

ISSUE SPECIFIC HEARING: ONSHORE – 20th JANUARY 2023

Norfolk Parishes Movement for an OTN

Tourism

We would like to raise with you our concern regarding the cumulative impacts of this DCO application on tourism in Norfolk. This is a concern to numerous businesses in our parishes and Norfolk is renowned for its attractiveness as a holiday destination. Tourism employs over 50,000 FTE and injected £2.42 bn into the local economy in 2019 so it is clearly an important industry for our region.

Document App-113 refers to the Cumulative Impact of Onshore Construction on Volume and Value of Tourism Activity and concludes:

“On this basis the overall magnitude of effect of onshore construction on the volume and value of tourism as a result of all projects considered is assessed as negligible to low.”

We are not expert in this area but this appears ultimately to be a subjective determination by the applicant based on assessment of “receptors” such as visual impact, noise, etc. The consideration of cumulative effects seems largely confined to locations where cable paths cross. Is this really a reliable way of assessing the impacts of these project on tourism? The Applicant references similar studies performed by other DCO applicants in the past to justify their approach and we are concerned that simply relying on precedents in this area may not be valid. Furthermore, it seems extraordinarily convenient that the conclusions are always “no negligible impact” or “minor adverse impact”. We are tempted to conclude “they would say that wouldn’t they”.

With regard to the impact on tourists themselves, we believe this is a far more important gauge of whether tourists will continue to come on holiday to the area. The Applicant has covered this issue in Document App-277.

The Applicant relies on desk-bound research from a limited body of evidence relating to the extent to which offshore wind farms impact upon tourists. Nevertheless, the Applicant is able to conclude (page 56) that:

“Overall, the evidence suggests that offshore wind farm developments generate very limited, or no negative impact on tourist and recreational users during the construction and O&M phases.”

We take issue with that conclusion – it is made on the basis of a handful of papers which have questionable relevance to the current application. The majority of the references are ex-ante and refer to locations very different to Norfolk. The studies were conducted in the USA, Spain, Ireland and Scotland. We query the relevance of these locations to the expectations of persons holidaying in Norfolk and we submit that in fact they may be quite different. Most of the studies consist of surveys of opinion asking about people’s attitudes to windfarms and the extent to which their holidays have been affected by existing offshore windfarms. They do not include questions which set out the context of our concerns and

none of the studies appear to address the impact during the construction phase when tourists are likely to experience negative impacts (of traffic delays, noise, dust, etc.) or consider the cumulative impact of several large NSIPs overlapping and occurring over a sustained period of many years. We are not aware of any follow-up studies, and none are proposed, which specifically examine the construction phase impacts and how these affect tourism longer term. In the case of this application, we believe the cumulative impacts of construction, lasting well over a decade, make this a vital consideration.

We wonder whether the Applicant might be asked to provide relevant, objective information that we can all have confidence in and to properly justify or amend their conclusions.

Finally, we make the observation that the shorter the onshore footprint, the shorter will be the construction phase and the less impact there will be on tourism. If Walpole was selected for the grid connection point for these projects, the onshore cable path footprint would be substantially shorter than that proposed in the current DCO.