



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

## The Applicant's Response to North Norfolk District Council's Deadline 3 Submission

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## **1 The Applicant's Response to North Norfolk District Council Deadline 3 Submission**

1. This document presents the Applicant's response to Section 2 Tourism, Recreation and Socio-Economics of the North Norfolk District Council's Deadline 3 submissions [REP3-125]. The Applicant's comments on the North Norfolk District Council's responses to second written questions are provided in **The Applicant's Comments on Responses to the Examining Authority's Second Written Questions** [document reference 18.2].

**Table 1-1 The Applicant's Response to North Norfolk District Council Deadline 3 Submission**

ID	Stakeholder Comment	Applicant Response
<b>Tourism, Recreation and Socio-Economics</b>		
1	<p>During Issue Specific Hearing 4 (Agenda Item 6) NNDC set out concerns that the localised impacts associated with the on-shore construction phase of the SEP &amp; DEP project had likely been underestimated by the Applicant. NNDC explained that there was little in the way of conclusive evidence from existing NSIP projects linked to impacts on tourism businesses.</p>	<p>The Applicant has presented a range of evidence showing that offshore wind farms do not have a negative impact on tourism:</p> <ul style="list-style-type: none"> <li>• The literature review presented in ES <b>Chapter 27 – Socio-Economics and Tourism</b> [APP-113] presents the findings of a substantial number of studies which have explored this relationship. These include studies undertaken on behalf of national governments and government agencies, and meta-analyses by independent academics. These consistently find that there is no evidence of either positive or negative impacts on tourism.</li> <li>• A 2020 study by Biggar Economics analysed trends in employment in tourism related sectors in local authority areas during the period when offshore wind farms (all NSIP projects) have been constructed. In the majority of cases tourism employment in the local district grew at a faster rate during the construction period than the long-term average. In North Norfolk itself it found that tourism related employment grew at a faster rate than the regional and national average while onshore construction of Dudgeon offshore wind farm was taking place.</li> <li>• Data from the Economic Impact of Tourism reports undertaken by Destination Research on behalf of North Norfolk Council shows that the number of visitors to North Norfolk has grown at a high rate over the period when Dudgeon offshore wind farm was constructed. These show the number of day trips to North Norfolk increased by 815,000 between 2015 and 2017 (+11%) and the number of overnight trips increased by 62,000 (+10%). In both cases, this was considerably higher than the national average. For example, the number of day visits in Great Britain as a whole increased by only 2%.</li> </ul>

ID	Stakeholder Comment	Applicant Response
		<p>No evidence has been presented to support the assertion that the impacts on tourism have been underestimated by the Applicant. The Applicant would refer to paragraph 5.12.7 of the Overarching National Policy Statement EN-1 which states “The IPC may conclude that limited weight is to be given to assertions of socio-economic impacts that are not supported by evidence (particularly in view of the need for energy infrastructure as set out in this NPS)”</p>
2	<p>The Applicant referred to a report by Biggar Economics Wind Farms and Tourism Trends in Scotland (July 2016). NNDC dispute the relevance of the Biggar Report and agreed to provide extracts of NNDC’s observations to the Biggar Report from its Local Impact Report for Norfolk Boreas scheme. These are attached at Appendix B (see paragraphs 14.6 and 14.7)</p>	<p>NNDC’s critique relates to a 2016 study by Biggar Economics which focused on the impact of onshore wind farms on tourism employment in the areas where the turbines were visible. The main criticisms are that it:</p> <ul style="list-style-type: none"> <li>• relates to onshore wind farms rather than offshore wind farms</li> <li>• focuses on impacts during the operational phase of wind farms due to visual impacts rather than the effects of disruption to visitors during the construction phase</li> <li>• relates to Scotland and uses a sector definition of ‘sustainable tourism’ that is not relevant to general impacts on tourism in North Norfolk.</li> </ul> <p>As noted in the response to comment 1, Biggar Economics produced a similar analysis in 2020 which focuses specifically on trends in tourism employment during the period when new offshore wind farms were constructed. Therefore, this addresses many of the criticisms by NNDC. As noted in the response to ID 1, this study finds no evidence of a negative impact on tourism during the construction period of these offshore wind farms.</p>
3	<p>NNDC suggest that the lack of available evidence does not mean that there will conclusively be no harm to tourism dependent businesses during the construction phases of NSIP windfarm schemes either individually or cumulatively. It is simply that, a lack of collated evidence. NNDC would welcome a commitment from Equinor to contribute towards further studies which will help establish conclusively the impact of offshore wind during the construction phase on tourism dependent businesses. This evidence will prove invaluable for future NSIP projects.</p>	<p>The Applicant is willing, in principle, to contribute to further studies to assess the impact of offshore wind on tourism, as set out in its response to Q2.22.1.1 [REP3-101] and would welcome further dialogue with NNDC on this matter.</p>