



# Triton Knoll Offshore Wind Farm Limited Triton Knoll Electrical System

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## Appendix 10: Tourism Clarification Note

Date: 1<sup>st</sup> February 2016

Appendix 10 of the Applicant's  
Response to Deadline 5

Triton Knoll Offshore Wind Farm Limited

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Date: 1<sup>st</sup> February 2016

Triton Knoll  
Offshore Wind Farm Limited  
4<sup>th</sup> Floor One Kingdom Street  
Paddington Central  
London  
W2 6BD

T: 0845 026 0562  
Email: [info@tritonknoll.co.uk](mailto:info@tritonknoll.co.uk)

[www.rweinnogy.com/tritonknoll](http://www.rweinnogy.com/tritonknoll)

Drafted By:	TKOWFL
Approved By:	Kim Gauld-Clark
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## 1. Issue-specific hearing: local impacts (19 January 2016)

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- 1.1 At the Issue Specific Hearing on 19 January 2016 to consider local impacts, Lincolnshire County Council ("LCC") sought to raise concerns in relation to the impact on tourism that the Applicant's proposal may have. In particular, LCC was concerned that the impacts on tourism relating to the Lincolnshire Coastal Country Park ("LCCP") have not been adequately considered by the Applicant.
- 1.2 Specific points that LCC raised at the hearing which this document seeks to address are as follows:
- 1.2.1. LCC submitted that the Applicant has relied upon tourism information in relation to the stretch of coastline to south of Anderby at Ingoldmells and Skegness out its environmental assessments, which LCC submits cannot be relied upon as the nature of the tourism is very different to that in the vicinity of Anderby Creek which is within the LCCP. As a result, LCC say that insufficient or no weight has been given to the impact on tourism in the north of the area, including the tourist importance of the LCCP and green tourism.
- 1.2.2. LCC submit that the impact which the Applicant's project will have on tourism will have consequential effects on the potential for the LCCP and local businesses to receive funding both from local and national sources and from Europe.
- 1.3 The Applicant can confirm that this is not the case and that the assessment of impacts on socio-economic, tourism and recreation receptors, including those raised by LCC did not use tourism information based on tourism at Ingoldmells and Skegness as this would be irrelevant. As such the assessment is adequate and appropriate and that it is based on a robust suite of baseline information and that the output of the assessment can be relied upon.

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## 2. Adequacy of assessment of the impact on tourism at the LCCP

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- 2.1 LCC has raised concerns over whether the LCCP has been given adequate weight in the Applicant's Environmental Statement ("ES") when assessing the effect of the Applicant's project on tourism in the area. As previously stated in the Applicant's Response to the Examining Authority's Question SE 2.3 at Deadline 4 (PINS Reference Number REP4-027) LCC was represented on the Evidence Plan Steering Group and in a number of relevant topic-specific review panels by specialist officers within LCC during the preparation of the Applicant's ES. In particular, a representative

from LCC attended the Human Environment Review Panel on 15 May 2014 and 30 July 2014. Topics of discussion at that Panel included coverage of tourism and recreational impact, including the level of detail to be included and spatial extent.

2.2 As set out in paragraphs 1.29 of Appendix 27 to the Applicant's Response to Deadline 2: Lincolnshire Coastal Country Park Clarification Note [ REP2-027] details of the LCCP have been taken into consideration and the LCCP formed part of the baseline study contained within Volume 5, Annex 3.1 *Socio-Economic Baseline Study of the ES* [APP-074].

2.3 Volume 3, Chapter 3 of the ES [ APP-044] considers the existing environment in relation to recreation and tourism at paragraphs 3.73 to 3.94. A list of key amenities of the study area at landfall and its immediate environs are listed at paragraph 3.90 and include:

*“Lincolnshire Coastal Country Park (LCCP) - provides facilities for visitors and enhanced nature reserves and wildlife areas. The park is defined as the 8 km stretch of coast between Sandilands in the north and Chapel St. Leonards in the south. The first of three visitor surveys (2013, 2015 and 2017) has been undertaken and key results have been used to inform the baseline and assessment (LCC, 2013c, and Mouchel, 2012).”*

2.4 A list of recreational and tourism activities that have the potential to be undertaken within the landfall area is then set out at paragraph 3.91. LCCP is also included within the preliminary list of key amenities within the onshore study area up to but not including the landfall (paragraph 3.93) and a list of recreational and tourism activities that have the potential to be undertaken within the onshore study area is then set out at paragraph 3.94.

2.5 Volume 5, Annex 3.1 *Socio-Economic Baseline Study of the ES* [APP-074] makes it clear that the baseline study also included the results of LCC's visitor survey to monitor car park usage and visitor behaviour as the LCCP developed during 2012 and 2013 (see paragraphs 1.5.66 to 1.5.70) and it was acknowledged that new and holiday visitor numbers increased between 2012 and 2013.

### **Assessment of impacts**

2.6 The impact on the LCCP during the construction, operational and decommissioning phases, as referenced in paragraphs 1.30 to 1.33 of Appendix 27 to the Applicant's Response to Deadline 2: Lincolnshire Coastal Country Park Clarification Note [ REP2-027], has been considered in paragraphs 3.148, 3.153, 3.154, 3.161, 3.169 and 3.170 of Volume 3, Chapter 3 of the ES [APP-044] and in all cases has been assessed as **“Not Significant”**.

2.7 Paragraph 3.126 of Volume 3, Chapter 3 of the ES states that:

*“There is potential for direct and indirect, temporary effects on a number of recreation and tourism activities and pursuits relevant to the offshore aspects of the development, the landfall, the onshore cable route, Intermediate Electrical Compound and the Substation.”*

2.8 With reference to the landfall aspect of the development and its impact during construction on the LCCP, paragraph 3.148 says:

*“There will be a temporary impact on the availability of a small area within the Huttoft target area of the Lincolnshire Coastal Grazing Marsh (LCGM), and on parts of the LCCP during the construction period. The areas that will be disrupted will be the areas that lie within the Proposed Development Boundary...”*

2.9 After considering the noise impacts of construction on the landfall area, paragraphs 3.153 and 3.154 then conclude:

*“3.153 A review of the other environmental assessment chapters including Chapter 2 'Landscape and Visual' and Chapter 9 'Traffic and Access' (Volume 3) has indicated that there are n' other significant residual effects in relation to recreation and tourism at the landfall....*

*3.154 The sensitivity of the relevant receptors would be medium as it relates to tourism attractions of regional importance and the assessment considers recreational users and tourists. Due to the likelihood that construction will occur during the peak tourism period (spring and summer), the magnitude of this impact on receptors (local recreational users and visitors) is medium as the impact is of regional economic importance. The overall recreation and tourism effect for the landfall is **minor adverse**, which is **Not Significant**.”*

2.10 The construction impacts in respect of the onshore cable route (outside of Landfall), Intermediate Electrical Compound and Substation are considered in paragraph 3.155:

*“Beyond the landfall area, the Proposed Development Boundary area of the onshore cable route continues through the land marked for LCCP and LCGM (Anderby/Huttoft and Burgh le Marsh target areas) as it extends inland. See Volume 5 Annex 3.1, Figure 1-4, Map 1 and 2 which shows the area of Proposed Development Boundary indicates the marked LCGM and LCCP areas...”*

2.11 After considering the potential noise impacts on certain areas, paragraphs 3.159 to 3.161 provide as follows:

“3.159 A review of other environmental assessment chapters including Chapter 2, ‘Landscape and Visual’ and Chapter 9, ‘Traffic and Access’ (Volume 3), has indicated that there are no other significant residual effects in relation to recreation and tourism along the onshore cable route, or at the Intermediate Electrical Compound and Substation.

3.160 Due to the embedded mitigation in terms of avoiding settlements and built features and amenities as far as possible, there are no other recreational and tourism features directly or indirectly affected by the Proposed Development Boundary of the onshore cable route, Intermediate Electrical Compound and Substation.

3.161 The sensitivity of the relevant receptors would be medium as there are tourism attractions of regional importance and the assessment considers recreational users and tourists. Due to the likelihood that construction will occur during the peak tourism period (spring and summer), the magnitude of this impact on receptors (local recreational users and visitors) is medium as the impact is of regional economic importance. Overall the recreation and tourism effect for the onshore cable route, Intermediate Electrical Compound and Substation is **minor adverse**, which is **Not Significant.**”

- 2.12 The impacts of the operational phase of the project have also been fully assessed with regards to their impact on recreation and tourism, at paragraphs 3.168 and 3.169:

“3.168 A review of Volume 3 Chapter 2, ‘Landscape and Visual’ and Chapter 11 ‘Noise’ ‘Environmental assessment: operational phase’ has been undertaken. All residual effects relating to potential impacts on recreation and tourism identified in these respective chapters are not significant for any elements of the Electrical System. This is applicable to the Landfall area and the Onshore Cable Route outside of the Landfall, the Intermediate Electrical Compound and the Substation.

3.169 The sensitivity of the relevant receptors would be medium as there are tourism attractions of regional importance and the assessment considers recreational users and tourists. There are not predicted to be any impacts as there is no loss or alteration of characteristics, features or elements identified, therefore the magnitude of impact is expected to be very low. Overall the recreation and tourism effect for the Landfall, Onshore Cable Route, Intermediate Electrical Compound and Substation is **negligible**, which is **Not Significant.**”

## Mitigation

2.13 Appendix 27 to the Applicant's Response to Deadline 2: Lincolnshire Coastal Country Park Clarification [ REP2-027] also deals with mitigation and residual effects relating to the LCCP. Paragraph 1.50 draws the following conclusions:

*“5) Volume 3, Chapter 2 of the ES assesses the landscape and visual impacts predicted on the LCCP. The assessment identifies some temporary significant landscape and visual effects within the LCCP during the construction of the cable route. However, embedded mitigation measures within the proposed cable route development will restore the landscape to its former condition following completion of construction and there are no predicted residual significant effects.*

*6) Volume 3, Chapter 3 of the ES assesses the tourism and recreation impacts predicted in the area of the LCCP and concludes that no significant impacts are predicted to arise from the construction, operation or decommissioning of the proposed development.”*

2.14 As demonstrated above, the Applicant has not sought to rely on information related solely to the area of Ingoldmells and Skegness to the south of the Anderby Creek and the LCCP when carrying out its assessment of the impact of its proposals on tourism and recreation. It is the Applicant's view that the area in the vicinity of Anderby Creek , including the LCCP, has been adequately assessed in its own right.

2.15 The Applicant recognises the importance of the tourism offer and the value to nature tourism provided by the LCCP. As set out above, the Applicant's assessment of the impact on the LCCP concluded that there are no predicted residual significant effects and the landscape will be returned to its former condition following completion of construction. Therefore, any impact on the LCCP and its tourism offer is temporary in nature and no long term impacts are expected.

### **Green tourism**

2.16 LCC has highlighted in Appendix 1 of its Additional Representations made on behalf of LCC (30 November 2015) at Deadline 3 [ REP3-025] that the LCCP partnership is promoting the area as a green tourism destination. Kate Percival raised concerns that in the short term there will be immediate detrimental effect through disturbance, traffic and visual image of the coast. She also submitted that new visitors will be deterred from returning and even regular visitors may not return because of indeterminate length of works.

2.17 The Applicant has responded to these concerns in its response to the Examining Authority's question SE 2.4(iv) in the Applicant's Response to the Examining Authority's Questions at Deadline 4 [REP4-027] at paragraphs 6 to 10. The Applicant's response took into account LCC's stated aims of:

- expanding tourist activities beyond the traditional bucket and spade holiday season;
- moving into green tourism;
- encouraging a healthy economy based on year round tourism; and
- developing the Coastal Country Park.

2.18 The Applicant has also been very clear about the length of works on at the landfall, the duration of PRoW closures and has set out a detailed proposal for communicating construction stage activities through the processes set out in the Outline Communication Plan (document reference 8.7.10; [APP-108]).

2.19 After consideration of the impact of the proposed closure of footpath PRoW Hutt/10/4 at Anderby Creek, the Applicant's position is set out at paragraph 10 of its Response to the Examining Authority's Questions at Deadline 4 [REP4-027]:

*"It is the Applicant's position that given the minor significance of effects on tourism during the construction phase and the continued access to the beach in close proximity to the landfall, there would be no significant impacts which would affect the aspirations of the council to expand the tourist season, move to green tourism, encourage a year round tourism or further develop the coastal country park."*

### **English Coastal Path**

2.20 LCC has indicated in its Response to the Examining Authority's Second Questions (specifically question CA 2.20) submitted at Deadline 4 [REP4-009] that the Applicant was not aware of LCC's progression of the statutory English Coastal path with Natural England under the Marine and Coastal Access Act 2009, which falls within the landfall site. LCC submit that the Applicant has not taken into account the potential relevance of and effect on this path.

2.21 At Appendix 5 of the Applicant's Response to Deadline 3: Written Summary of the Applicant's Oral Case put at the Socio-Economic Issue Specific Hearing on 19 November 2015 [ REP3-041] paragraph 1.78 sets out that the Applicant will engage with Natural England and LCC during the pre-construction phase and appropriate consultation on the suite of management plans will take place. The Applicant is confident that the Coastal Path will be given due consideration in that process.

2.22 The Applicant recognises that a key part of the tourist appeal in the area is the public access to the beach and around the coastal area in general. It is for this reason that the Applicant has made every effort to minimise temporary and permanent closure of Public Rights of Way (PRoW). The Applicant would highlight that, as set out in

paragraph 8 of the Applicant's response to Examining Authority's question SE 2.3 [REP4-027], throughout the construction period, North-South access on the beach and the sand dunes will remain open. Sheet 1 of the Public Rights of Way Plans (PINS Reference Number APP-127) demonstrates this.

2.23 It is the Applicant's position that impacts (even during construction) have been effectively minimised and that the mitigation put in place is appropriate and satisfactory.

2.24 As part of the EIA Evidence Plan process (as set out in the EIA Evidence Plan (PINS Reference Number APP-132)), areas of agreement with LCC (at Appendix I; Annex E3 of the document) included:

*"Access including Public Right of Way (PRoW) mitigation, including diversion requirements as part of the PRoW Diversion Plan"*

2.25 The Applicant has also had regard to the publications from Natural England<sup>1</sup> which consider the Coastal Path, the first of which was published on 18 September 2015 (almost five months after the Applicant's application was submitted) and updated on 3 November 2015 (stage of progress moved to stage 2: developing the route), which states:

*"Natural England has begun to investigate how to improve coastal access along a 26km stretch of the Lincolnshire coast between Skegness and Mablethorpe. This new access is expected to be ready in early 2018.*

*Officers from Lincolnshire County Council are providing Natural England with expert local advice and helping to make sure there is full consultation with local interests during the development of the route."*

2.26 The Applicant discussed the Coastal Path with the LCC PRoW Officer on 13 January 2016.

2.27 It is the Applicant's understanding that the exact route of the proposed Coastal Path is not currently known, although it is understood from discussions with LCC that Natural England prefer not to use beaches, due to the difficulty of walking on a beach.

2.28 The Applicant understands that the Coastal Path is likely to route from the South through Ande/964 (Sand Lane) and then along to the North from Moggs Eye to Marsh Yard using the existing physical pathway to the West of the dunes flood defence.

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<sup>1</sup> Found at: <https://www.gov.uk/government/collections/england-coast-path-skegness-to-mablethorpe#history>

- 2.29 The Applicant acknowledges that LCC is assisting and advising Natural England on the planning phase of the Coastal Path, that LCC will do the necessary works, part funded by Natural England, and that LCC will operate the Coastal Path once complete. LCC is therefore clearly an important stakeholder in the Coastal Path.
- 2.30 The LCC PRoW Officer has raised no obvious concerns regarding the availability of the Coastal Path to the general public during construction of the Applicant's project, as access in the area is already dealt with by the existing provisions with regard to PRoWs (for example, that Hutt/10/5 will remain open).
- 2.31 It is the Applicant's position therefore that all outstanding issues in respect of access to and use of the Coastal Path have been resolved.

### **Tourism Figures**

- 2.32 LCC has previously indicated that the figures contained at paragraph 48 of its Response to Deadline 3 (PINS Reference Number REP3-024) were taken from the LEP Strategic Plan. The Applicant requested detailed source references from LCC for the following figures (all contained in LCC's Response to Deadline 3) by email on 25 January 2016:

*"1. Tourism is worth £1.9 billion to Greater Lincolnshire (second only to food and farming);*

*2. Over 40% (£556 million) is attributable to the East Lindsey District;*

*3. Growth has been £117 million over the past five years in this area alone;*

*4. We currently attract 4 million visitors to the area predominately in summer months by road;*

*5. The recent GLNP report has shown nature tourism is worth £58 million to Lincolnshire;*

*6. The aim is to double the value of the visitor economy in Greater Lincolnshire and extending the season is critical to this;*

*7. Rural development LEADER funding of £1.3million supported 27 projects in the Coastal Action Zone specifically under related measures of tourism activities, farm diversification, micro enterprises and heritage conservation; and*

*8. Over £1.2million is allocated for 2014 – 2020."*

- 2.33 The Applicant received a response from LCC on 29 January 2016 as follows:

“1. *STEAM (Scarborough Tourism Economic Activity Monitor) 2014 Multi Area Comparison provides volume/value for tourism for Greater Lincolnshire and for each District including East Lindsey. These figures are in the latest LEP Strategic Economic Plan which is being taken to the Board this week. These figures are available on the website, but it is currently undergoing a refresh and may not contain the up to date information.*

2. *The visitor economy in Lincolnshire supports over 39,000 jobs (latest Business Register and Employer Survey BRES ONS 2014).*

3. *Final Draft Report 2015 - Greater Lincolnshire Nature Partnership's report for the Local Enterprise Partnership on the value of nature tourism.*

4. *Greater Lincolnshire Destination Management Plan and Priorities – this is the LEP sector plan for tourism and is on the Greater Lincolnshire LEP website. It includes extending the season as a priority.*

5. *A4 final pdf version booklet v5 May 2014 – LEADER projects.*

6. *LEADER info for 2014-2020 allocation.”*

2.34 The Applicant then received copies of the documents listed above from LCC by email at 10.05am on 1 February 2016, but notes that the document referred to in numbered point 2 above has not been provided.

2.35 The Applicant notes that in fact none of the documents referenced above are the existing LEP Strategic Plan, which is where it had previously been led to believe the figures came from. LCC have not submitted any of the above documents to the Examining Authority and where documents are not publicly available, the Applicant had not previously been able to consider them.

2.36 As referenced throughout this document, the Applicant has recognised the value to the local area of the tourism industry and acknowledges that the visitor economy is extremely important to Greater Lincolnshire. In order to provide as full a response as possible to the figures provided by LCC, the Applicant has provided a more detailed response to the latest information received from LCC below. However, because the documents were only provided on 1 February 2016 the Applicant reserves the right to add to the below submissions once it has had an opportunity to further consider the documents in greater detail.

2.37 In respect of LCC’s document numbered 1 above:

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2.37.1. The Applicant has reviewed the STEAM (Scarborough Tourism Economic Activity Monitor) 2014 Multi Area Comparison provided by LCC against the figures previously quoted by LCC and would make the following comments:

- In response to LCC's submission that "tourism is worth £1.9 billion to Greater Lincolnshire (second only to food and farming)", the Applicant agrees that the STEAM document indicates that the "total economic impact" on Greater Lincolnshire of tourism during 2014 is stated to be £1,947,264,000. There is no reference in the STEAM document to that figure being somehow second to food and farming. Food and farming is not referenced in that document.
- In response to LCC's submission that "over 40 % (£556 million) is attributable to the East Lindsey District", the Applicant agrees that the STEAM document indicates that the "total economic impact" on East Lindsey District Council of tourism during 2014 is stated to be £555,985,000. However, as an overall percentage of £1,947,264,000, the East Lindsey District Council contribution is stated to be 28.6% rather than 40% and so the Applicant submits that the 40% quoted is not accurate.
- In response to LCC's submission that "growth has been £117 million over the past five years in this area [East Lindsey District Council] alone", the Applicant agrees that the STEAM document indicates growth of £117,138,000 between 2009 and 2014 in the East Lindsey District Council area.
- In response to LCC's submission that "we currently attract 4million visitors to the area predominately in summer months by road", the Applicant assumes that the 4million figure quoted is the figure for "staying visitors", which is indicated by the STEAM document to be 4,332,000. It is not apparent where the reference to the visitors arriving predominately in the summer months by road has been taken from. The STEAM document does not refer to different seasons or visitor modes of transportation.

2.37.2. LCC has acknowledged that these figures are not available on the LEP website. LCC has also acknowledged that the latest version of the LEP Strategic Economic Plan to which LCC have referred has not been approved by the LEP board yet and the Applicant has been unable to locate that Plan on the LEP's website. The Applicant was only able to consider the documents that were publicly available at the time the ES was prepared.

2.37.3. The Plan that is available on the LEP's website (as at 1 February 2016) is dated 31 March 2014. The Applicant has considered this Plan previously and this is referenced in previously submitted material, such as paragraph 3.73 of Volume 3, Chapter 3 of the ES [ APP-044]:

*“Lincolnshire is the 4th most popular coastal county in the UK (Greater Lincolnshire LEP (2014) for tourism. There is a large seasonal tourism industry, drawn largely by the coast and marine environment. The number of visitors to Lincolnshire as a whole was estimated at 17.4 million in 2012, which was an increase from 17 million in 2011 (Greater Lincolnshire LEP, 2013). There is currently a drive towards the improvement of recreational and tourism amenities with the aim of attracting higher numbers of visitors and increased revenue from the visitor economy (Greater Lincolnshire LEP, 2014).”*

2.37.4. The LEP's Strategic Economic Plan has also been referenced in Volume 5, Annex 3.1 *Socio-Economic Baseline Study* of the ES (PINS Reference Number APP-074) at paragraph 1.5.34:

*“The Strategic Economic Plan, Part 1: Our Plan, prepared by Greater Lincolnshire LEP (2014) provides an overview as to existing investment which is being made to further encourage the tourism sector in the county. The strategy indicates that approximately £20 million is being invested in a range of projects in the county, including the opening of a purpose-built Magna Carta Vault in Lincoln, encouraging visitor numbers at Lincoln Castle and strengthening the county's role as a major UK centre for short breaks...”*

2.37.5. The *Socio-Economic Baseline Study* also recognises at paragraph 1.5.13 that:

*“...recreation and tourism brought just over £1 billion revenue into Lincolnshire in 2012 (Greater Lincolnshire LEP, 2013). Based on Visit England statistics, recreation and tourism revenue has decreased since 2008 when visitor expenditure was £1.33 billion (Visit England (2009). In 2012, tourism was thought to employ approximately 39,000 people in Lincolnshire (Greater Lincolnshire LEP, 2013) ... ELDC indicate in the Economic Baseline March 2010 that the coast is dominated by tourism, and strong employment growth has been witnessed over recent years and is worth more than £400m to the local economy. Skegness is the principal tourist destination and is particularly reliant on the tourism sector against comparator seaside areas (ELDC, 2010).”*

2.38 With regards to LCC's document numbered 2 above:

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2.38.1. The Applicant has also referenced the statistic that the visitor economy in Lincolnshire supports over 39,000 jobs (see paragraph directly above). LCC has not provided the document which their quoted figure is stated to be taken from but as the figure accords with that which the Applicant has previously considered then the Applicant has no further comment on this figure.

2.39 In respect of LCC's document numbered 3 above:

2.39.1. The Applicant has not been able to locate the "Final Draft Report 2015" of the Greater Lincolnshire Nature Partnership (GLNP) in any publicly available forum. The GLNP's website (as at 1 February 2016) includes the following "latest news" from 12 November 2015:

*"New figures have revealed that nature tourism is worth £58million a year to the economy of Greater Lincolnshire.*

*This headline figure comes from research commissioned by the Greater Lincolnshire Nature Partnership (GLNP) to place a value on the contribution made by nature tourism to the overall visitor economy of Lincolnshire, North Lincolnshire and North East Lincolnshire and to look at barriers and opportunities for developing this as an integral part of Greater Lincolnshire's tourism sector.*

*The report's findings were announced at the GLNP's fourth annual conference entitled 'The value of nature tourism' held at The Brackenborough Hotel near Louth on 12 November.*

*The keynote was given by the report's author Dr Simon Woodward from Leeds Beckett University who undertook the research.*

*Dr Woodward said: "Our research suggests that nature tourism in Greater Lincolnshire already generates around £58 million for the economy every year, supporting more than 850 jobs. It is important, therefore, that we make the most of the opportunities that exist to get visitors to think a little bit more about the landscapes they are enjoying and the wildlife that lives here."*

2.39.2. The Applicant has been provided with what is stated to be the final draft of the GLNP report from LCC. Having reviewed this document, the Applicant notes that it still appears to be very much in draft form, including comments running throughout the document. Of note is that the document does not refer to a figure of £58million, as quoted by LCC. Appended to this Note is an extract from that document (pages 21 - 22) which includes the following wording:

.....

*“...Using the STEAM 2014 data and applying it to the above calculations on the volume of activity generates a figure of around £318 million gross economic impact of nature tourism (and day visits linked to enjoying nature) in Greater Lincolnshire. Of this, around £38.8 million would appear to be linked to trips made where wildlife viewing is the purpose of the trip.”*

2.39.3. The data on which the above statement relies is taken from two tables (Figure 16 and Figure 17) and the comment which has been added to Figure 16 states *“I cannot make the figures add up correctly. If this is % involved in wildlife viewing of the first column then it doesn’t work for this column”*. The comment in relation to Figure 17 then states *“If the numbers above are inaccurate then these columns are inaccurate.”*

2.39.4. In addition, the document admits that the figures are likely to be *“a considerable overestimate of the ‘true’ impact of nature tourism to the economy of Greater Lincolnshire for a number of reasons...”* and that *“in terms of public consumption of this data, we would recommend emphasising the figure of around £38 million as the gross economic value of wildlife tourism to the study area, and the much larger figure of £318 million as the potential value of all countryside-based recreation and leisure across Greater Lincolnshire.”*

2.39.5. The Applicant would therefore suggest that very little reliance should be placed on this draft document and in particular, the Applicant notes that the £58 million figure quoted by LCC has not been supported by this document in any case.

2.40 In response to LCC’s document numbered 4 above:

2.40.1. The Applicant notes that LCC references the LEP’s *“Greater Lincolnshire Destination Management Plan and Priorities”* document. One of the strategic priorities identified in that document is *“Strategic Priority 6: Tourism Performance & Impacts: The balance of volume and value, the advantage and chance of increasing spend per head. Opportunities to increase the level of tourism spending retained locally, for example through local supply, priorities towards staying as against day visitors, and increasing length of stay, lengthening the season.”*

2.40.2. The Applicant has acknowledged the importance of the tourism industry and visitor economy to Greater Lincolnshire at paragraph 3.73 of Volume 3, Chapter 3 of the ES (PINS Reference Number APP-044) where it states that *“there is currently a drive towards the improvement of recreational and tourism amenities with the aim of attracting higher numbers of visitors and increased revenue from the visitor economy (Greater Lincolnshire LEP, 2014). There are*

.....

*aspirations in the form of potential proposals to improve the infrastructure within the local area to support and further encourage an increased visitor level, such as the Skegness western relief road (Vision for Skegness, 2013)."* Therefore, the impact of the Applicant's proposal on the visitor economy in Greater Lincolnshire has been taken into account as part of the assessment conducted in the Applicant's ES.

2.41 In respect of LCC's document numbered 5 above:

2.41.1. In response to LCC's submission that "Rural development LEADER funding of £1.3million supported 27 projects in the Coastal Action Zone specifically under related measures of tourism activities, farm diversification, micro enterprises and heritage conservation", the Applicant notes that the document provided is different to the version of the document that is publicly available. The published document does not distinguish between the different RDPE Measures which are met by each individual project and so the Applicant has not been able to consider these previously.

2.41.2. In the version of the document which has been provided to the Applicant, there are 27 projects which are given as examples of projects which have been supported by RDPE funding in the Coastal Action Zone. However, the number of those projects which meet the "encouragement of tourism activities" Measure is 12 (rather than 27) and the grant funding provided to those 12 projects is £782,695.59, rather than the £1.3 million quoted by LCC.

2.41.3. The Applicant considers that the figures quoted by LCC are misleading in terms of their relevance to tourism-related funding only and the Applicant has fully considered any impact which its proposals may have on funding at section 3 below.

2.42 With regards to LCC's document numbered 6 above:

2.42.1. The Applicant has not previously been able to consider this document because it does not appear to be publicly available. The Applicant has been provided with an undated word document with no indication of where the information has been taken from, whether it has been verified or whether it is publicly available.

2.42.2. In response to LCC's submission that "over £1.2million is allocated for 2014 – 2020", the Applicant would agree that the document provided does indicate that £1.28 million has been allocated to the Coastal Action Zone. However, an analysis of the remainder of the document indicates that only £247,248 of that total sum has been allocated to "support for rural tourism" in the

Coastal Action Zone, with an aim to support 8 projects and create 3 new jobs. The remainder of the total sum is distributed between other priorities such as support for increasing farm activity and support for increasing forestry productivity.

2.42.3. Similar to the previous document, whether or not the funding figures quoted by LCC are misleading in terms of their relevance to tourism-related funding only, the Applicant has fully considered any impact which its proposals may have on funding at section 3 below.

2.43 The Applicant has also provided its own figures (taken from documents which were publicly available at the time of the preparation of the ES) at paragraphs 14 to 18 of the Applicant's Response to the Examining Authority's Question SE 2.3 at Deadline 4 (PINS Reference Number REP4-027).

#### **Engagement with Greater Lincolnshire Local Enterprise Partnership**

2.44 As set out at paragraph 5 of the Applicant's Response to the Examining Authority's Question SE 2.3 at Deadline 4 (PINS Reference Number REP4-027) following Deadline 4, the client will seek to discuss the assessment of tourism effects with Greater Lincolnshire Local Enterprise Partnership (LEP). In addition to dealing with any concerns the LEP may have, the discussions will seek to ensure that the economic benefits of the project are realised within the local area.

2.45 At the Issue Specific Hearing on 19 January 2016 the Examining Authority sought an update from the Applicant on any discussions or meetings with the LEP. The Applicant confirmed that after several attempts to make contact a response had been received from the LEP and that the Applicant hopes to meet with the LEP in the very near future.

2.46 The Applicant has reviewed the LEP's Strategic Economic Plan (March 2014)<sup>2</sup> which contains five key "outcomes and strategies", set out in Part One of the Plan (page 14). Two of these outcomes ("Greater Lincolnshire's homes and communities" and "A location for investors") are not directly related to the Applicant's proposals but the remaining three outcomes significantly align with the Applicant's project and therefore the Applicant intends to engage with the LEP with a view to both parties working together.

2.47 The three outcomes which the Applicant believes it can contribute towards are:

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<sup>2</sup> [http://www.greaterlincolnshirelep.co.uk/assets/downloads/Strategic\\_Economic\\_Plan\\_2014.pdf](http://www.greaterlincolnshirelep.co.uk/assets/downloads/Strategic_Economic_Plan_2014.pdf)

- 2.47.1. **"Greater Lincolnshire's important sectors"** - this outcome states that the LEP will make real effort to drive growth in the three sectors it has the most competitive advantage in. One of these in particular is "power engineering". This is of great interest to the Applicant as it would wish to explore how it can work with the LEP to develop local skills and thereby ensure that local people and businesses can benefit from the opportunities that the project will present;
- 2.47.2. **"Greater Lincolnshire's Emerging Sectors"** – two of the three sectors highlighted in this outcome and strategy are "low carbon" and "ports and logistics". In particular, the description of the "low carbon" sector indicates that Lincolnshire's coastline has proximity to offshore wind growth zones and that Greater Lincolnshire has real resources and competitive advantage in leading the move to a low carbon economy. This again demonstrates that the objectives of the LEP and the Applicant are very closely aligned. The Applicant's offshore wind farm is clearly a low carbon initiative and the Applicant is keen to understand how the LEP can support it. The Applicant wishes to work with the LEP to stimulate the interest of local resources to engage with the project and is also keen to understand how the LEP can work with the Applicant to support the use of facilities at local ports for construction and operation.
- 2.47.3. **"Growing Greater Lincolnshire's businesses"** – in order to ensure that Greater Lincolnshire's businesses are not left behind, the LEP states that it will promote tailored activity in several areas including skills and innovation. The Applicant is extremely keen to develop local skills to ensure that local businesses can successfully compete for contracts in support of the project. The Applicant is also eager to encourage innovation on the project, particularly in helping to reduce the cost of energy. The Applicant would be delighted to engage with the LEP to understand how both parties can work together to satisfy their shared goals.

2.48 The Applicant is continuing to engage with the Greater Lincolnshire Local Enterprise Partnership. Please see the Local Impacts Issue Specific Hearing Summary, at Appendix 1 of the Applicant's submission to Deadline 5 for further details.

### 3. Funding for the LCCP

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- 3.1 LCC has repeatedly submitted that the Applicant's project will result in a 'degraded' landscape, which will have an impact on the funding opportunities for the area and local businesses, as it is promoted as an unspoilt, pristine environment. LCC refers to the submissions of Miss Kate Percival (Appendix 1 of the Additional Representations made on behalf of LCC (30 November 2015) at Deadline 3 (PINS Reference Number

- REP3-025)). Miss Percival submits that if the area is perceived to have a degraded landscape, this may deter future external investment and grant funding and the possibility of losing current potential investment from charity. The document also sets out that funding is largely based on achieving certain outcomes in relation to increasing visitor numbers and creating new direct/indirect employment opportunities. As a result, Miss Percival says, grant aid could be reclaimed from the LCCP and possibly local businesses if outcomes are not achieved.
- 3.2 Miss Percival goes on to say that whilst new businesses are being established in the area due to the increase in visitor numbers, the Applicant's works could damage the image of the area, deter visitors and mean that businesses will lose confidence in their new ventures and/or put them on hold (Appendix 1 of the Additional Representations made on behalf of LCC (30 November 2015) at Deadline 3 (PINS Reference Number REP3-025)).
- 3.3 LCC has stated that it would consider its future financial support of the LCCP because of the impact on it caused by the Applicant's proposals and that any funds spent so far on the improvements to the LCCP would effectively be abortive (paragraph 44 of the Additional Representations made on behalf of LCC (30 November 2015) at Deadline 3 (PINS Reference Number REP3-024)).
- 3.4 The Applicant notes that neither LCC nor Miss Percival has given any examples of comparable situations where such a withdrawal of funding has occurred in similar circumstances and the assertions set out are based solely on assumptions. In any case, for the reasons given below, the Applicant does not anticipate that its works will have the negative impact on funding, both at a local, national and European level, that LCC and Miss Percival have asserted.
- 3.5 Paragraph 1.83 of Appendix 5 of the Applicant's Response to Deadline 3: Written Summary of the Applicant's Oral Case put at the Socio-Economic Issue Specific Hearing on 19 November 2015 (PINS Reference Number REP3-041) sets out the Applicant's position that the location of the infrastructure at landfall and the cable route has been carefully sited and designed in order to minimise impacts on the environment and the tourism industry.
- 3.6 Paragraphs 6 to 12 of the Applicant's Response to the Examining Authority's Question SE 2.3 at Deadline 4 (PINS Reference Number REP4-027) sets out the ways in which the Applicant is seeking to mitigate the effects of the scheme on tourist destinations, including the LCCP and other nature/green tourist attractions.
- 3.7 In addition, the Applicant has considered the aims of the Revised Business Plan 2013-2018 for the LCCP and how its proposed development may affect those aims at paragraphs 1.33 to 1.42 of Appendix 6 to the Applicant's Response to Deadline 4: The

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Applicant's Response to LCC's Response to Deadline 3 (PINS Reference Number REP4-033).

3.8 As stated at paragraph 1.43 of that document, the Applicant is extremely mindful of the importance of tourism and recreation in Lincolnshire. As part of preparing its ES, the Applicant carried out a detailed desk-based impact assessment which identified the LCCP as a tourism-related receptor. Embedded mitigation has been put in place, including:

- Careful routing of the cable route to avoid areas of built environment, including sport, leisure and recreational facilities
- Use of HDD techniques at all road crossings and main watercourses
- On-going liaison with statutory and non-statutory consultees, stakeholders and the general public
- Burial of the onshore cable under the sand dunes using trenchless techniques
- With the exception of Hutt/10/4, all PROWs will be kept open or diverted to minimise impact on users
- Use of artificial light will be minimised to that required for safe working
- Nearby Caravan Parks, chalet sites will be informed of all construction activities which may affect their usual operations and activities.

3.9 As set out in chapter 3 of the ES (PINS Reference Number APP-044) and paragraph 1.49 of the Applicant's Response to LCC's Response to Deadline 3 (PINS Reference Number REP4-033), the Applicant does not anticipate any significant adverse effects on tourism. Therefore, the Applicant does not anticipate that there will be any adverse effects on any of the funding available to the LCCP.

**Annex 1:** Extract from draft Greater Lincolnshire Nature Partnership Report provided to the Applicant by LCC on 1 February 2016

is associated with enjoyment of, and engagement with, the natural environment and wildlife.

As indicated in Section 3, we have not been able to identify any specific surveys of trip-making habits across the whole of the study area and thus have been obliged to refer to alternative survey findings to provide approximations of the patterns in Greater Lincolnshire.

Using relevant data sources, we have estimated that around 5.6 million visitors to Greater Lincolnshire engage with the natural heritage in a purposive way during their time in the area, whether this is on a day trip or a longer, overnight stay (Figure 16). Of these, around 10% are actively engaged in viewing wildlife whilst the remainder are enjoying the region's many varied landscapes and habitats.

**Figure 16: Estimate of volume of nature and wildlife tourism across Greater Lincolnshire**

	Number in Greater Lincolnshire	% engaging with natural heritage	Estimated number engaging with natural heritage	% involved in wildlife viewing	Estimated number engaging with wildlife
Day visitors	27,026,000	18.7%	5,053,862	3%	458,100
Staying visitors	4,332,000	14%	606,480	4%	99,240
Total	31,358,000		5,660,342		557,340

**Comment [FH32]:** I cannot make the figures add up correctly. If this is % involved in wildlife viewing of the first column then it doesn't work for this column.

Source: Report authors

Translating the above into an estimate of the total economic impact is theoretically relatively simple as one multiplies the number of trips linked to engagement with wildlife and nature by the average impact per trip (Figure 17).

Using the STEAM 2014 data and applying it to the above calculations on the volume of activity generates a figure of around **£318 million gross economic impact of nature tourism** (and day visits linked to enjoying nature) in Greater Lincolnshire. Of this, around **£38.8 million** would appear to be linked to trips made where wildlife viewing is a purpose of the trip. The 2014 STEAM report uses an employment multiplier of approximately £67,000 per FTE for combined direct, indirect and induced employment linked to tourism and day visitor spending in the area, suggesting that nature and wildlife tourism across Greater Lincolnshire currently supports around **4,750 FTE jobs** across the area.

**Figure 17: Estimated total economic impact of nature tourism in Greater Lincolnshire**

	Number of nature tourists in GLNP area	Total economic impact per trip	Impact of ALL nature tourism visitors	Number of people viewing wildlife in GLNP area	Impact of only wildlife viewing
Day visitors	5,053,862	£35.91	£181,473,589	458,100	£16,449,411
Staying visitors	606,480	£225.20	£136,581,722	99,240	£22,349,245
Total	5,660,342		£318,055,311		£38,798,656

**Comment [FH33]:** If the numbers above are inaccurate then these columns are inaccurate

**Comment [FH34]:** Which this? There are two numbers, one which has been created as before and a new one. The one which is as before you said was a modest number and an underestimate. I can understand however how the new number is an overestimate. It seems unfair to base all of the comments below on the larger number when this conflicts the over-riding impression everyone got from the conference from the smaller number. Can both be reflected?

Source: Report authors

However, this is likely to be a considerable overestimate of the 'true' impact of nature tourism to the economy of Greater Lincolnshire for a number of reasons:

- The estimates of the total number of tourists and day visitors engaging in some form of nature tourism activity do not differentiate between those for whom it was a primary

Could it be restructured perhaps describing the larger number first and how this is an overestimate. The smaller number could be described second as an underestimate and only including nature tourism and thus should be the last and lasting impression that people are left with, as at the conference.

purpose and those for whom it was a secondary motivation for the trip – thus it likely to overplay the real significance of the current nature tourism product (in whatever form it takes) in terms of its appeal to visitors

- The average economic impact per trip data used is very likely to overestimate considerably the real situation on most leisure day trips, particularly for the kinds of activities undertaken on such trips and recorded in the **GBDVS** reports (see Figure 9). Many of these day trips may be taken from home and will involve little if any spending. Thus using the estimated impact for all day visits is likely to skew the results by a considerable margin
- Similarly, the impact for tourists is likely to be an overestimate since it assumes that the total impact of the stay is associated with nature tourism, when in reality this may only have been one of many different activities undertaken during the stay in Greater Lincolnshire. Again, this is likely to have delivered a far higher figure than is the case in reality
- The average round trip on a leisure day trip in Great Britain is 44 miles (**TNS, 2015**) thus most of the day trips made within Greater Lincolnshire will be by local residents. Thus even though they may be spending money on a trip, it is merely being recycled within the regional economy – it is not additional spending

~~In order to provide a~~ more reliable ~~(and modest)~~ figure for the value of nature tourism to Greater Lincolnshire requires access to detailed survey data on day visitor and tourist motivations and trip making patterns – information that is not currently available in a form that could be used to advise this research project. We strongly recommend that such data is gathered in the coming years to allow a more refined projection of the value of nature tourism to Greater Lincolnshire to be calculated.

**In the meantime, in terms of public consumption of this data, we would recommend emphasising the figure of around £38 million as the gross economic value of wildlife tourism to the study area, and the much larger figure of £318 million as the potential value of all countryside-based recreation and leisure across Greater Lincolnshire.**

#### 4.4 Concluding Remarks

Based on our initial desk-based analysis, we estimate the current value of nature based tourism and leisure activity to Greater Lincolnshire could be as much as £318 million of which £38 million is associated with holidays and day trips where engaging with wildlife is the primary purpose. Day visitors are by far the largest single market in volume terms, but the staying (tourist) market is almost its equal in terms of overall economic impact.

Thus efforts to increase the value of nature tourism across Greater Lincolnshire need to consider not only these two broad segments, but also the niches within each group. For the day visitor market, attracting residents of surrounding counties into Greater Lincolnshire (e.g. East Yorkshire & Humberside; South Yorkshire; Nottinghamshire, Cambridgeshire, Norfolk and Rutland) will increase the additionality element of day visitor spending. At the same time, efforts should also be made to retain the local resident market to reduce leakages out of the economy. Converting existing day visitors into overnight guests will lead to an increase in average spend per head, no matter what type of accommodation is used. For the tourist market, attempts must be made to target users of all accommodation types (serviced, non-serviced or SFR) as they are all important components of the overall visitor mix. Tactics for tackling these sectors are put forward in the recommendations that conclude this report.

In the following section, we briefly review the main findings of the questionnaire surveys of LWT members and GLNP stakeholders to provide guidance on the key issues they perceive relate to the development of nature tourism in Greater Lincolnshire.