environmental Statement Volume 3

Applicant: East Anglia TWO Limited
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Table A30.1	Consultation Responses

Glossary of Acronyms

AONB	Area of Outstanding Natural Beauty
BOAT	Byway Open to All Traffic
CCS	Construction Consolidation Site
CoCP	Code of Construction Practice
CIA	Cumulative Impact Assessment
CMS	Construction Method Statement
cSAC	candidate Special Areas of Conservation
CTMP	Construction Traffic Management Plan
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
Defra	Department for Environment, Food & Rural Affairs
DfT	Department for Transport
DMO	Destination Management Organisation
EEA	European Economic Area
EEEGR	East of England Energy Group
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESC	East Suffolk Council
ETG	Expert Topic Group
FTE	Full Time Equivalent jobs per year
FTE Year	Full Time Equivalent jobs over the duration of the project
GSS	Government Statistical Service
GVA	Gross Value Added
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
IAIA	International Association for Impact Assessment
IEMA	Institution of Environmental Management and Assessment
IMD	Indices of Multiple deprivation
IOI	Intervention or Investment
IRTS	International Recommendations on Tourism Statistics
JSA	Jobs Seekers Allowance
km	Kilometre
LEP	Local Enterprise Partnership
LPA	Local Planning Authority
LSOA	Lower Super Output Area
MoU	Memorandum of Understanding
MSOA	Middle Super Output Area
NALEP	New Anglia LEP
NCC	Norfolk County Council
NCTA	National Coastal Tourism Academy
NOMIS	NOMIS – a branch of ONS where the acronym has been dropped
NPPF	National Planning Policy Framework
NPS	National Policy Statement

NSIP	Nationally Significant Infrastructure Project
NUTS	Nomenclature of Territorial Units for Statistics
NVQ	National Vocational Qualifications
O&M	Operation and Maintenance
OLMP	Outline Landscape Mitigation Plan
ONS	Office for National Statistics
PEI	Preliminary Environmental Information
PEIR	Preliminary Environmental Information Report
PID	Public Information Day
PRoW	Public Right of Way
ROWIP	Right of Way Improvement Plan
SAC	Special Area of Conservation
SCC	Suffolk County Council
SCI	Sites of Community Importance
SCDC	Suffolk Coastal District Council
SIC	Standard Industrial Classification
SoC	Secretary of State
SPA	Special Protection Area
SPR	ScottishPower Renewables
SSSI	Site of Special Scientific Interest
STEM	Science, Technology, Engineering, and Math
UK	United Kingdom
UNWTO	United Nations World Tourism Organisation
WCS	Worst Case Scenario
WDC	Waveney District Council

Glossary of Terminology

Applicant	East Anglia TWO Limited.
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include 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 fencing or other means of enclosure.
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 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.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be 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 (cSAC), Sites of Community Importance (SCI), Special Areas of Conservation (SAC) and Special Protection Areas (SPA).
FTE	Full Time Equivalence is the number of jobs that would be sustained if all of the people were employed full time for a defined period of time. This assessment uses one year as the standard period of time. For example: if 20 people worked for half a year each that would be equivalent to 10 full time jobs – 10 FTE. Whereas if 10 people worked full time for a year that would still be 10 FTE.
FTE Year	Full Time Equivalent years is the sum of FTE per year over the duration of a project. If a project had an annual FTE of 10 for 5 years then it would sustain 50 FTE Years. This is an important concept when calculating regional value as a high employment for a short term could have the same number of FTE Years as a low employment over a long term.
Gross Domestic Product (GDP)	A measure of the total value of market goods produced and services provided in the country in one year. It should be noted that GDP was developed to measure the market production of a nation and, as such, does

	not capture the value from non-market goods such as services provided by nature and non-salaried services provided by households.
Gross Value Added (GVA)	A measure of the value of goods and services produced in an area, industry or sector of an economy. It is a component of GDP growth and, similarly, does not capture value added from non-market goods such as services provided by nature and non-salaried services provided by households.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
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.
Local Enterprise Partnerships (LEPs)	Voluntary partnerships between local authorities and businesses set up in 2011 by the Department for Business, Innovation and Skills to help determine local economic priorities and lead economic growth and job creation within the local area.
Lower Super Output Areas (LSOAs) and Middle Super Output Areas (MSOAs)	LSOAs and MSOAs are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales following the 2001 Census. These are built from groups of contiguous Output Areas and have been automatically generated by the Office for National Statistics. LSOAs have a population of 1,000 to 3,000 and from 400 to 1,200 households. MSOAs have a population of 5,000 to 15,000 and from 2,000 to 6,000 households.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
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 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 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 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.
New Anglia LEP	New Anglia Local Enterprise Partnership which works with businesses, local authority partners and education institutions across the counties of Norfolk and Suffolk.
Nomenclature of Territorial Units for Statistics	Nomenclature of Territorial Units for Statistics (NUTS) are statistical divisions of areas of the United Kingdom (UK) based on population. Within the UK, NUTS1 is generally regional. NUTS2 is generally at a county level. NUTS3 is generally at a grouped local authority and district level.
Non-market goods	Most environmental goods and services, such as clean air and water, and healthy fish and wildlife populations, are not traded in markets. Their economic value (i.e. how much people would be willing to pay for them) and societal value (i.e. how much they contribute to society) is not captured in market prices.
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 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 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 project.
Productivity	Productivity is an economic measure of output per unit of input. Inputs include labour and capital, while output is typically measured in revenues and other gross domestic product components such as business inventories.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.

30.1 Tourism, Recreation and Socio-Economics Consultation Responses

30.1 Introduction

1. This appendix to **Chapter 30 Tourism, Recreation and Socio-Economics** covers those statutory consultation responses that have been received as a response to the Scoping Report (SPR 2017), the Preliminary Environmental Information Report (PEIR) (SPR 2019) and Expert Topic Group (ETG) Meetings.
2. Responses from stakeholders and regard given by the Applicant have been captured in **Table A30.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

Table A30.1 Consultation Responses Related to Chapter 30 Tourism, Recreation and Socio-Economics

Consultee	Date/ Document	Comment	Response / where addressed in the ES
<p>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.</p>			
SCC and SCDC	08/12/2017 Scoping Response	Closures to the beach and the Suffolk Coast Path must be minimised as Sizewell beach is well used by fishermen and dog walkers and recreationally. Any closures would be resisted unless temporary and for essential health and safety justification.	The Applicant is committed to Horizontal Directional Drilling (HDD) which removes the need for any beach closures. This is discussed in section 30.6.1.4 of this chapter and detailed further in Chapter 6 Project Description .
SCC and SCDC	08/12/2017 Scoping Response	We would suggest that an additional document having regard to skills is required as well as a proper assessment in relation to tourism impacts of the proposed East Anglia TWO project during construction and operational phases.	The proposed East Anglia TWO project will continue implementing the Skills Strategy that has been agreed by Memorandum of Understanding (MoU) with Suffolk County Council (SCC), as described in section 30.3.3.1 of this chapter. Employment opportunity is discussed in sections 30.6.1.1, 30.6.1.2 and 30.6.2.1 of this chapter
SCC and SCDC	08/12/2017 Scoping Response	The mitigation hierarchy should be implemented – compensation may well be required if mitigation of adverse effects is not possible. Scoping should include and consider impacts of offshore windfarms on the typical AONB visitor experience – knowledge of the construction work could be damaging for those many visitors who value the unique Suffolk experience.	Mitigation of impact determinants for visitors is discussed in relevant chapters. This is described in section 30.6.1.4 and 30.6.2.2 of this chapter.
SCC and SCDC	08/12/2017 Scoping Response	Scoping refers to the 3km buffer beyond the onshore study area, having regard to tourism impacts this may not be large enough. Given the size of the substations proposed in the sensitive landscape this may well need to be extended in order to assess fully impacts in relation to tourism in the vicinity.	Potential long-term tourism impacts due to the presence of onshore substations are discussed in section 30.6.2.2 of this chapter.

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
SCC and SCDC	08/12/2017 Scoping Response	The timing of the construction period and the potential for any crossover / in combination impacts with the construction of Sizewell C will be critical from a tourism perspective and in relation to availability of skills and construction / workforce capacity – this is a risk that needs to be investigated and mitigated.	Cumulative impacts are considered in section 30.7 of this chapter.
SCC and SCDC	08/12/2017 Scoping Response	It appears that impacts on tourism generally are effectively dismissed in one sentence of the Scoping Report – this is not acceptable. There needs to be properly researched, evidence and analysis of the current visitor economy and the potential impacts of disruptive construction projects in the area. There needs to be current research, local visitor surveys and a proper understanding of the importance of tourism to the local economy via up to date data collection and analysis in addition to that proposed.	The Scoping Report contained separate detailed sections for socio-economic and tourism impacts. The tourism and hospitality economy is a sub-section of the wider economy (as defined by the Office for National Statistics (ONS)) and as such both elements are considered in section 30.6 of this chapter.
SCC and SCDC	08/12/2017 Scoping Response	The following should be added to the skills/training section of the impacts assessment; education, construction works, impact on local residents and the cumulative impacts with other projects.	Employment and tourism impacts are discussed in section 30.6 of this chapter. Cumulative impacts are discussed in section 30.7 of this chapter. Impacts to local communities are considered in Chapter 27 Human Health .
SCC and SCDC	08/12/2017 Scoping Response	There is potential to need more mitigation than just the skills strategy from EA ONE being updated – there will be other developments running concurrently with this development, putting pressure on the existing (low) workforce and the impact on tourism from the two offshore windfarm projects proposed is likely to be significant and require mitigation / compensation.	Employment and tourism impacts are discussed in section 30.6 of this chapter. Cumulative impacts are discussed in section 30.7 of this chapter.
SCC and SCDC	08/12/2017 Scoping Response	The PEI needs to be more specific on what SPR are planning to do about impacts on national and regional supply chains than the Scoping Report.	Employment opportunity is discussed in sections 30.6.1.1, 30.6.1.2 and 30.6.2.1 of this chapter.

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
Norfolk County Council (NCC)	01/11/2017 Scoping Response	The PEI will need to address the impact of the windfarm on tourism, including tourism occurring in neighbouring counties, which may be affected if the natural landscape is altered sufficiently.	Tourism impacts are described in section 30.6.1.4 and 30.6.2.2 of this chapter.
NCC	01/11/2017 Scoping Response	The PEI should consider the likely impacts on Norfolk's tourism sector	Tourism impacts are described in sections 30.6.1.4 and 30.6.2.2 of this chapter.
NCC	01/11/2017 Scoping Response	It would be helpful if the PEI could provide accurate figures of those likely to be employed both during construction and once the WF is fully operational. There should also be a statement as to whether the labour would be sourced from local firms or if expertise would need to be imported to the region.	Employment opportunity is discussed in sections 30.6.1.1, 30.6.1.2 and 30.6.2.1 of this chapter.
Natural England	08/12/2017 Scoping Response	Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.	These potential impacts are described in section 30.6.1.4 of this chapter.
Natural England	08/12/2017 Scoping Response	The PEI should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.	These potential impacts are described in section 30.6.1.4 of this chapter.

Consultee	Date/ Document	Comment	Response / where addressed in the ES
The Planning Inspectorate	20/12/2017 Scoping Response	The PEI should set out the sources of data used to inform the baseline and the dates that the data was gathered and last updated.	Sources of data are set out in section 30.4.2 of this chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	Where information is cross-referenced within the PEI, it should be made clear how the conclusions from other aspect assessments have informed the tourism and recreation assessment.	Section 30.4.4 of this chapter sets out a clear methodology for impact assessment that is used in section 30.6 of this chapter to assess impacts. In general, residual impacts of determinants of physical disturbance are used from corresponding chapters. Chapter 27 Human Health provides a similar methodology to assess impacts to local communities.
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report does not set out the methodology for the assessment and as such, the Inspectorate is unable to comment. The methodology should be discussed and agreed with relevant consultees.	Section 30.4.4 of this chapter sets out a methodology for impact assessment that is used in section 30.6 of this chapter to assess impacts. Chapter 27 Human Health provides a similar methodology to assess impacts to local communities. Both methodologies have been discussed and agreed with relevant stakeholders via the ETG.
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report does not set out a study area for the assessment; the PEI should describe a study area and provide justification.	The study area is set out in section 30.3.1 of this chapter and further developed in section 30.5 of this chapter.
The Planning Inspectorate	20/12/2017 Scoping Response	The Scoping Report does not indicate that the socio-economic assessment will be cross-referenced with other aspect chapters. The Inspectorate considers that cross-referencing enables a thorough assessment and should be followed where necessary. Any social-economic impacts, to the AONB for example, should be assessed.	Table 30.67 of section 30.6.1.4 of this chapter sets out where other aspects of chapters are used to inform the assessment.

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Consultee	Date/ Document	Comment	Response / where addressed in the ES
The Planning Inspectorate	20/12/2017 Scoping Response	The assessment should include consideration of the types of jobs generated by the Proposed Development in the context of the available skills and workforce in the area; this applies equally to both construction and operational stages. The assessment should be carried out in consultation with the local authorities and Local Enterprise Partnership (LEP) to ensure that the data used is up-to-date.	The assessment uses labour market statistics provided by NOMIS (section 30.5.1 and 30.5.2 of this chapter) to inform section 30.6 of this chapter.
Expert Topic Group (ETG)	12/06/2018 ETG Meeting	ETG agree on baseline data sources presented in the Method Statement but with the request that visitor surveys are undertaken and data used in the baseline.	A meta-study of visitor surveys (Appendix 30.2) and a survey of independent reviews of coastal attractions with a view of offshore windfarms have been used to understand visitor impression in section 30.6.2.2 of this chapter.
Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) - AONB Manager	12/06/2018 ETG Meeting	Requested that visitors were considered separately to local populations although accepted that as both are human populations the pathway from determinant sources to impacts would be similar.	The potential impacts to local populations have been moved to Chapter 27 Human Health and potential impacts to visitors have been considered in section 30.6 of this chapter.
Suffolk Destination Management Organisation (DMO) – Chair of DMO	12/06/2018 ETG Meeting	Raised that the impact assessment must consider the disparity of wider benefits and local impacts, particularly relating to onshore infrastructure	Section 30.6 of this chapter includes assessments at a local, regional, and national level.
	12/06/2018 ETG Meeting	“Perception” impact not covered in the Method Statement. Request that consideration should be given to the impact on the perception of Suffolk as a tourist destination to those who either do or do not currently come to Suffolk as a holiday/tourist destination.	Perception has been considered in section 30.6.2.2 of this chapter by including independent research and a survey of coastal tourism reviews for their stated opinion about offshore wind.
SCDC - Planning Case Officer	12/06/2018 ETG Meeting	Concern is ensuring the region has the skill set required to take advantage of the job creation.	The Applicant and SCC have agreed a MoU to promote career opportunities in the offshore wind sector, as described in section 30.3.3.1 of this chapter.

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			Qualification levels have been considered in section 30.5 of this chapter to inform the assessment in section 30.6 of this chapter.
NCC Economic Development Team	12/06/2018 ETG Meeting	Recent studies in Norfolk on tourism following construction of offshore windfarms should be referenced in the assessment.	Noted. The most recent data available at the time of writing has been used to inform the assessment presented in this chapter.
SCC - Economic Development Team	12/06/2018 ETG Meeting	Asks if the 'Inclusive Growth Tool' will be considered in the assessment.	The Metro Dynamics Inclusive Growth Tool was reviewed following the ETG. The tool is important in public sector expenditure but not directly applicable to private investments that do not have a specific objective of social improvement. The Sustainable Communities Framework and wide range of impacts assessed do cover a variety of socio-economic groups. Furthermore, the Applicant and SCC have agreed an MoU to promote career opportunities in the offshore wind sector, as described in section 30.3.3.1 of this chapter.
AONB and Suffolk DMO	24/01/2019 ETG Meeting	A reputation as a holiday destination is hard won and easily lost, and Suffolk is working hard to build its reputation.	Impacts to tourism receptors have been assessed in sections 30.6.1.3, 30.6.1.4 and 30.6.2.2 of this chapter. The results of the assessment were negligible tourism disturbance and long term impacts, and major beneficial short term impacts. Perception of change to the area is also assessed in section 30.6.1.4 of this chapter.
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	Suffolk Coastal and Waveney District Council suggest that SPR could have a strategy boosting the local economy and ensure that SPR are investing in local communities.	A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the

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			skills environment required for the proposed East Anglia TWO project.
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	There should be a strategy to deal with construction working conflicting with EDF	Project conflicting with the proposed East Anglia TWO project is detailed in section 30.7 of this chapter.
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	In regard to East Anglia ONE construction, has any monitoring of where construction workers are staying and type of accommodation they are staying in etc. been done? If so, can this data be used in future assessment?	No monitoring has been undertaken on worker accommodation.
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	The next stage of work needs to consider SLVIA receptors targeted for those tourism receptors that could potentially be affected. Cross-reference with SLVIA following PEIR to identify those specific locations and potential businesses that could be affected by the offshore wind farm.	Locations where East Anglia TWO will be visible from the shore have been identified in Chapter 28 Offshore Seascape, Landscape and Visual Amenity .
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	EDF are undertaking tourism surveys. SPR should review their methodology and content and look to share data where relevant.	Data sharing will take place where appropriate.
Suffolk Coastal and Waveney District Councils	24/01/2019 ETG Meeting	It was noted that data presented in terms of job creation, increase in economy and visitor numbers is based on that generated by the project and is not a 'net' figure and does not account for the any reduction in visitors/tourists	Impacts to tourism receptors have been assessed in sections 30.6.1.3, 30.6.1.4 and 30.6.2.2 of this chapter. The potential adverse impacts have been assessed as negligible , as such potential reductions in visitor numbers have not been modelled.
The following comments were made in response to the PEIR and were taken into account in the production of the ES.			

Consultee	Date/ Document	Comment	Response / where addressed in the ES
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Response	<p>The AONB Partnership have concern about the impact on the nationally designated AONB during the construction phase of the installation of the cables.</p> <p>In particular it raises concern about impacts on the enjoyment of the AONB and tourism industry. The construction of the cable routes has the potential to negatively impact the ability of residents and visitors to enjoy the AONB.</p>	<p>Chapter 29 Landscape and Visual Impact Assessment defines the AONB baseline.</p> <p>Chapter 28 Offshore Seascape, Landscape and Visual Amenity details potential visual impacts which may impact tourism.</p> <p>The effect on tourism, which includes the effect on tourism within the AONB, during construction and long term is assessed in sections 30.6.1.4 and 30.6.2.2 of this chapter.</p> <p>Enjoyment and impacts on wellbeing are discussed in Chapter 27 Human Health.</p>
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Response	<p>The tourism business in the AONB, worth £210m and supporting 4,655 jobs, is based to a large degree on quiet informal recreation in the countryside, walking and cycling, and enjoyment of landscapes, wildlife and cultural experiences. The proposals are likely to have a negative impact on the tourism industry during the construction period and the perception of those considering a visit to the area.</p>	<p>Effects on tourism and hospitality businesses are considered in sections 30.6.1.3 and 30.6.2.2 of this chapter. The effect on tourism based on recreation and amenity impacts, is assessed in sections 30.6.1.4 and 30.6.2.2 of this chapter.</p>
Suffolk Coast and Heath AONB Partnership	25/03/2019 Section 42 Response	<p>ScottishPower Renewables should fully acknowledge the likely impacts of the proposals on the enjoyment of the AONB and the economic benefits associated with that enjoyment.</p> <p>Robust research in this area is required beyond an analysis of 'Trip Advisor' comments in other locations with offshore wind turbines. This needs to assess the impacts of the construction phase, operation phase and perceptions of the Suffolk Coast of those that would consider a visit.</p> <p>ScottishPower Renewables should seek to avoid, minimise, mitigate and compensate for any adverse impacts on the tourism industry. This could be done</p>	<p>The Applicant recognises the importance of the AONB to the tourism industry (section 30.5). Potential impacts on tourism are detailed in sections 30.6.1.4 and 30.6.2.2 of this chapter.</p> <p>The robustness of the Trip Advisor study is detailed in section 30.5.3.3 of this chapter as are the results. The Trip Advisor study was conducted to supplement other independent studies, included in section 30.5.3.3 of this chapter and Appendix 30.2.</p> <p>Embedded mitigation measures are included in section 30.3.3.2 of this chapter. Mitigation</p>

Consultee	Date/ Document	Comment	Response / where addressed in the ES
		through support of Suffolk Coast Limited, a Destination Management Organisation.	measures (including use of best practice guidance) to minimise or avoid adverse impacts to the tourism industry are also detailed in Chapter 19 Air Quality, section 19.3.4, Chapter 25 Noise and Vibration, section 25.3.3, Chapter 26 Traffic and Transport, section 26.3.3, Chapter 28 Offshore Seascape, Landscape and Visual Amenity, section 28.3.3 and Chapter 29 Landscape and Visual Impact Assessment, section 29.3.3
Suffolk Preservation Society	20/03/2019 Section 42 Response	The Suffolk Coast and Heaths AONB and the Heritage Coast is one of the most important parts of Suffolk, from a landscape and natural beauty perspective but also plays a vital economic role. The total tourism value in the AONB was over £210 million pounds, with a total of 4 million visitor trips (day and staying) and total tourism related employment standing at 4655 jobs, which is significant in a predominantly rural county (Economic Impact of Tourism in the Suffolk Coast and Heaths AONB 2017). The proposals would have a significant and harmful impact on the value of the AONB to many of its residents and businesses (who trade on the natural beauty and special qualities of the area).	Noted. The presence of the AONB was a key consideration in site selection and siting for the onshore substation. Chapter 4 Site Selection and Assessment of Alternatives discusses how the AONB was factored into decision making, including consideration of the AONB special qualities. Since PEIR, further refinement to the East Anglia TWO windfarm site boundary has been undertaken. The north-south extent of the East Anglia TWO windfarm site has therefore been reduced (see Chapter 4 Site Selection and Assessment of Alternatives, section 4.6 and Figure 4.3) in order to mitigate potential seascape impacts upon the AONB, without a reduction in wind turbine numbers or generation capacity.
Public Health England	26/03/2019 Section 42 Response	The assessment of cumulative impact should be reviewed using the latest PEIR from Sizewell C. Particular attention should be given to Accommodation demands affecting tourist accommodation, housing	The Cumulative Impact Assessment (CIA) has been updated where possible using the latest

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		affordability and availability including the private rented/social housing sector. The applicant should consider the nearby development of Sizewell C, assess the cumulative implications on the proposed East Anglia TWO and ensure assessments and mitigation measures are consistent and interoperable.	<p>information from EDF Energy. The updated CIA is presented in section 30.7.2 of this chapter.</p> <p>It should be noted that EDF Energy propose to submit a Stage 4 consultation document prior to the submission of an ES in early 2020. The proposed publication date of the EDF Energy Stage 4 material mean it is unable to be incorporated into the proposed East Anglia TWO project CIA. Recognising that EDF Energy are proposing further changes to some of their proposals (in particular transport strategies) a detailed CIA based upon Stage 3 materials would potentially be based upon out of date and incorrect information and furthermore, could prejudice EDF Energy's Stage 4 consultation.</p> <p>House prices are outwith the scope of this assessment.</p>
Public Health England	26/03/2019 Section 42 Response	Socio-economics is a wider determinant of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether it is likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing, which has been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements.	Interrelationships between Tourism, Recreation and Socio-economics and other wider determinants of health are detailed in section 30.8 of this chapter.
Public Health England	26/03/2019 Section 42 Response	The PEIR identifies how non-motorised user (NMU) will be impacted through the loss or change in formal Public Rights of Way (PRoW), open space and the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long term impact where possible. Changes to NMU routes have the potential to	<p>Impacts to non-motorised users are addressed in sections 30.6.1.4.2.1, 30.6.2.2 of this chapter and Chapter 26 Traffic and Transport.</p> <p>The associated potential impacts to non-motorised users' health are discussed in section 27.5.5 of Chapter 27 Human Health.</p>

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		<p>impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions. The PEIR does not provide any data for NMU within the traffic assessments. Without such data it is unclear how the impact on NMU (pedestrians and cyclists) from the presence of large numbers of HGVs can be assessed.</p> <p>Similarly no data has been presented on the usage of each PRoW affected by the scheme, nor does it identify the specific impact and mitigation to be put in place for each PRoW, for example through diversions. Diverted routes must be designed, installed and maintained to allow for access to the community.</p> <p>A scheme of this scale and nature can also provide mitigation opportunities to enhance the existing infrastructure that supports active travel, physical activity and access to green/blue space. We expect the proposal to contribute to improved provision of infrastructure that supports this type of activity.</p>	<p>An Outline PRoW strategy (OPRoWS) (document reference 8.4) has been developed which details any diverted routes and associated mitigation measures.</p>
Public Health England	26/03/2019 Section 42 Response	<p>Any assessment of PRoW, green or blue spaces accessible by the community must be considered on a case by case basis, taking into account, the number and type of users and the effect of the scheme. Where mitigation measures are required, e.g. temporary diversions, these must be identified and reported in the ES. Any temporary diversions must be designed to maximise continued usage and minimise perceived or actual barriers to access. The scheme should continue to identify any additional opportunities to contribute to improved infrastructure provision for active travel and physical activity. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Any new or restored green / open space</p>	<p>Any changes or diversions to Public Rights of Way (PRoW) are detailed in the OPRoWS, as are mitigation and enhancement measures (document reference 8.4)</p>

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		and PRow should be sited and designed to ensure access across the life course and account for the uneven distribution across communities. The mitigation plans should identify the design principles or standards that will be adopted and any support for community engagement to promote use of these assets to local communities.	
Waveney District Council	26/03/2019 Section 42 Response	<p>It is appreciated that the turbines themselves will be limited in the time of when they will be visible from shore and that the proposed 300m height to tip is currently an aspiration and not actually available technology at this stage. However, EA2 is closer to the shore than the existing East Anglia One (EA1) and consented East Anglia Three (EA3) arrays that have maximum turbine heights of 250m. As such, the potential impacts arising from EA2 are greater.</p> <p>We would be happy to discuss the potential for mitigation of these impacts as it is likely they will most greatly be felt during peak tourist season, this is a concern particularly around Kessingland, Covehithe and Southwold where tourism and the coast are a massive draw to visitors, holiday makers and second-homeowners. Mitigation could include a reduction in the height of the turbines or alterations to the layout of the arrays to minimise impacts. We would welcome discussions as part of East Suffolk Council on this element.</p>	<p>Both visual impacts to the seascape from the shore and the associated mitigation measures, are addressed in full in Chapter 28 Offshore Seascape, Landscape and Visual Amenity.</p> <p>Since PEIR, further refinement to the East Anglia TWO windfarm site boundary has been undertaken. The north-south extent of the East Anglia TWO windfarm site has therefore been reduced (see Chapter 4 Site Selection and Assessment of Alternatives, section 4.6 and Figure 4.3) in order to mitigate potential seascape impacts, without a reduction in wind turbine numbers or generation capacity. The boundary is now 3km further from Covehithe and 2km further from Southwold when compared to the PEIR boundary.</p> <p>Residual impacts range from negligible to minor/moderate, and as such potential tourism, recreation and socio-economic impacts will also vary.</p>
Waveney District Council	26/03/2019 Section 42 Response	Impact on tourism and recreation resulting from landscape and seascape impacts during the construction and operation phases along with associated mitigation strategies is an area we are particularly concerned with and look forward to being	<p>Visual impacts are assessed in both Chapter 28 Offshore Seascape, Landscape and Visual Amenity and Chapter 29 Landscape and Visual Impact Assessment.</p> <p>Residual visual impacts range from negligible to minor/moderate adverse, and as such potential</p>

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		involved in discussions prior to the development consent orders being submitted.	tourism, recreation and socio-economic impacts will also vary. Impacts to tourism and recreation amenity are considered further in sections 30.6.1.4 and 30.6.2.2 of this chapter.
Waveney District Council	26/03/2019 Section 42 Response	<p>From a socio-economic perspective we are supportive of aspiration to improve opportunities in the local area by looking at issues, assumptions and predictions on labour displacement effects, current skills shortages and mitigation strategies proposed. We expect you to build upon the existing Skills Strategy associated with Scottish Power/Iberdrola and the East Anglia One and East Anglia Three offshore windfarms.</p> <p>However, we are concerned that the positive benefits and economic potential the two developments can bring to our local area are not currently being highlighted, for example reference to the potential for positive impacts on the supply chain both regionally and locally does not include any targets to achieve these benefits.</p>	<p>Noted.</p> <p>Positive benefits to date from East Anglia ONE are highlighted in Chapter 2 Need for the Project, section 2.4.</p> <p>A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the skills environment required for the proposed East Anglia TWO project.</p> <p>Supply chain targets are not being created at this time. A supply chain plan will be developed post-consent (see section 30.3.3.2 of this chapter).</p>
Waveney District Council	26/03/2019 Section 42 Response	You suggest that local tourist accommodation businesses will benefit because non-home based workers will use spare capacity in the off-peak tourist season but you do not explain how this impact will be mitigated if non-home based workers are using tourist accommodation and preventing visitors from staying in the local area during peak season or where these workers will be accommodated if they are evicted from tourist accommodation in the peak season.	The worst case assessed for accommodation impacts in section 30.6.1.3 of this chapter considers a scenario whereby the peak number of non-residential workers occurs during peak tourism season. This shows that non-residential workers from the proposed East Anglia TWO project will only take up 47% of the rooms available assuming 80% occupancy from visitors (see Table 30.63 and Table 30.64 of this chapter). Therefore, as assessed, non-resident

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			workers will provide a benefit by using extra capacity but will not displace tourists.
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	It should be noted that although the potential benefits of the proposed developments will be widely felt across Suffolk and beyond, the negative impacts requiring significant mitigation will be very locally felt in the area of East Suffolk where the development is focussed and we will expect to see this positively mitigated by SPR. The consultation documents go into considerable detail explaining the framework, design, definition, content and methods of data analysis used to inform the work produced, but they do not show how this analysis translates into real, tangible economic benefits both locally, and regionally. SPR quantify in some detail the employment multiplier effects and benefits that will be felt more widely, whilst dismissing the negative worker and supply chain displacement effects, along with tourism, recreation and accommodation impacts that will be felt locally.	<p>The Applicant has partnered with SCC and other industry stakeholders to engage local suppliers and enabled a local supply chain as far practicable (section 30.6.1.1.4 of this chapter). Employment opportunities are further enhanced by continuity between multiple projects being developed by SPR and supported by Skills Strategy that includes an MoU with SCC.</p> <p>The magnitude of both local and wider employment is discussed in sections 30.6.1.1.2 and 30.6.2.1.2 2 of this chapter, based on the current businesses which are capable fulfilling the supply chain needs within the area.</p>
Waveney District Council	26/03/2019 Section 42 Response	It is not considered that you fully consider the cumulative impact of a number of projects going ahead in the same timeframe (EA1N, EA2, EDF Energy Sizewell C, and National Grid Interconnectors alongside local infrastructure projects in the New Anglia Local Enterprise Partnership area). Due to the negative impact that will be felt in terms of employment displacement and tourism we would expect to see SPR seek to mitigate these impacts and where this cannot be done we expect SPR to propose mitigation funds for tourism, housing, communities etc.	<p>The CIA has been updated with the latest information for Sizewell C New Nuclear Power Station in section 30.7 of this chapter. The National Grid Interconnectors have not been screened in to the CIA as there is insufficient information on these projects to undertake assessment. The list of projects screened into the CIA has been developed in consultation with the Local Planning Authorities.</p> <p>Based upon the assessment in sections 30.6.1.1.2 and 30.6.2.1.2 of this chapter, it is concluded that there will be no employment displacement. Based upon the assessment in sections 30.6.1.3, 30.6.1.4, 30.6.2.2 and 30.6.4 of this chapter, it is considered that there are no</p>

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			significant adverse impacts upon tourism and recreation receptors either for the proposed East Anglia TWO project alone or cumulatively with the proposed East Anglia ONE North project. Mitigation is therefore only proposed for contributors to potential impact (e.g. air quality, noise and traffic mitigations).
Waveney District Council	26/03/2019 Section 42 Response	Without additional mitigation, evidence suggests that local economic benefits will be lower than anticipated whilst negative effects such as displacement are likely to be greater. It is therefore essential that we seek from you early agreement of a robust and properly resourced mitigation plan to increase local economic benefits and reduce negative effects.	<p>Economic benefit would derive from construction employment (plus indirect and induced employment) and benefit to the tourism and hospitality sector (as discussed in sections 30.6.1.1, 30.6.1.2 and 30.6.1.3 of this chapter). Labour displacement is not considered to be significant, given the low magnitude of effect (see Table 30.53) and temporary nature of construction work in general.</p> <p>Potential negative effects during construction would come from disturbance to tourism and recreation assets (see section 30.6.1.4 of this chapter) which are each mitigated (i.e. effects on traffic, air quality, noise etc) to avoid significant impact. The longer term effects upon tourism are not considered significant, however, following feedback on offshore seascape effects further refinement to the East Anglia TWO windfarm site boundary has been undertaken in order to mitigate potential seascape impacts, without a reduction in wind turbine numbers or generation capacity (see Chapter 4 Site Selection and Assessment of Alternatives, section 4.6 and Figure 4.3)</p>
Waveney District Council	26/03/2019	We expect you to develop clearly defined partnership strategies focussed on potential areas of economic benefit, such as, inward investment and supply chain	A supply chain plan will be developed post-consent in advance of the Contracts for

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	Section 42 Response	development alongside developing innovative schemes to encourage non home based workers to spend money with local retailers.	Difference (CfD) process (see section 30.3.3.2 of this chapter).
Waveney District Council	26/03/2019 Section 42 Response	SPR implies as part of their estimated home based/non home based workforce split that there are sufficient workers with the requisite skills based either locally or regionally. It does not reference the fact that these identified workers are probably currently employed meaning that there will be significant displacement of these workers from existing jobs, businesses and the supply chain that will clearly impact negatively on the local economy. For example, you quote that 16,545 appropriately skilled workers exist locally but they do not say that they are all currently employed elsewhere.	<p>Employment opportunity is discussed in sections 30.6.1.1, 30.6.1.2 and 30.6.2.1 of this chapter.</p> <p>Details of the potential labour market are included in section 30.6.1.1.1 of this chapter. Current levels of unemployment within the travel to work area are included in section 30.5.2.4 of this chapter and current economic inactivity levels are included in section 30.5.2.1 of this chapter.</p> <p>Construction employment is by its nature temporary, as one project finishes workers move to another. As such, currently employed personnel may become available to work on the proposed East Anglia TWO project throughout the duration of the construction period. In addition, onshore construction employment will have a low magnitude of effect (see Table 30.53) Therefore, labour displacement is not likely to be an issue.</p>
Waveney District Council	26/03/2019 Section 42 Response	To maximise the benefits of the projects in the local area, there needs to be a strong and proactive partnership between SPR, the local Councils and other stakeholder bodies including New Anglia Local Enterprise Partnership (NALEP) and the Suffolk Chamber of Commerce. SPR is equally expected to work with these stakeholders to minimise negative economic impacts on local communities and the local and regional economy. This includes defining mitigation measures to be included in the final DCOs.	A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the skills environment required for the proposed East Anglia TWO project.

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Waveney District Council	26/03/2019 Section 42 Response	We expect to see a clear, realistic, positive mitigation strategy with key targets and ranges for financial investment that you are proposing for each economic area affected, including skills, tourism, supply chain etc. We need to have greater understanding of and further discussion on the intent and scale of investment from SPR.	A supply chain plan will be developed post-consent in advance of the CfD process (see section 30.3.3.2 of this chapter) Positive benefits to date from East Anglia ONE are highlighted in Chapter 2 Need for the Project, section 2.4 , including the long term investment in Lowestoft
Waveney District Council	26/03/2019 Section 42 Response	The consultation demonstrates a clear understanding of our regional policies, their aims and ambitions but does not make a clear link to how these projects will assist in delivering SPR's stated ambitions for skills, education and employment.	Enhancement measures are included in section 30.3.3 of this chapter.
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	We expect SPR to set and deliver an ambitious plan to maximise the skills, education and employment outcomes for local residents. There are clear opportunities for SPR to capitalise on the skills and employment programmes already being delivered in East Suffolk and across Suffolk, working with us and other local organisations across our skills system to create a legacy that will benefit the area and positively impact people's lives for years to come.	
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	The Memorandum of Understanding between SPR and Suffolk County Council used to deliver Skills and Education interventions for EA3 has been positive and has delivered many positive results. It is not designed to be a tool for local employment targets and these should be discussed and agreed as part of the planning process. If SPR were to not proceed with full build out of either project we expect there to be mechanisms in place to replace the existing skills and education Memorandum of	

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		Understanding with SPR and return any skills and education commitments to tools of planning.	
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	<p>SPR conclude that as the local baseline shows a lower skills level than that of the UK, we would have a local population that could only access lower skills job opportunities.</p> <p>We seek to challenge this assumption; targeted skills intervention would enable more local people to have the opportunity to access higher skills roles. We also have clear evidence that skill levels in Suffolk and the NALEP area are growing faster than comparative regions and we will expect SPR to enhance their current commitments to continue working with local stakeholders to ensure this trend is maintained.</p>	<p>The data used in section 30.5.1.3 of this chapter is from NOMIS the National database. The evidence provided to the Applicant since PEIR by East Suffolk Council shows that that skills levels in Suffolk are growing faster than in 2 of the 3 neighbouring counties, but that they remain below the National average as detailed in section 30.5.1.3 of this chapter.</p> <p>SPR has included skills and training enhancements in section 30.3.3.1 of this chapter to increase the employment opportunities within the area and enable more local people to access higher level jobs.</p>
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	<p>SPR's labour assessment has not taken account of the fact that labour is currently employed, signified by the low unemployment rates in NALEP, and therefore the proposed projects are likely to result in displacement effects in the labour market. SPR has also not included any analysis of current reported skills shortages by employers in the construction, engineering and agricultural sectors, all of which draw on the same pool of workers who possess a similar, connected competence skill set. We urge SPR to assess any current skills shortages to better understand displacement effects and bring forward suitable mitigation.</p>	<p>Details of the potential labour market are included in section 30.6.1.1.1 of this chapter. Current levels of unemployment within the travel to work area are included in section 30.5.2.4 of this chapter, and economic inactivity levels are included in section 30.5.2.1 of this chapter.</p> <p>Construction employment is by its nature temporary, as one project finishes workers move to another. As such, currently employed personnel may become available to work on the proposed East Anglia TWO project throughout the duration of the construction period. In addition, onshore construction employment will have a low magnitude of effect (see Table 30.53) Therefore, labour displacement is not likely to be an issue.</p> <p>SPR has included skills and training enhancements in section 30.3.3.1 of this</p>

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			<p>chapter to increase the employment opportunities within the area and enable more local people to access higher level jobs.</p> <p>Skills shortages were assessed as part of East Anglia ONE and will be further analysed retrospectively.</p>
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	<p>SPR indicates that higher skilled jobs will be mainly resourced from outside the area due to local skills and supply chain constraints. We urge SPR to provide greater investment in skills training (legacy first) and to set specific targets both for SPR and their contractors to deliver a higher proportion of local and regional workers in higher skilled jobs.</p>	<p>Section 30.6.1.1 of this chapter assesses the labour required and concludes that the majority of onshore construction labour will be sourced regionally. As noted above, we have updated the skills baseline with information provided by East Suffolk Council (ESC).</p> <p>Some highly specialist skills will have limited availability which may well be sourced outside the region and may be scarce at a national level.</p> <p>Offshore operations will provide the longer term opportunities for employment and therefore skills enhancement.</p>
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	<p>It should be noted that the employment generated during construction will be short term and only a proportion of this being associated with the cable corridor and substation construction. A larger share of the employment is likely to be based in ports such as Lowestoft or Great Yarmouth for the offshore construction with the longer term opportunities often created in areas a considerable distance from the communities experiencing the permanent effects of the onshore substations and infrastructure, however, as host Authority to Lowestoft Port, we welcome discussions around the opportunities for the Port to be involved in the project longer term.</p>	<p>Noted.</p> <p>Employment impacts are considered in relation to quantity and duration of the jobs created as shown in sections 30.6.1.1, 30.6.1.2 and 30.6.2.1 of this chapter.</p>

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Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	SPR in the consultation for both projects have made no commitment to what port(s) will act as the load out port or where their operations and maintenance (O&M) facilities will be located. We would seek for these to be located within the NALEP geography to ensure we gain maximum economic benefit and further indirect and induced employment opportunities. They will play an important role in the regeneration and development of areas such as Lowestoft. The town is increasingly well placed to take advantage of the significant O&M opportunities and several high profile regeneration projects that are aimed at supporting the growth in the energy sector and we want to work with SPR to ensure Lowestoft Port is a priority area for the location of the O&M facilities.	Noted
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	It is positive to hear that all elements of the onshore construction could be facilitated by UK based companies; however, it is disappointing that SPR through this consultation say it is impossible to define the supply chain at this stage because of the location of suppliers and their competitiveness. Consequently, they do not have a supply chain plan even though one is needed to secure an effective local and regional supply chain that will be needed to leverage the benefits of single or multi offshore wind projects. SPR also make no commitment to use local companies in the construction works planned for each project. We expect to see agreed approaches ensuring local and regional companies are adequately supported to secure as much of this work as possible.	A supply chain plan will be developed post-consent in advance of the CfD process (see section 30.3.3.2 of this chapter)
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	Local, regional and national employment percentages have been included for the purpose of assessment. There is no commitment made by SPR in the consultation to achieve any of these.	

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		The figures used for the purpose of assessment would be positive stretch recruitment targets for the projects and we would like to engage with SPR to set realistic, but, stretching recruitment expectations as part of East Suffolk Council."	
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	SPR creates the argument that we have a growing ageing population and a shrinking working age population and therefore the projects attracting more people of working age to Suffolk is a positive. Although we welcome this positive aspiration the population figures can also be interpreted as a driver of a tight labour market and therefore these projects would further exacerbate an already tight labour market.	Noted.
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	It is good to see that SPR's own calculations suggest that tourism encompasses approximately 20% of employment locally. However, we are concerned about the potentially significant negative impact of the developments on the tourism sector. This is important given that, according to the Suffolk Coastal and Waveney District Councils' Volume and Value Study for all of Suffolk (2017 data), it is estimated that the total value of tourism is £2.03bn, with 42,118 tourism related jobs. We believe that the impacts and mitigation measures need to be identified as soon as possible.	Based upon the assessment in sections 30.6.1.3, 30.6.1.4, 30.6.2.2 and 30.6.4 of this chapter, it is considered that there are no significant adverse impacts upon tourism and recreation receptors either for the proposed East Anglia TWO project alone or cumulatively with the proposed East Anglia ONE North project. Mitigation is therefore only proposed for contributors to potential impact (e.g. air quality, noise and traffic mitigations).
Waveney District Council	26/03/2019 Section 42 Response	In relation to tourism and recreational disturbance, your consultation documents conclude that the impact of the projects will be of negligible significance. The assessment does not however consider the impact on the perception of visitors during the construction phases of the developments especially when considered cumulatively with other energy projects	Perception impacts during construction were omitted from the PEIR and have now been included for project alone and cumulatively (see sections 30.6.1.4 and 30.6.5.1.4 of this chapter).

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		and how this will influence their behaviour and consequently impact on local tourism.	
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	<p>It is disappointing that the Stage 4 documents suggest the proposed construction projects will not negatively impact on the attractiveness of the area to tourists. It is also very concerning that SPR propose no visitor perception survey of their own to assess and measure the tourism related impacts of the proposed developments. The reliance on desk research and trip advisor reviews of wind turbine visual impacts is totally inadequate as this cannot begin to accurately assess tourism related impacts of the disruption caused by the offshore and onshore construction work nor can it realistically assess visitor perceptions of the completed windfarms and onshore substations.</p> <p>SPR refer to a council led independent visitor survey but in fact the only independent survey that we are aware of is the one now being undertaken by the Suffolk Coast Destination Management Organisation (DMO) in partnership with the National Coastal Tourism Academy.</p>	<p>Visual impacts are addressed in Chapter 28 Offshore Seascape, Landscape and Visual Amenity and Chapter 29 Landscape and Visual Impact Assessment.</p> <p>Impacts on perception have been assessed using many sources of which the Trip Advisor study is just one. These are detailed in section 30.5.3.3 of this chapter and Appendix 30.2. The Trip Advisor study benefits from a large sample size (>12,000 comments) consisting of freely offered opinions, rather than tailored questioning and therefore provides useful context alongside the other studies.</p> <p>The PEIR referred to a visitor survey conducted by SCDC mistakenly, the survey referred to is the Suffolk Coast DMO in Partnership with the NCTA. This has been amended in section 30.6.2.2 of this chapter where the misprint was previously.</p>
Waveney District Council	26/03/2019 Section 42 Response	We note there is no reference to a Tourism Fund to mitigate negative impacts on the tourism and visitor economy. We would expect there to be a tourism mitigation fund and also expect to have firm commitment from SPR to support marketing and promotion activities to be undertaken by our partner, the Suffolk Coast DMO and we support Suffolk Coastal District and Suffolk County Councils in this ask of you.	Noted. Enhancement measures are considered outside of the EIA process and therefore not included as part of the assessment presented in this chapter.
Waveney District Council	26/03/2019	In relation to tourism employment, SPR assumes that non-residential workers will stay in local tourist accommodation with the expenditure by non-	The worst case assessed for accommodation impacts in section 30.6.1.3 of this chapter considers a scenario whereby the peak number

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SCC/SCDC	Section 42 Response	residential staff leading to between 11 to 22 FTE jobs on average during the construction period. The assessment also concludes that if peak employment for one project coincides with the high tourist season, the workers would not displace tourists but provide additional income to local businesses. It is not considered that SPR has adequately addressed the issue of peak season accommodation shortages and the cumulative impacts with other energy projects including Sizewell C. We request SPR to ensure it is adequately addressed.	<p>of non-residential workers occurs during peak tourism season. This shows that non-residential workers from the proposed East Anglia TWO project will only take up 47% of the rooms available assuming 80% occupancy from visitors (see Table 30.63 and Table 30.64 of this chapter). Therefore, as assessed, non-resident workers will provide a benefit by using extra capacity, but will not displace tourists.</p> <p>The cumulative assessment suggests that there may be excess demand for rooms when Sizewell C is considered assuming that peak numbers for all project coincide (by approximately 130 workers in total, see section 30.7.2.1.3 of this chapter). However, using revised assumptions from EDF Energy, based upon experience from Hinkley Point C, it is likely that some construction workers engaged in long term work may well look to the rental market rather than hotels etc.</p> <p>The CIA has been updated to include the most up to date consultation material which has been provided by other projects which may have cumulative impacts with the proposed East Anglia TWO Project (section 30.7 of this chapter). It should be noted that EDF Energy propose to submit a Stage 4 consultation document prior to the submission of an ES in early 2020. The proposed publication date of the EDF Energy Stage 4 material mean it is unable to be incorporated into the proposed East Anglia TWO project CIA. Recognising that EDF Energy are proposing further changes to some of their proposals (in particular transport strategies) a detailed CIA based upon Stage 3 materials</p>
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	SPR assume that non-home based workers will stay in local tourist accommodation which will be a benefit when the accommodation sector has out of season capacity. They do not adequately address the issue of peak season accommodation shortages, and their assumptions are also at odds with EDF Energy's Sizewell C analysis which states that most non-home based workers at Sizewell C will stay in the (severely supply limited) private rented sector accommodation as tourism accommodation will be too expensive for them.	
Waveney District Council SCC/SCDC	26/03/2019 Section 42 Response	SPR concluded in the cumulative assessment there would be significant beneficial cumulative impacts to short term, long term and tourism employment. The assessment considered Sizewell C and Vattenfall projects; there is however other significant projects which will create a demand for similarly skilled people (Lowestoft Third Crossing, various housing projects etc). It should also be noted that the assessment in relation to Sizewell C was based on consideration of EDF Energy's Stage 2 consultation material which does not take into account the new maximum employment figures being sensitivity tested by EDF	

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		Energy. The cumulative assessment is currently inadequate and we welcome the opportunity to work with SPR to ensure a more robust assessment is provided. The availability of workers and accommodation will potentially have a knock on impact on the availability of accommodation for tourists.	would potentially be based upon out of date and incorrect information and furthermore, could prejudice EDF Energy's Stage 4 consultation. Note that at the time of the preparation of the PEIR the EDF Energy Stage 2 consultation documents were the most recent publicly available materials.
Waveney District Council	26/03/2019 Section 42 Response	In addition to the above, we support Suffolk Coastal and the County Council and as part of East Suffolk Council, will continue to seek a wider compensation package from yourself and the Government that deals with the broader impacts on community, environment and businesses of these alongside other energy projects in the vicinity.	Noted. Enhancement measures are considered outside of the EIA process and therefore not included as part of the assessment presented in this chapter.
Historic England	26/03/2019 Section 42 Response	Additionally, there may also be instances suitable for beneficial recreational opportunities for new shipwreck site discoveries, given many wrecks are dived by both amateur dive groups and professional organisations. This should also be reflected in tourism and recreation Table row or the separate ES chapter as it has direct relevance to the paragraph 2.6.142 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) (DECC 2011) whereby the assessment should also include the identification of any beneficial effects on the historic marine environment, for example through improved access or the contribution to new knowledge that arises from investigation.	Noted. Recreational diving would be beneficial but given the level of diving in the area the effect would likely be insignificant. The Outline Written Scheme of Investigation (offshore) (document reference 8.6), secured under the requirements of the DCO, includes commitments towards dissemination of information and outreach which will provide a public benefit.
SCC/SCDC	11/03/2019 Section 42 Response	Seek further information regarding Socio-economic assessment assumptions and employment	The predicted direct and indirect employment created by East Anglia TWO, and its induced

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		predictions, labour displacement effects, current skills shortages and mitigation strategies proposed"	<p>employment are included in sections 30.5.2, 30.6.1.1.2 and 30.6.2.1.2 of this chapter.</p> <p>Construction employment is by its nature temporary as one project finishes workers move to another. As such, labour displacement is not considered significant (section 30.6.1.1.1 of this chapter).</p> <p>Skills shortages in the surrounding area were assessed during East Anglia ONE. Skills and labour requirements for the offshore wind industry have been assessed up to 2032 (Energy and Utility Skills, 2018). This is covered in section 30.1 of this chapter.</p>
SCC/SCDC	11/03/2019 Section 42 Response	Seek further information regarding Impact on tourism and recreation during the construction and operation phases and mitigation strategies	Impacts to tourism and recreation throughout the construction phase are included in section 30.6.1.4 of this chapter. Mitigation measures to reduce potential negative impacts are included in section 30.3.3.2 of this chapter.
SCC/SCDC	11/03/2019 Section 42 Response	The NPPF states that 'planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'. The Councils expect this principle to be followed during construction of both EA1N and EA2.	The PRoW Strategy will be agreed with the Local Planning Authority post-consent. The OPRoWS submitted with the DCO application includes the principles for management of PRoWs during construction and proposed alternative routes if required (document reference 8.4).
SCC/SCDC	11/03/2019 Section 42 Response	The access network - public rights of way (PROW), open access and common land are key features of the visitor experience in coastal Suffolk. The quality of the coastal landscape, its high level of accessibility on	Noted. The impacts to PRoWs are considered in section 30.6.1.4.2.1 of this chapter and have

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		foot, by bike or on horse and this connectivity to the coastal towns, villages and hinterland, are the draw for visitors. The consultation does not appear to recognise that although an individual footpath is not a tourist attraction by itself, it is part of the overall tourism attraction to this part of east Suffolk.	been updated in light of refinements to the onshore development area since PEIR. The PRoW Strategy will be agreed with the Local Planning Authority post-consent. The OPRoWS submitted with the DCO application includes the principles for management of PRoWs during construction and proposed alternative routes if required (document reference 8.4).
SCC/SCDC	11/03/2019 Section 42 Response	The consultation documents list the PROWs which are crossed by the cable corridor or used as access to the cable corridor. SPR has however not shown the PROWs on any of the large scale plans with the correct status and path numbers. The duration of the physical works affecting each PROW is also not made clear. For example, the bridleway from Friston to Knodishall, part of the Sandlings Walk, is crossed by the cable corridor, has an associated CCS and will be the haul road into the substation site for 3 years and possibly more. Other PROWs may only require temporary closures of short duration such as a few weeks.	
SCC/SCDC	11/03/2019 Section 42 Response	SPR has stated that management measures or temporary alternative routes will be agreed with Suffolk County Council prior to construction. However, the Councils require management measures, alternative routes and mitigation for the impact on the PROW network to be agreed prior to the submission of the DCOs. Further advisory principles in relation to the PROW network can be found within Appendix A.	
SCC/SCDC	11/03/2019 Section 42 Response	Local partners share the same high-level ambition to develop a sustainable regional and national supply chain with the indirect benefit of increased education and training that these projects will bring to New Anglia. SPR's recognition of the significant opportunities to maximise and support the uptake of local socio-economic benefits through targeted	Noted.

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		enhancement, initiatives and support offered by these projects, learning from what worked from EA1 and EA3 and utilising proven mitigation strategies is welcomed.	
SCC/SCDC	11/03/2019 Section 42 Response	From an Economic Development and Tourism perspective the SPR Phase 4 consultation documents show positive employment impacts both locally and regionally. SPR also reference the potential for positive impacts on the supply chain both regionally and nationally but do not indicate any targets to achieve these benefits (in particular local benefits). We are concerned that the positive benefits and economic potential these developments can bring to our local area are not currently being highlighted (see Employment and Supply Chain note below relating to load out port location and future Operations and Maintenance (O&M) work if these projects go ahead).	Positive benefits to date from East Anglia ONE are highlighted in Chapter 2 Need for the Project, section 2.4 , including the long term investment in Lowestoft
SCC/SCDC	11/03/2019 Section 42 Response	SPR suggests that local tourist accommodation businesses will benefit because non home based workers will use spare capacity in the off-peak tourist season but they do not explain how this impact will be mitigated if non home based workers are using tourist accommodation and preventing visitors from staying in the local area during peak season or where these workers will be accommodated if they are evicted from holiday accommodation in the peak season.	The worst case assessed for accommodation impacts in section 30.6.1.3 of this chapter considers a scenario whereby the peak number of non-residential workers occurs during peak tourism season. This shows that non-residential workers from the proposed East Anglia TWO project will only take up 47% of the rooms available assuming 80% occupancy from visitors (see Table 30.63 and Table 30.64 of this chapter). Therefore, as assessed, non-resident workers will provide a benefit by using extra capacity, but will not displace tourists.
SCC/SCDC	11/03/2019 Section 42 Response	SPR do not fully consider the cumulative impact of a number of projects going ahead in the same timeframe (EA1N, EA2, Sizewell C, and National Grid Interconnectors alongside local infrastructure projects	Cumulative impacts are addressed in section 30.7 of this chapter. The National Grid Interconnectors are not included as there is

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		<p>in the New Anglia Local Enterprise Partnership area (NALEP)).</p> <p>Due to the negative impact that will be felt in terms of employment displacement and tourism we would expect to see SPR seek to mitigate these impacts and where this cannot be done we expect SPR to propose mitigation funds for tourism, housing, communities etc.</p>	<p>insufficient information on these projects to undertake assessment.</p> <p>Construction employment is by its nature temporary, as one project finishes workers move to another. As such, currently employed personnel may become available to work on the proposed East Anglia TWO project throughout the duration of the construction period. In addition, onshore construction employment will have a low magnitude of effect (see Table 30.53) Therefore, labour displacement is not likely to be an issue.</p> <p>Based upon the assessment in sections 30.6.1.3, 30.6.1.4, 30.6.2.2 and 30.6.4 of this chapter, it is considered that there are no significant adverse impacts upon tourism and recreation receptors either for the proposed East Anglia TWO project alone or cumulatively with the proposed East Anglia ONE North project. Mitigation is therefore only proposed for contributors to potential impact (e.g. air quality, noise and traffic mitigations).</p>
SCC/SCDC	11/03/2019 Section 42 Response	<p>The Phase 4 documentation does not consider the impact of additional pressures on the labour market, generated by other major construction projects likely to be on going at the same time. These include the construction of the Sizewell C nuclear power station, Bradwell B, other power stations in England and Wales, National Grid Interconnectors, and sizeable engineering projects such as Crossrail 2. Without considering the impact of multiple projects, any mitigation may be inadequate for the local impacts.</p>	<p>Details of the potential labour market are included in section 30.6.1.1.1 of this chapter. Current levels of unemployment within the travel to work area are included in section 30.5.2.4 of this chapter, and economic inactivity levels are included in section 30.5.2.1 of this chapter.</p> <p>The CIA has been updated as far as possible with information from EDF Energy noting their proposal to submit a Stage 4 consultation document prior to the submission of an ES in early 2020.</p>

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SCC/SCDC	11/03/2019 Section 42 Response	SPR has made no assessment of the impact Brexit will have on the ability of the projects to employ people, this will likely exacerbate the local and regional labour market and therefore we expect SPR to address this adequately.	The impact of Brexit is outwith the scope of this assessment.
SCC/SCDC	11/03/2019 Section 42 Response	No information is given on likely wages to enable any forecasting/calculation of likely Gross Value Added (GVA) benefit to the local economy.	<p>Section 30.4.1.4.2 of this chapter discusses the ONS advice on GVA which states that “<i>The complex calculations and imputations used to produce GDP and regional GVA estimates cannot be applied at the firm level</i>”</p> <p>The assessment is based, as was agreed with stakeholders through the Method Statement, on estimated number of staff compared to available labour market.</p> <p>Specific details on average salaries for construction workers are included in section 30.6.1.1.3 of this chapter.</p> <p>Details on average salaries for roles in the offshore wind sector are included in section 30.6.1.2.3 of this chapter.</p>
SCC/SCDC	11/03/2019 Section 42 Response	Without additional mitigation, evidence suggests that local economic benefits will be lower than anticipated whilst negative effects such as displacement are likely to be greater. It is therefore essential for the Councils to seek from SPR early agreement of a robust and properly resourced mitigation plan to increase local economic benefits and reduce negative effects.	<p>Embedded mitigation measures are included in section 30.3.3.2 of this chapter. Additional measures have been included in the form of enhancements in section 30.3.3.1 of this chapter.</p> <p>Construction employment is by its nature temporary, as one project finishes workers move to another. As such, currently employed personnel may become available to work on the proposed East Anglia TWO project throughout the duration of the construction period. In addition, onshore construction employment will</p>

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			have a low magnitude of effect (see Table 30.53) Therefore, labour displacement is not likely to be an issue.
SCC/SCDC	11/03/2019 Section 42 Response	We expect SPR to develop clearly defined partnership strategies focussed on potential areas of economic benefit, such as, inward investment and supply chain development alongside developing innovative schemes to encourage non home based workers to spend money with local retailers.	A supply chain plan will be developed post-consent in advance of the CfD process (see section 30.3.3.2 of this chapter).
SCC/SCDC	11/03/2019 Section 42 Response	SPR implies as part of their estimated home based/non home based workforce split that there are sufficient workers with the requisite skills based either locally or regionally. It does not reference the fact that these identified workers are probably currently employed meaning that there will be significant displacement of these workers from existing jobs, businesses and the supply chain that will clearly impact negatively on the local economy. For example, SPR quote that 16,545 appropriately skilled workers exist locally but they do not say that they are all currently employed elsewhere.	<p>The predicted direct and indirect employment created by East Anglia TWO, and its induced employment are included in sections 30.5.2, 30.6.1.1.2 and 30.6.2.1.2 of this chapter.</p> <p>Construction employment is by its nature temporary, as one project finishes workers move to another. As such, currently employed personnel may become available to work on the proposed East Anglia TWO project throughout the duration of the construction period. In addition, onshore construction employment will have a low magnitude of effect (see Table 30.53) Therefore, labour displacement is not likely to be an issue.</p> <p>Skills shortages in the surrounding area were assessed during East Anglia ONE. Skills and labour requirements for the offshore wind industry have been assessed up to 2032 (Energy and Utility Skills, 2018). This is covered in section 30.1 of this chapter.</p> <p>The mitigation and enhancement measures to minimise adverse impacts and increase the skills</p>

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			levels and employment opportunities for locals are included in section 30.3.3 of this chapter.
SCC/SCDC	11/03/2019 Section 42 Response	To maximise the benefits of the projects in the local area, there needs to be a strong and pro-active partnership between SPR, the Councils and other stakeholder bodies including NALEP and the Suffolk Chamber of Commerce. SPR is equally expected to work with these stakeholders to minimise negative economic impacts on local communities and the local and regional economy. This includes defining mitigation measures to be included in the final DCOs.	Based upon the assessment in sections 30.6.1.3, 30.6.1.4, 30.6.2.2 and 30.6.4 of this chapter, it is considered that there are no significant adverse impacts upon tourism and recreation receptors either for the proposed East Anglia TWO project alone or cumulatively with the proposed East Anglia ONE North project. Mitigation is therefore only proposed for contributors to potential impact (e.g. air quality, noise and traffic mitigations).
SCC/SCDC	11/03/2019 Section 42 Response	The Councils expect to see a clear, realistic, positive mitigation strategy with key targets and ranges for financial investment that SPR is proposing for each economic area affected, including skills, tourism, supply chain etc. The Councils need to have greater understanding of and further discussion on the intent and scale of investment from SPR.	A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the skills environment required for the proposed East Anglia TWO project. A supply chain plan will be developed post-consent in advance of the CfD process (see section 30.3.3.2 of this chapter)
SCC/SCDC	11/03/2019 Section 42 Response	The Councils expect SPR to provide a supply chain plan with agreed approaches to ensure local and regional companies are adequately supported to secure the future work on the projects.	A supply chain plan will be developed post-consent in advance of the CfD process (see section 30.3.3.2 of this chapter). To participate in the CfD scheme applicants must demonstrate that they have an approved Supply Chain Plan for the project they intend to build. The aim of the Supply Chain Plan is described in published guidance from the Department of

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			<p>Business, Energy and Industrial Strategy (BEIS)¹.</p> <p>The UK Government will assess the extent to which plans:</p> <ul style="list-style-type: none"> • Support the development of competition in supply chains; • Support innovation in supply chains; and • Support the development of skills in supply chains <p>If a project is successful in the CfD scheme then the Supply Chain Plan will be monitored by BEIS. This will include gathering evidence relating to the delivery of commitments and/or actions identified in the Supply Chain Plan.</p>
SCC/SCDC	11/03/2019 Section 42 Response	SPR should set realistic but stretching employment targets. There is no commitment by SPR to the employment figures provided within the PEIRs.	Supply chain targets are not being created at this time. A supply chain plan will be developed post-consent (see section 30.3.3.2 of this chapter).
SCC/SCDC	11/03/2019 Section 42 Response	In relation to tourism and recreational disturbance, the SPR consultation documents conclude that the impact of the projects will be of negligible significance. The assessment does not however consider the impact on the perception of visitors during the construction phases of the developments especially when considered cumulatively with other energy projects and how this will influence their behaviour and consequently impact on local tourism.	Perception impact during construction were omitted from the PEIR and have now been included for project alone and cumulatively (see sections 30.6.1.4 and 30.6.5.1.4 of this chapter)

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/759231/AR3_SCP_Guidance_-_Nov_2018.pdf

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SCC/SCDC	11/03/2019 Section 42 Response	The Councils note there is no reference to a Tourism Fund to mitigate negative impacts on the tourism and visitor economy. We would expect there to be a tourism mitigation fund and also expect to have firm commitment from SPR to support marketing and promotion activities to be undertaken by our partner, the Suffolk Coast DMO.	Noted. Enhancement measures are considered outside of the EIA process and therefore not included as part of the assessment presented in this chapter.
SCC/SCDC	11/03/2019 Section 42 Response	The SLVIAs identified significant effects from the offshore infrastructure of EA2 and EA1N and EA2 cumulatively on the AONB. The AONB and Heritage Coast are designations which are largely based on the tranquillity and unspoilt nature of the area. It is this natural asset which tourists come to visit. The Councils are concerned regarding the harm caused to the purpose of the designations and the consequential impact on the tourist industry. This harm cannot easily be mitigated and therefore SPR should be providing compensation.	Both visual impacts to the seascape from the shore and the associated mitigation measures, are addressed in full in Chapter 28 Offshore Seascape, Landscape and Visual Amenity . Since PEIR, further refinement to the East Anglia TWO windfarm site boundary has been undertaken. The north-south extent of the East Anglia TWO windfarm site has therefore been reduced (see Chapter 4 Site Selection and Assessment of Alternatives, section 4.6 and Figure 4.3) in order to mitigate potential seascape impacts, without a reduction in wind turbine numbers or generation capacity.
SCC/SCDC	11/03/2019 Section 42 Response	SPR indicates that higher skilled jobs will be mainly resourced from outside the area due to local skills and supply chain constraints. The Councils urge SPR to provide greater investment in skills training (legacy first) and to set specific targets both for SPR and their contractors to deliver a higher proportion of local and regional workers in higher skilled jobs.	Section 30.6.1.1 of this chapter assesses the labour required and concludes that the majority of onshore construction labour will be sourced regionally. As noted above, we have updated the skills baseline with information provided by ESC. Some highly specialist skills will have limited availability which may well be sourced outside the region and may be scarce at a national level. Offshore operations will provide the longer term opportunities for employment and therefore skills enhancement.

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Norfolk County Council	03/2019 Section 42 Response	<p>While Norfolk County Council welcomes the potential employment opportunities these offshore proposals will have within the local/regional area both during construction and once operational, there are significant economic issues, which these proposals will need to address with regard to:</p> <ul style="list-style-type: none"> a) The cumulative impacts on the local labour market; and supply chain (i.e. taking into account other planned NSIPs e.g. Sizewell C; Norfolk Vanguard Offshore Wind Farm; Hornsea Project Three; and Boreas Offshore Windfarm). b) Developing a local skills strategy to ensure there are sufficient skilled workers. Norfolk County Council would especially welcome measures that will enable permanent, long term job opportunities to be taken up by local people; and c) In addition, the County Council would support measures that would encourage/enable people currently excluded from the formal labour market to be supported into jobs at any level/degree of permanency. 	<p>Noted.</p> <p>Employment opportunities are included in sections 30.6.1, 30.6.1.2, 30.6.1.3 and 30.6.2.1 of this chapter.</p> <p>Cumulative impacts are assessed in section 30.7 of this chapter.</p> <p>A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the skills environment required for the proposed East Anglia TWO project.</p>
Norfolk County Council	03/2019 Section 42 Response	<p>It is felt that given the proposal's proximity to Norfolk and the likelihood of additional major construction projects in both Norfolk and Suffolk arising from the offshore wind energy sector and Nuclear sector (as outlined above) there is a need for an Education, Skills and Employment Strategy to be prepared to address / consider the wider cumulative impacts arising from other planned NSIPs in the area (i.e. covering the above offshore projects and Sizewell C). It is suggested that contact be made with the Norfolk County Council's Economic Development Manager</p>	<p>A skills strategy was developed by SPR for East Anglia ONE in conjunction with the relevant Local Planning Authorities. This is being developed further for East Anglia THREE. The implementation of this strategy has created the skills environment required for the proposed East Anglia TWO project.</p>
Suffolk Coast DMO	23/03/2019	The value of tourism within East Suffolk is approximately £600M. In the nearby Suffolk Coasts	Noted.

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	Section 42 Response	and Heaths Area of Outstanding Natural Beauty tourism is worth £210M per annum, supporting 4,655 jobs (2017 Volumes and Values study). TSC agrees with SPR's statement that tourism "is an important part of the wider economy".	
Suffolk Coast DMO	23/03/2019 Section 42 Response	Damage to Visitor Economy has not been assessed SPR has not given adequate consideration to the harm that would be caused to the visitor economy in the local area by the construction of the onshore infrastructure and cabling, including the landfall at Thorpeness Cliffs (a treasured local tourism asset).	HDD mitigates potential impacts to the Thorpeness cliffs as detailed in Chapter 6 Project Description . Potential impacts on tourism are detailed in sections 30.6.1.3, 30.6.1.4 and 30.6.2.2 of this chapter, with mitigation measures in section 30.3.3.2 of this chapter.
Suffolk Coast DMO	23/03/2019 Section 42 Response	I have attended two Expert Topic Group (ETG) meetings (12th June 2018 and 24th January 2019), organised by SPR and their consultants Royal Haskoning DHV. At both meetings I stated my concern that the impact on tourism was not being given proper consideration. Chapter 30 generally focusses on two issues; a) whether tourists mind looking at wind turbines and b) whether tourism businesses can benefit from workers renting accommodation.	The assessment considers Tourism and Hospitality Sector Employment (section 30.6.1.3 of this chapter) and Tourism and Recreation Disturbance (section 30.6.1.4 and section 30.6.2.2 of this chapter), these are also considered cumulatively (section 30.7 of this chapter). The assessment therefore covers direct and indirect impacts upon tourism assets (including traffic impacts), impacts upon accommodation supply and potential impacts from perceived changes to the character of the area (both offshore and onshore).
Suffolk Coast DMO	23/03/2019 Section 42 Response	The chapter acknowledges the National Policy Statements (NPS) for Energy (Dec 2011) that Nationally Significant Infrastructure Projects (NSIPs) should assess their effects on tourism. However, the chapter fixates on tourism assets within 1km of the development area and does not consider the damage that the projects could have on the perception to the	Section 30.3.1.2 of this chapter defines the study area for recreation and tourism which includes different areas of effect for direct impacts and indirect impacts. Whilst the direct impacts are indeed focused within or in proximity to the onshore development area (e.g. air quality and noise impacts) the Seascape assessment considers an area encompassed by the SLVIA

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		area, and tourism assets that are close-by (Aldeburgh and Snape).	<p>study area which is defined as a 50km radius from the outermost wind turbines of the East Anglia TWO windfarm site (see Chapter 28 Offshore Seascape, Landscape and Visual Amenity)</p> <p>Various studies have been used to assess the tourism impact of perceptions of development (section 30.5.3.3 of this chapter and Appendix 30.2)</p>
Suffolk Coast DMO	23/03/2019 Section 42 Response	The chapter repeatedly refers to the difficulty of measuring tourism impact, and yet has not considered an obvious method – to survey existing and prospective visitors. TSC has worked with the National Coastal Tourism Academy (an organisation referred to in Chapter 30) to commission a survey to measure the effect the two SPR projects and Sizewell C could have on tourism demand and therefore the visitor economy.	Various studies have been used to assess the tourism impact of developing an offshore windfarm detailed in section 30.5.3.3 of this chapter and Appendix 30.2
Suffolk Coast DMO	23/03/2019 Section 42 Response	Chapter 30 refers to the emerging Suffolk Coastal District Council Local Plan, quoting its ambition to “to manage tourism across the district in a way that protects the features that make it attractive to visitors” and yet there is no real reference to the damage that could be caused to the perception of the area by NSIPs.	Potential impacts on tourism are included in sections 30.6.1.3, 30.6.1.4 and 30.6.2.2 of this chapter. Studies which assess the impact to tourism are detailed in section 30.5.3.3 of this chapter and Appendix 30.2
Suffolk Coast DMO	23/03/2019 Section 42 Response	Chapter 30 repeatedly refers to the 2015 AONB tourism Volumes and Values report. It should be noted that a 2017 version has been produced	The 2017 updates are now included in sections 30.5.2.7 and 30.5.2.8 of this chapter.
Suffolk Coast DMO	23/03/2019 Section 42 Response	Whilst a slightly arbitrary Trip Advisor “meta study” suggests that only a very small number of tourists refer to wind turbines in their holiday reviews there is only a passing reference to the impact of onshore construction, with a 2014 National Grid study “proving”	Several studies have been reviewed which attempt to measure the impact of perception on tourism. These are included in section 30.5.3.3 of this chapter and Appendix 30.2 . An additional Trip Advisor study was conducted using the largest sample size of any perception study

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		that this will have very little impact. This assessment is too generic and not acceptable.	included in the ES which is also detailed in section 30.5.3.3 of this chapter.
Suffolk Coast DMO	23/03/2019 Section 42 Response	Insufficient cumulative impact assessment SPR has not satisfactorily attempted to acknowledge or consider the cumulative impacts of the EA2 and EA1N projects with the other planned energy projects. References to EDF Energy's new nuclear power station Sizewell C are included, but it is clear that despite being "in communication to understand each other's programme" the information is outdated and largely dating from 2016.	Noted. The best available information was used at the time of writing. The CIA has been updated as far as possible with information from EDF Energy noting their proposal to submit a Stage 4 consultation document prior to the submission of an ES in early 2020.
Suffolk Coast DMO	23/03/2019 Section 42 Response	Insufficient cumulative impact assessment There is no masterplan and seemingly no joined-up thinking or impact assessment. This is unacceptable when tourism is such a significant part of the local economy. The NSIPs are too large for this small, rural area."	Chapter 2 Need for the Project details the urgency and the masterplan behind the East Anglia TWO Project. Chapter 3 Policy and Legislation includes the relevant legislation in regards to environmental impact assessments for NSIPs, including cumulative assessment (sections 3.5.2, 3.6.2 and 3.6.3 of this chapter).
Suffolk Coast DMO	23/03/2019 Section 42 Response	TSC is deeply concerned by the proposed developments, and in conjunction with the National Coastal Tourism Academy, has commissioned an independent study by leading consultants BVA-BDRC. The study will measure the impact that the prospective EA2 and EA1N projects and the nearby Sizewell C project would have on the visitor economy and will be published in the spring of 2019.	Noted. The Applicant has contacted Suffolk Coastal DMO and the NCTA. The resultant discussion in July 2019 confirmed that whilst the surveying portion of this study is complete, that the data requires further processing and is not ready at the time of writing.
Suffolk Coast DMO	23/03/2019 Section 42 Response	The emerging data, gathered from over 1700 online respondents, suggests that there could be a significant reduction to the AONB's visitor economy, currently worth £210M annually	Noted. The Applicant contacted Suffolk Coastal DMO and the NCTA to access their independent study of potential impacts to the local tourism industry. The resultant discussion in July 2019 confirmed that whilst the surveying portion of this study is complete, that the data requires further processing and is not ready at the time of writing.