

SPR EA1N and EA2 PROJECTS



DEADLINE 2 - COMMENTS ON EXQ1 RESPONSES – 1.17 SOCIO ECONOMIC ISSUES

Interested Party: SASES

IP Reference Nos. 20024106 and 20024110

Issue: 1

Reference	Question	Response	SASES Comment
1.17.1	<p>Cumulative Effects</p> <p>ES Chapter 30 [APP-078] identify, in Tables 30.84, which build out scenario for EA1N and EA2 provides the worst-case in relation to onshore construction employment, offshore construction employment, tourism employment and tourism and recreation employment. They conclude, in relation to tourism and socio-economic effects, moderate and major beneficial significance. The Offshore Cumulative Impact Assessment (CIA) [APP-477] includes a number of offshore windfarms that are screened into the assessment as set out in Table 2.1 of Appendix 14.4. An arbitrary 10nm distance to screen projects into</p>	<i>Not reproduced</i>	The defects in the Applicant’s approach to cumulative impacts is well documented elsewhere.

	<p>the assessment has been used, but this is not explained.</p> <p>Explain your criteria in relation to screening in projects into the assessment and any confirmation of approach through consultation you received.</p>		
1.17.2	<p>Cumulative Effects</p> <p>Local hotel accommodation is likely to be in demand during the peak summer season and at varying degrees around the year focused on school holidays. SCC raise concerns over cumulative pressures on workforce, supply chain and accommodation for workers, including Sizewell C [RR- 007]. The ExA note the Applicant's statement [AS-036] that workers for Sizewell C will choose to stay within the rental market.</p> <p>a) Do you consider enough accommodation would be available locally for any necessary construction workers who may be from outside of the area to stay in, particularly in peak times, and considering both projects and other local schemes such as Sizewell C? Can the Applicant</p>	<p>The Applicants have submitted a Socio-Economics and Tourism Clarification Note (SZC CIA) (ExA.AS-17.D1.V1) at Deadline 1 which deals with the matters raised.</p> <p>In summary, the Applicants have considered the following documents from SZC:</p> <ul style="list-style-type: none"> •Volume 2 Main Development Site Chapter 9 Socio-economics (SZC APP- 195) •Volume 2 Main Development Site Chapter 9 Socio-economics Appendices 9A - 9F (SZC APP-196) •Volume 10 Project-wide, Cumulative and Transboundary Effects, Chapter 4 Assessment of Cumulative Effects with Other Plans, Projects and Programmes (SZC APP-578) <p>Although there are changes to the worker numbers presented for SZC in the SZC</p>	<p>The Applicant states "There would be excess demand only in peak season"</p> <p>This response indicates the Applicant's lack of understanding of the tourism economy. "Peak season" is the most important time for the tourist economy, it is when it makes the majority of its profit. There is no comparison between the spending levels and patterns of people coming to work compared to those who are visiting the area on holiday.</p> <p>The Applicant's response inadvertently demonstrates the risk to the tourism economy.</p> <p>Holiday accommodation in this area is "holiday accommodation". There is no consideration of the effects of holiday accommodation being shared by visitors and their families and construction employees or how this impacts on communities.</p> <p>Regard should also be had to the report of a recent letter to PINS from the Suffolk Safeguarding Partnership (SSP) in respect of Sizewell C – whose key members are the Police, Suffolk County Council and the County's Health Services. It expresses serious concerns about</p>

	<p>secure any mitigation to promote the use of rental rather than holiday accommodation?</p> <p>b) Provide further evidence on cumulative pressures on the local workforce and supply chain were the schemes and Sizewell C to be consented, such as potential overall numbers of construction required, including potential numbers which may be from out of the local area and thereby require accommodation.</p> <p>In carrying out the CIA what information have the Applicants been provided by Sizewell in relation to accommodation use by their workforce?</p>	<p>application documentation compared to those used by the Applicants in their Applications, the Applicants do not consider that these would materially change the conclusions presented in the Applications. There would be excess demand only in peak season and only in the scenario where the Projects are constructed in parallel and this coincides with the SZC civils peak. This scenario is unlikely given the published construction programmes for the three projects. The Applicants have concluded this both from a review of the SZC CIA conclusions and by taking the SZC project-alone numbers and re- running the cumulative assessment presented in the Applications.</p> <p>The Applicants continue to discuss tourism matters with SCC/ESC.</p>	<p>the impact of construction workers on the local area, particularly concerns relating to prostitution and drugs.</p> <p>The partnership is also concerned about the quality of life for older people – especially as the huge project will turn a quiet and peaceful area into a noisy, busy and “probably chaotic” environment – and the impact on people with learning disabilities.</p> <p>https://www.eadt.co.uk/news/sizewell-c-pop-up-brothels-and-county-lines-1-6920469</p>
1.17.5	<p>Memorandum of Understanding (MoU)</p> <p>A MoU is discussed to ensure a commitment for local authorities and the Applicant to maximise education, skills and economic</p>	<p>a) The MoU is an agreement which has been signed by Suffolk County Council, East Suffolk Council and Scottish Power Renewables (UK) Limited (SPR). During the construction of East Anglia ONE, SPR and SCC collaborated under an MoU to maximise education, skills and economic benefits. The MoU successfully captured</p>	<p>There is no information as to the verifiable benefits being directly delivered by the existing projects EA1N or EA3.</p> <p>With reference to the £30 million being invested in Lowestoft port this should be spread over at least four and if not more projects. SASES’s understanding is that the overall investment in EA1 alone was £2.5 billion. In that context a fractional share of £30 million is insignificant.</p>

	<p>benefits of the projects. Such a MoU is welcomed by SCC.</p> <p>a) How would such an MoU be enacted, and would it be binding?</p> <p>b) Have means of securing it directly (through for example discharge of a requirement or conclusion of a Planning Obligation under the Town and Country Planning Act 1990) been considered and would they be necessary?</p> <p>Please update the ExA on the progress of the MoU. Have the New Anglia Local Enterprise Partnership been involved?</p>	<p>the importance of collaboration between both parties. The MoU has now been updated in respect of the Projects and East Anglia Three and it establishes the commitment for all parties to continue to develop the close working relationship with the intention to work in partnership to maximise the benefits of the SPR East Anglia Offshore Wind Projects. This ensures a collaborative and cohesive approach towards the delivery of the associated skills activity within the communities most closely associated with our projects.</p> <p>A strong working relationship has been established since works commenced on East Anglia ONE and the Applicants will build on this relationship through the delivery of the Projects and East Anglia THREE.</p> <p>Securing the commitments made within the MoU through the formal planning process was considered, however based on the outputs to date this was deemed not necessary. The MoU promotes collaborative working between parties, ensuring that outreach, activity and action all remain relevant in addressing the local needs as they evolve.</p> <p>The flexible nature of the MoU, particularly during COVID, has allowed the Applicants to create new methods of engagement and provide support in order</p>	<p>In terms of skills and education the MOU is vague. There are no binding targets, deliverables or quantified investment of resources (people and money).</p> <p>The question needs to be asked (and answered) as to what meaningful results (with long term benefits) have been achieved locally in skills and education from the EA1 and EA3 projects.</p> <p>Paragraph 5.12.7 of EN-1 states that “the IPC may conclude that limited weight is to be given to assertions of social economic impacts that are not supported by evidence”</p>
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1.17.6	<p>Tourism</p> <p>ES Chapter 30 [APP-078] makes reference to a survey of Trip Advisor reviews , which identified that independent reviews of coastal tourism assets with a view of offshore windfarms shows that of 12,710 reviews (as of 28th of May 2019) only 92 reviewers mention windfarms or wind</p>	<i>Not reproduced</i>	<p>The Applicant makes reference to:</p> <p>a) The National Coastal Tourism Academy (NCTA) research into why visitors choose to visit coastal areas</p> <p>b) the research by Biggar Economics considering changes in visitor behaviour or spending in other areas where there has been offshore wind farm development.</p> <p>None of this research specifically relates to the area of the Suffolk where these projects are going to be</p>

	<p>turbines (or derivatives of these terms) at all, with positive and negative opinions then relatively evenly split. The ES states that this indicates that the majority of visitors (99.72%) to the coast of England either do not hold strong enough opinions about the location of offshore wind development to comment, do not feel negatively towards, or did not notice or see the infrastructure.</p> <p>a) Is this survey any more substantially based than a straight search of TripAdvisor reviews? Has this method of determining impact of offshore wind turbines on tourism been endorsed by other bodies or research?</p> <p>b) Is there any more directly relevant research available, either nationally or at a more local level in which specific questions regarding tourists perceptions/views of wind farms have been asked (as opposed to just whether they are mentioned specifically in general TripAdvisor reviews)?</p> <p>c) Could there be a difference between tourist perceptions of wind farms cumulatively i.e. could more wind farms visible along a coast lead to more negative views</p>		<p>constructed including the other projects which will be built here following the construction of the new National Grid connection hub.</p> <p>The only area specific research that has been conducted is by the DMO which the Applicant is unwilling to meaningfully engage with. That research paints quite a different picture.</p> <p>In circumstances where there are conflicting reports it would seem that the report which specifically deals with the area affected by the projects should be preferred.</p> <p>No research has been conducted as to the impact on the local economy from the potential loss of “inward investment” from people choosing to move to this area for leisure/retirement which makes a significant contribution to the economy.</p> <p>As for TripAdvisor data its accuracy can in no way be guaranteed.</p>
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	of wind farms than a single visible wind farm?		
1.17.7	<p>Tourism</p> <p>SCC state that [RR-007] the potential impact on tourism is not adequately addressed within the application document set, especially when taking into consideration the visitor survey undertaken by the Destination Management Organisation (2019).</p> <p>The ExAs cannot find reference to the survey noted by the County Council in your response [AS-036]</p> <p>Respond to the point of SCC, or point the ExA to your response to this.</p>	<p>Mention of the DMO report was omitted from the response. The response should have included text to reflect that the DMO report was published in late September 2019 (although the report itself is dated April 2019, see press release dated 25th September 2019⁵), after the EIAs for the Projects had been approved and were in the process of final review. Therefore, it was not practicable to include the DMO Report findings in the EIA.</p> <p>The Applicants would have included the findings of the DMO Report within the EIA if available within the timescales of the assessment. It is the Applicants' view that this would have provided extra context on receptor sensitivity (taken as a generalised Suffolk coast visitor) but not ultimately changed the conclusions of the impacts of the Projects.</p> <p>The Applicants note that although the DMO Report tried to disentangle Projects from the Sizewell C development (SZC), the headline results on impact are based on the cumulative position and not the Projects alone. There is no attempt to assess the impact of the Applicant's projects without SZC. The DMO Report cannot be used to support any</p>	<p>The Applicant states "he DMO Report cannot be used to support <u>any</u> conclusions with regard to the Applicant's projects alone." (<i>emphasis added</i>)</p> <p>The DMO Report is the only expert survey which has looked at the specific area where the projects are going to be constructed. If one is trying to reach an accurate assessment of the true impact upon the local tourism economy it would seem illogical to dismiss it out of hand. At the very least it would suggest that more meaningful research should be conducted by an independent expert. This has been called for by two prominent businesses based locally , Adnams plc and Snape Maltings/Britten Pears Arts in their representations.</p> <p>The Applicant makes great play of the fact the report was dated April 2019 but not released publicly until September 2019. Accordingly the Applicant has had over a year to meaningfully engage with this report and has failed to do so.</p>

		conclusions with regard to the Applicant's projects alone.	
17.7.8	<p>Tourism</p> <p>ES Chapter 30 [APP-078] considers possible or potential effects on Tourism in the area of the proposals via two possible pathways:</p> <ul style="list-style-type: none"> - direct effects during construction of the proposed developments through disturbance; and - the perception of large-scale developments as being an adverse impact on the area as a tourist destination. <p>This latter pathway is described as depending on two factors:</p> <ul style="list-style-type: none"> - that a development would have to be in the public eye and known to potential visitors; or - visitors already in the area would need come into contact with 	<p>a) Whilst the pathway suggested is plausible this was not raised as a concern in the DMO Report.</p> <p>The main concerns raised in the DMO Report were disruption to the natural beauty of the area, and traffic and congestion; notably most participants travelling to the Suffolk Coast by car (79-97%). The main concerns voiced by visitors and businesses were similar - loss of tranquillity, traffic congestion, loss of AONB, damage to habitats and road obstructions. All of these concerns are impacts assessed within the Project EIA. These concerns match those raised by the DMO to the Applicants in pre-application consultation.</p> <p>There were no reported concerns regarding operation effects (onshore or offshore) in the DMO Report. This supports the assumptions within the EIA on long term tourism effects.</p> <p>In addition, the studies of other areas (adjacent to the North Norfolk Coast AONB) in the Tourism Impact Review (Appendix 13 of this Document) include a long period after the construction of wind</p>	<p>As the Applicant states this pathway is indeed plausible and is something which further reinforces the need for an independent expert report into the impact of the project (including true cumulative impact) on tourism and "inward investment".</p>

	<p>construction activity or traffic effects and link that to the Project.</p> <p>Is there a potential third pathway consisting of an effect on future tourist numbers due to contact with the constructed proposals? For instance, while the development may not necessarily impinge on the consciousness of a potential tourist, once they have been to the area once and seen the project(s), their experience may reduce their likelihood of making a return visit and cause them to holiday elsewhere in future.</p> <p>a) Is this a potentially relevant significant effect and, if so</p> <p>b) Does the Applicant consider that such an assessment is necessary? If not, please justify</p>	<p>farms in the Wash (adjacent to the North Norfolk Coast AONB) with no effect on changes in visitor, or potential visitor, spending.</p>	
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