

Lincolnshire County Council supplemental response indicated in the document submitted for Deadline 5- sections omitted from the original document

1. Lincolnshire County Council comments on Lincolnshire Coastal Country Park

- 1.1 The County Council acknowledge that the applicant has listed some of the concerns raised by the County Council at the hearings within the documents at paragraph 1.30, however the County Council consider that the applicant has not fully appreciated and considered the effects of the scheme on the Lincolnshire Coastal Country Park (LCCP).
- 1.2 In particular the County Council feels that the LCCP has been treated as a matter of little significance as references have been made within the document to the fact that it is a " council promoted project with no national or local statutory designations" (paragraph 1.50). This is incorrect it is a long term landscape scale initiative that is being developed by a partnership of eight organisations, East Lindsey District Council, Environment Agency, Lincolnshire County Council, Lincolnshire Wildlife Trust, Lindsey Marsh Drainage Board, National Farmers Union, Natural England and National Trust, working together to deliver a shared vision.
- 1.3 At paragraph 1.37 the Applicant has listed the aims of the LCCP, in that it does not consider that the proposed development will affect the LCCP's aim to support and encourage a healthy local economy based upon a year round sustainable tourism destination. The County Council are of the view that the LCCP is a pristine area of undeveloped coast that is valued by residents and visitors for its peaceful tranquil environment. The partnership is developing and promoting the area as a green tourism destination.
- 1.4 The LCCP Socio- Economic Baseline Report 2020 projects an increase in visitor numbers (60,000 pa by 2020 and generating £2.2 m) . The County Council are concerned that this development will damage the image of the area, deterring visitors which will lead to a reduction in visitor spend which will have a detrimental effect on the local economy that already suffers from deprivation.
- 1.5 At paragraph 1.40 the applicant acknowledged "that users of the LCCP are expected to experience notable change to the character and quality of their view during construction and that users will experience a moderate adverse level of effect considered to be significant and that through mitigation there are no predicted residual significant effects". Construction works will be taking place within the LCCP for a long period of time. This will have a residual significant effect on the area. It is seen as a pristine coast line attracting visitors throughout the seasons to enjoy the landscape

and unspoilt natural environment. It will be perceived as a scarred landscape for many years.

- 1.6 The applicant has not fully acknowledged or addressed the following concerns that were made:-
- (a) The possibility of existing grant funding being reclaimed as a result of not achieving predicted outcomes in relation to an increase on visitor numbers and the creation of new/ indirect employment opportunities as a result of the construction works.
 - (b) The ability to continue to attract future partners, LCC , National and EU grant sources to deliver the LCCP vision, if the area is perceived to have a degraded landscape rather than existing pristine unspoilt image. Without external funding the partnership cannot justify funding future LCCP development schemes.
- 1.7 Within the document further references are made to supplemental documentation submitted as part of the application, reliance is placed by the applicant upon these documents that they have considered and can justify the development within the LCCP. Upon further examination it appears that a fleeting consideration has been given to the LCCP and an in depth consideration of the effects has not taken place.

2. Lincolnshire County Council comments on Outline Soil Management Plan (Rev B)- (paragraph 68)

The ALO role and pre-construction surveys

- 2.1 Lincolnshire County Council are of the view that the applicant will require more than one ALO as indicated at paragraph 2.1 and are concerned that a single ALO will not have the capacity to deal with the entire scheme.
- 2.2 The applicant has indicated at paragraph 2.7 that the ALO will be the point of contact for landowners and that they will be available during working hours. The Council are of the view that this is not sufficient and would suggest that they are available at all times and in case of an emergency should it arise. This view was echoed at the recent hearings by landowners and agents.
- 2.3 The applicant has indicated at paragraph 2.17 that they will produce and keep a written record of the pre-entry condition and that a copy will be provided to the relevant landowner, the County Council consider that this should occur before entry is taken to the land.

General Construction Methodology

- 2.4 The applicant has indicated at paragraph 3.6 that the working width will generally be no wider than 60 metres. The County Council are of the view that the DCO and associated compulsory acquisition of land will, other than for a short stretch of greater width, be limited to the 60 metre width

and therefore no excess can be used or acquired without the relevant landowners consent.

- 2.5 The applicant indicates at paragraph 3.4 that the cable installation will take up to 42 months however, documentation submitted as part of the application indicate that this is only partially correct. With activity being 43 months over a 54 month period , but section 3 of the cable that the activity increases to 54 months over a 60 month period and at the substation 65 months activity over a 71 month period.(figures from table 1.2 Onshore project description 6.2.3.1 APP-042)
- 2.6 The applicant indicates at paragraph 3.5 that the works will only take place Monday to Saturday with no work on a Sunday, but is silent about Bank Holiday working in contrast to the Statement of reasons at paragraph 1.19.
- 2.7 The applicant has indicated at paragraph 3.7 that within the documentation that a temporary haul road will be constructed, however the documentation submitted shows the width of the road to vary from 6.0m (para 3.62) to 6.8m (SOR para 4.36).

Agricultural Land Drainage

- 2.8 Clarification is sought that " the independent drainage expert appointed" for the detailed design process will be a different expert that will be appointed for the dispute resolution process.(Paragraphs 4.5- 4.6)
- 2.9 The Council is concerned that the compensation for loss or damage will be paid upon the proven business loss basis, caused as a direct result of the use of the easement strip. The Council considers that the losses should be paid and we disagree that they should be paid only when it is proven to be a business loss. In addition it would assist all parties if a standard agreed form could be submitted as the claim. The documentation does not make it clear what period the losses will be paid for, given that the scheme is intended to continue for a significant period and the applicants are suggesting the use of a 99 year lease of the land.

Soil management

3. The County Council are concerned that it is extremely unlikely to be possible that post- restoration of soils will be returned back "to at least the equivalent to those recorded in the pre- entry record of condition". In addition, it may not be the landowner who is affected; it may be the person who is in occupation of the land. As the majority of farms within the County Councils ownership are tenanted.

Question no	Question	Lincolnshire County Council's Response
DCO	Draft Development Consent Order	
DCO3.1	<p>The ExA have issued their recommended draft Development Consent Order (DCO) in the form of a <i>Schedule of ExA's recommended amendments to the Applicant's draft DCO version F</i>.</p> <p>a) All parties are requested to provide comments and, if relevant, suggestions for amendments to the entirety of the ExA's recommended draft DCO.</p> <p>b) In particular, all parties are requested to provide comments and, if relevant, suggestions for amendments to wording to the ExA's recommended additional wording, including a recommended new Requirement on local employment.</p> <p>c) All parties are also requested to check the <i>Schedule of ExA's recommended amendments to the Applicant's draft DCO version F</i> taken with the Applicant's Revised draft DCO [REP5-035] and inform the ExA if they consider that any matters that they have raised in respect to the draft DCO during the course of the Examination have not been dealt with.</p>	<p>(a) The County Council is satisfied and has no comments to make subject to that below</p> <p>(b) The County Council would request that the written scheme for the promotion of employment that the LEP are consulted and that the final approval is given by the local planning authority.</p> <p>(c) The County Council is content.</p>
DCO3.2	<p>The Applicant's <i>Revised draft DCO</i> [REP5-035] included an amended version of the Restrictive Covenant at Schedule 5. This is included unchanged in the ExA's recommended draft DCO at this stage.</p> <p>The ExA requests that all parties including, in particular, affected landowners and tenants provide comments and, if relevant, suggestions for amendments to wording to the draft Restrictive Covenant.</p>	<p>The County Council has been engaging with the applicant and the restrictive covenant contained within the revised draft DCO does not represent the current working draft.</p> <p>As currently drafted the restricted covenant will prevent mole draining from taking place without the prior written consent of the applicant which will not be unreasonably withheld or delayed, the County Council consider that this should be removed.</p>

DCO3.12	<p>Requirement 8</p> <p>Paragraph 5.3 of the Statement of Common Ground between Triton Knoll Offshore Wind Farm Limited and Lincolnshire County Council dated 1 February 2016 [REP5-053] states:</p> <p><i>“It is not yet agreed that the wording of Requirement 8 of the draft DCO (document reference 3.1) ensures that any highways works are appropriately signed off and adequately secures an Access Management Plan (AMP), which accords with the principles set out in the Outline AMP (document reference 8.13).”</i></p> <p>LCC</p> <p>a) Explain the nature of your concerns; b) If relevant, suggest wording that would be acceptable to you; c) Indicate the likelihood of reaching agreement on this matter on, or before, Deadline 7 (24 February 2016).</p>	<p>(a) The County Council have discussed their concerns with the applicant at a meeting on 12 February 2016. In that the siting, design and layout of the accesses from the highway as indicated in the Outline Access Management Plan do not comply with the Design Manual for Road and Bridgeworks.</p> <p>In particular all accesses from the highway from TCC1 to TCC26 must be designed in accordance with the Design Manual for Road and Bridgeworks, and will be subject to the relevant stages of road safety audit conducted by the Lincolnshire Road Safety Partnership.</p> <p>The indicative layouts as proposed do not comply with current standards and do not take into account current traffic flows and speeds. The County Council accept that these are indicative layouts and that further designs will be produced but would point out that they have to be in compliance with the Design Manual for Road and Bridgeworks.</p> <p>(b) The County Council cannot suggest any relevant wording (c) It is unlikely that agreement will be reached.</p>
DCO3.13	<p>Requirement 16</p> <p>Paragraph 5.4 of the Statement of Common Ground between Triton Knoll Offshore Wind Farm Limited and Lincolnshire County Council dated 1 February 2016 [REP5-053] states:</p> <p><i>“It is not yet agreed that the wording of Requirement 16 of the draft DCO (document reference 3.1) adequately secures appropriate restrictions to the working hours permitted under the Order.”</i></p> <p>LCC</p> <p>a) Explain the nature of your concerns; b) If relevant, suggest wording that would be acceptable to you;</p>	<p>(a) This concern related to the use of specific roads, which at times are heavily trafficked. The use by construction traffic associated with the TK development could cause severe delays which would be avoided by appropriate timings. The County Council is concerned that many of the roads are traffic sensitive at specific times and the applicant is advised not to have HCV movements during these times if possible to reduce disruption both to Works and non-Works traffic.</p> <p>(b) The County Council cannot suggest any relevant wording (c) This is the only remaining concern of the County Council.</p>

	<p>c) Indicate the likelihood of reaching agreement on this matter on, or before, Deadline 7 (24 February 2016).</p>	
DCO3.14	<p>Requirement 18 Paragraph 5.5 of the Statement of Common Ground between Triton Knoll Offshore Wind Farm Limited and Lincolnshire County Council dated 1 February 2016 [REP5-053] states: <i>“It is not yet agreed that the wording of Requirement 18 of the draft DCO (document reference 3.1) adequately secures a construction phase Traffic Management Plan (TMP), which accords with the principles set out in the Outline TMP (document reference 8.9) and includes a Contractor Travel Plan (CTP).”</i></p> <p>LCC</p> <p>a) Explain the nature of your concerns; b) If relevant, suggest wording that would be acceptable to you; c) Indicate the likelihood of reaching agreement on this matter on, or before, Deadline 7 (24 February 2016).</p>	<p>The County Council and the applicant discussed this during a meeting in January to identify the problem</p> <p>(a) As currently drafted the outline Traffic Management Plan does not indicate whose responsibility it is to rectify any damage caused to the highway by construction traffic or whether the access route is suitable for the traffic being proposed to use the route. Most of the roads that are intended to be used are not of a suitable construction for the traffic that is intended to use them. Prior to the start of the onshore construction works road condition surveys must be conducted and condition agreed. Any works required to make the road suitable for the construction traffic whilst allowing safe passage to all other normal traffic must be completed prior to any construction activities being undertaken. Following completion of the relevant stage of the construction works any deterioration in the highway must be repaired to the satisfaction of the Highway Authority. The Outline Traffic Management Plan should require all detailed aspects relating to routing and access to be considered on an individual basis to ensure the suitability for purpose for each TCC. These plans should address condition, alignment requirements for strengthening and widening and be agreed by the Highway Authority. Road crossings (construction traffic) At all road crossings Condition surveys must be undertaken prior to any construction on that stage. Any strengthening or improvement works required to the carriageway, footway or verges must be carried out to the satisfaction of the Highway Authority to ensure the safety of the Highway users.</p> <p>(b) The County Council is unable to suggest any relevant wording</p>

		(c) It is unlikely that agreement will be reached.
DCO3.15	<p>Requirement 20 Paragraph 5.6 of the Statement of Common Ground between Triton Knoll Offshore Wind Farm Limited and Lincolnshire County Council dated 1 February 2016 [REP5-053] states: <i>“It is not yet agreed that the wording of Requirement 20 of the draft DCO (document reference 3.1) adequately secures the reinstatement of any land used temporarily for construction of the onshore works.”</i></p> <p>LCC a) Explain the nature of your concerns; b) If relevant, suggest wording that would be acceptable to you; c) Indicate the likelihood of reaching agreement on this matter on, or before, Deadline 7 (24 February 2016).</p>	<p>a), (b) and (c). This question has arisen from a reliance on the draft Statement of Common Ground in circumstances where it was acknowledged by both the County Council and the applicant that the Statement did not reflect the up to date situation. This matter was discussed at a meeting between the Applicant and the County Council in January and the outcome of that meeting, as set out in the resultant email exchange, was reported to the Hearing in January. The County Council concern related to post construction treatment of the surface of various access tracks in the vicinity of the POS and the County Council needed to be satisfied that it would be dealt with appropriately and that the DCO guaranteed it. The email between Mr Miller and Mr Lloyd indicates that the County Council's concerns were met and Mr Miller reported the same to the Hearing.</p>
CA	Compulsory Acquisition	
CA3.4	<p>The LCC DL 5 submission states at para 36: <i>“If the TJB are granted consent in this location the effect on the POS and also the LCCP would be obvious and apparent and would be at odds with the nature of the area to such an extent that it cannot be said that the POS itself would meet the test of being no less advantageous. To conclude that it would be is to limit that test to a simple test of whether the POS could physically be used, which it could physically be, without taking into account the nature and extent of the use, the significance placed upon it and the enjoyment made of it. If the proposals were to proceed then the LCC view would be that enhanced mitigation within the LCCP to ensure that</i></p>	<p>(a) The County Council acknowledge that the applicant has listed some of the concerns raised by the County Council at the hearings within the documents at paragraph 1.30, however the County Council consider that the applicant has not fully appreciated and considered the effects of the scheme on the Lincolnshire Coastal Country Park (LCCP). In particular the County Council feels that the LCCP has been treated as a matter of little significance as references have been made within the document to the fact that it is a “council promoted project with no national or local statutory designations” (paragraph 1.50). This is incorrect it is a long term landscape</p>

there is no net loss of biodiversity or public enjoyment in the LCCP would be essential."

Lincolnshire County Council

a) Provide comments on material relevant to the issue of open space land provided by the Applicant for Deadline 5.

b) Paragraph 29 of your *Response of the Lincolnshire County Council to Matters Raised at The Second Round of Hearings, Submitted For Deadline 5* [REP5-005] states:

"Although there is no public access through the TJB area the site will be visible from two footpath routes and public open space."

Provide authority for your proposition that open space is less advantageous if views out from it are affected?

c) Specify what enhanced mitigation you would require to ensure, in your view, no net loss

scale initiative that is being developed by a partnership of eight organisations, East Lindsey District Council, Environment Agency, Lincolnshire County Council, Lincolnshire Wildlife Trust, Lindsey Marsh Drainage Board, National Farmers Union, Natural England and National Trust, working together to deliver a shared vision.

At paragraph 1.37 the Applicant has listed the aims of the LCCP, in that it does not consider that the proposed development will affect the LCCP's aim to support and encourage a healthy local economy based upon a year round sustainable tourism destination. The County Council are of the view that the LCCP is a pristine area of undeveloped coast that is valued by residents and visitors for its peaceful tranquil environment. The partnership is developing and promoting the area as a green tourism destination.

The LCCP Socio- Economic Baseline Report 2020 projects an increase in visitor numbers (60,000 pa by 2020 and generating £2.2 m). The County Council are concerned that this development will damage the image of the area; deterring visitors which will lead to a reduction in visitor spend which will have a detrimental effect on the local economy that already suffers from deprivation.

At paragraph 1.40 the applicant acknowledged "that users of the LCCP are expected to experience notable change to the character and quality of their view during construction and that users will experience a moderate adverse level of effect considered to be significant and that through mitigation there are no predicted residual significant effects". Construction works will be taking place within the LCCP for a long period of time. This will have a residual significant effect on the area. It is seen as a pristine coast line attracting visitors throughout the seasons to enjoy the landscape and unspoilt natural environment. It will be

perceived as a scarred landscape for many years. The applicant has not fully acknowledged or addressed the following concerns that were made;-

(a) The possibility of existing grant funding being reclaimed as a result of not achieving predicted outcomes in relation to an increase on visitor numbers and the creation of new/ indirect employment opportunities as a result of the construction works.

(b) The ability to continue to attract future partners, the county Council, National and EU grant sources to deliver the LCCP vision, if the area is perceived to have a degraded landscape rather than existing pristine unspoilt image. Without external funding the partnership cannot justify funding future LCCP development schemes.

Within the document further references are made to supplemental documentation submitted as part of the application, reliance is placed by the applicant upon these documents that they have considered and can justify the development within the LCCP. Upon further examination it appears that a fleeting consideration has been given to the LCCP and an in depth consideration of the effects has not taken place.

(b) In summary the County Council believes that the construction process itself, which will have a strong negative effect on the area as well as the construction of the jointing boxes. The County Council believes that the construction of the jointing boxes (TJB) in the field north of Huttoft Public Footpath No. 10 and to the west of the area of public open space known as Mogg's Eye will provide a continuing visual impact on a previous unspoilt area of coastal hinterland within the Lincolnshire Coastal Country Park. The TJB will serve as an urbanisation of an area regarded as having a natural aesthetic. The County Council relies on the view

expressed previously in respect of that.

In addition the test to be applied, namely that it must be found that the position is no less advantageous, requires the application of legal principles; the ExA's question requests "authority " which could be taken to mean previous case law. If that is the case the County Council would refer the ExA to *Greenwich LBC v Secretary of State for the Environment [1993]* where the Court was asked to examine a very similar principle; although that case was directed to the application of "the equally advantageous " test rather than something being "less advantageous" under section 19 of the Acquisition of Land Act. In essence the approach is one of fact and degree for the decision maker to reach a judgment about taking into account all relevant and material factors. Mr Justice Hutchinson in that case indicated when seeking to determine whether exchange land was equally advantageous, that the decision maker was not required to just look at the way the public enjoyed all aspects of the original land to see whether the exchange land was equally advantageous to them. He was entitled to a degree of flexibility in deciding whether advantages of one sort could be offset against advantages of a different sort and in so doing he was permitted to take into account future developments which could affect either or both parcels of land. In respect of the POS we are concerned with during this application the following would apply. The decision maker should take into account all facts and matters relevant to making the decision. That would include the potential for any future development on either site and the visual effect and impact arising from any such development would be included within that. The flexibility referred to by the Court in the Greenwich case was such as to ensure all relevant factors are taken into account. Given that visitors come to this area to enjoy the green tourism related to the unspoilt area the views out from the POS will

		<p>clearly be a relevant and material consideration to take into account. A failure to take that into account would be legally unsound as the decision maker would then be ignoring a relevant material consideration in the decision making process</p> <p>(c) The approach to mitigation envisaged by the County Council is as explained in the various documents already presented to the ExA. In the LIR at para 3.26 reference is made to the need to provide for the funding of projects. At the first round of Hearings Miss Kate Percival made reference to the matter and that was followed up in the County Councils additional representations dated the 30th November 2015. Those representations contained an appendix where the matter was addressed which in itself referred to a letter sent as long ago as the 25th February 2015 from the County Council to Mr Hain as Triton Knoll Project Manager. The thrust of both being that if the scheme were to go ahead a minimum sum of money (identified as £2.3m) was required from the applicants for habitat creation and improvements within the LCCP. In addition the letter dated the 25th February indicated that the County Council was willing to meet with and discuss the details of the mitigation measures which the County Council felt were necessary and appropriate in the sensitive environmental location.</p>
SE	Socio Economic	
SE3.3	<p>Paragraph 20 of your Deadline 5 submission [REP5-005] says in respect of impact on tourism that “<i>The County has ... provided the relevant information in respect of tourism to enable the proper judgment (sic) about the effects of it (sic) to be made</i>”. Explain how the figures you have introduced into the examination at Deadline 5 [REP5-006] demonstrate</p>	<p>The County Council accept that in dealing with this aspect the decision maker has to rely on the exercise of a judgment in relation to the information provided, which is why the County Council described it in the way it did. In exercising that judgment it is necessary to take into account the information as to why people go to certain areas and the likely effect if the reason for so going is</p>

	<p>to the ExA the expected impact of the project on tourism.</p>	<p>altered in such a way that it is no longer seen in the same way or is otherwise less attractive. Figures provided in the Destination Management Plan date from 2012, subsequent research provided is up-to-date, i.e. data from 2014. This research has been provided to establish growth year on year for the tourism industry and highlights the importance of the coastal offer. It is the aspiration of both the LEP and the County Council that this will double by 2020. With projects like the £22m investment in Lincoln Castle (completed 2015) which has seen a trebling of its visitor figures were seen as the catalyst to achieving this growth. The Destination Management Plan also highlights that Lincolnshire is seen as a place most suited to coastal and rural holidays. There has been investment into the tourism product along Lincolnshire's coast, highlighted on page 16 of the Destination Management Plan.</p> <p>The continuous growth, the importance of tourism to the Lincolnshire economy and the investment into the tourism product has been highlighted to demonstrate potential impact of use/presence of plant, machinery, drill rigs, temporary compounds, haul road and temporary fencing during construction of the cable route, Intermediate Electrical Compound and Substation, all of which do not complement a natural, pristine coastline and unspoilt countryside which appeals to our visitors.</p> <p>The area comprising the East Coast (East Lindsey) specifically contributes over one quarter of the value of estimated economic impact to Greater Lincolnshire (£556m in 2014). In total, an estimated 4.27m visitors visited East Lindsey alone in 2014. We do not have specific information on location within East Lindsey but the East Coast is clearly the biggest draw for visitor numbers in that area. There are an estimated 60,000 bed spaces in East Lindsey including caravan sites. Any works that impact on the ability of visitors to access this area would have a significant impact on the</p>
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		<p>visitor numbers to East Lindsey, and further Greater Lincolnshire. All of this information comes from the aforementioned STEAM model.</p>
<p>SE3.4</p>	<p>In paragraph 48 of your Deadline 5 submission [REP5-005] you say that “<i>by way of summary the visitor economy of Greater Lincolnshire supports over 39,000 jobs ...</i>”</p> <p>Given that there is no commentary supplied with these figures, explain what impact you expect the proposal to have on the figure you quote, and the reasoning behind how this impact is arrived at.</p>	<p>This depends on the location, scale and time of proposed works. So there is a much greater risk to jobs if work is undertaken on a main arterial road during peak holiday time. Focussing more on the likely area of tourist impact; East Lindsey in 2014 there were 8,000 people employed in the Visitor Economy sector. This is unlikely to account for part time and casual/seasonal labour. In addition see below</p> <p>The tourist industry and hence those 39,000 jobs, consist of many businesses of enormous variety; their common denominator is that they are all impacted to a greater or lesser degree by the state of the visitor economy. Some like accommodation (hotels, B&B's, self-catering cottages and caravan sites) and tourist attractions themselves are obviously affected directly. Other businesses such as retail of all sorts and catering (pubs, restaurants, cafes, tea-rooms) are impacted on hugely by visitors but also by their local trade business as well. The example where the far reaching nature of the tourist industry became most apparent in Lincolnshire was in 2000 during the Foot and Mouth epidemic when the county's footpaths were closed and a clear message was sent out by the county not to visit until it was over. The economic impact, felt not only by the tourist businesses but those whose partial business was delivered by visitors, was huge and there were many businesses desperately struggling or who did not survive. It was clear that many of those businesses, who were partially reliant on the visitor economy, were unaware of the extent to which they were dependent on trade from tourists. The impacts were so severe that we were awarded EU funding in 2001 for a project called Tastes of Lincolnshire to support not only those tourist businesses but retail, catering and food producers.</p>

SE3.5	<p>Section 11 of the <i>Greater Lincolnshire Destination Management Plan 2013-2020</i> [REP5-005] quotes impacts of £1.115bn and 17,796 jobs in 2012 and says with reference to the STEAM model used to produce the figures that “<i>alternatives are available and different methodologies will give different results.</i>”</p> <p>Bearing in mind the figure quoted in SE 3.4, above:</p> <p>a) Which figure is correct? and</p> <p>b) Have any sensitivity tests been done, or any other models been used either to calibrate or to validate the figures, so as to give confidence that they are accurate?</p>	<p>(a) The figure in the DMP of 17,796 is the STEAM estimate for <u>Tourism</u> 2012 for Lincolnshire ONLY. The figure of 39,000 is derived from BRES, ONS for all of the <u>Visitor Economy</u> in Greater Lincolnshire in 2014 using defined Standard Industrial Codes (SIC) which were aggregated for the Local Enterprise Partnership Structural Investment Plan and subsequent LEP activity. The definition of Visitor Economy is wider than just tourism. For instance visitor economy includes public houses, taxi services and passenger transport. Therefore both figures are correct. The use of STEAM (Scarborough Tourism Economic Activity Monitor) volume and value data has been utilised by many destinations throughout the UK, and used in Greater Lincolnshire for a number of years. The figure provided for jobs supported by tourism is from the latest Business Register and Employer Survey - BRES, ONS, 2014.</p> <p>(b) There are two tourism models used by destinations to calculate the economic impact of tourism. One is called STEAM the other the Cambridge model. What you can't do is switch from one model to another as the basic methodologies that they use are quite different and so they are not interchangeable. When the RDA's were set up, East Midlands Development Agency decided that all of the counties in the East Midlands should use the STEAM model and so for at least the last 15 years this is the tourism model used here. T-Stats are essentially a refinement of the basic Tourism models where you can add in such items as car parking statistics, public transport, retail figures to provide further qualitative information to improve your visitor offer.</p>