



The Planning Act 2008

Application by National Grid Electricity Transmission for the Sea Link Project

East Suffolk Council's response to The Examining Authority's written questions and requests for information (ExQ1)

Issued: 17th December 2025

Deadline 3: 9th January 2026

Application: EN020026

East Suffolk Council: [REDACTED]

1. General and Cross-topic Questions (GEN)

Questions for East Suffolk Council	East Suffolk Council Response
<p>General / 1GEN1.</p> <p>All Parties</p> <p><i>Artificial Intelligence</i></p> <p><i>The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information or data? This does not include basic spell-check or grammar tools.</i></p> <p><i>If yes;</i></p> <ul style="list-style-type: none"> <i>• detail what material you have submitted which has been created using AI;</i> <i>• what systems or tools you used;</i> <i>• what the source of the information the AI based its content on was; and</i> <i>• what information or material the AI has been used to create or alter.</i> <p><i>In addition, if you have used AI, you should do the following:</i></p>	<p>ESC can confirm that it has not used Artificial Intelligence to create or alter any part of its documents, information or data.</p>

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| <ul style="list-style-type: none">• <i>clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation</i>• <i>tell us whether any images or video of people, property, objects or places have been created or altered using AI</i>• <i>tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image)</i>• <i>tell us the date that you used the AI</i>• <i>declare your responsibility for the factual accuracy of the content</i>• <i>declare your use of AI is responsible and lawful</i>• <i>declare that you have appropriate permissions to disclose and share any personal information and that its use</i> | |
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<p><i>complies with data protection and copyright legislation</i></p> <p><i>If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.</i></p>	
<p>Development Consent Order (DCO) ([CR1-027] unless otherwise stated) / 1GEN14.</p> <p>Applicant</p> <p>Local authorities</p> <p><i>Article 2 (Interpretation) “construction environmental management plan” (CEMP) and all other plans listed in Schedule 3 Requirement 6</i></p> <p><i>Explain whether it is the applicant’s intention to produce final detailed versions of plans to be certified by the Secretary of State, as described in article 2, or to produce outline plans to be certified by the Secretary of State with the final version being approved by the relevant planning authority as implied by the wording of Requirement 6 and Schedule 19?</i></p>	<p>ESC understands that final detailed versions of plans listed in Schedule 3 Requirement 6 would be approved by “the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy”, as per the wording of Requirement 6(1) of the draft Development Consent Order (‘dDCO’) [CR1-027]. Nevertheless, ESC welcomes the Examining Authority seeking clarity around the Applicant’s proposed approach, particularly regarding who the discharging authority would be for approval of the plans and for discharge of all requirements in Schedule 3. ESC agrees that, in accordance with PINS Advice Note on Drafting Development Consent Orders, it is essential that “relevant planning authority” is robustly defined, or the discharging authority (or authorities) is identified by name in each Requirement. This would remove any ambiguity and prevent confusion post-consent (should the project be granted development consent).</p> <p>ESC is currently discharging requirements of The Sizewell C (Nuclear Generating Station) Order 2022, The East Anglia ONE North Offshore Wind Farm Order 2022, and The East Anglia TWO Offshore Wind Farm Order 2022. The Sizewell C DCO Requirements identify the discharging authority and consultees by name. For East Anglia ONE North and East Anglia TWO, the term “relevant planning authority” is used within the DCO Requirements, defined as “the district planning authority for the area in which the land to which the relevant provision of this Order applies is situated”. The East Anglia ONE North and East Anglia TWO DCO Requirements also refer to “relevant highway authority”, “relevant lead local flood authority”, and “relevant local highway authority”. ESC considers that both approaches are working well. ESC appreciates that the Sea Link DCO is complicated by the project’s Order Limits spanning multiple host authorities, with potentially county</p>

<p><i>Explain who would be the relevant planning authorities for the approval of such documents and also for the discharge of Schedule 3 requirements in all locations and how this would work in practice with multiple host local authorities.</i></p> <p><i>Please note, PINS Advice Note on Drafting Development Consent Orders states that “For clarity, such requirements should generally be drafted to identify the relevant planning authority by name. This could be made clear in the definitions, for example when defining ‘the relevant planning authority’.”</i></p> <p><i>As there is an onshore CEMP and an offshore CEMP, article 2 should be updated to list both.</i></p>	<p>and district authorities having different remits in Suffolk and Kent. Therefore, whilst it may make the wording of requirements less concise, ESC considers that naming the discharging authorities for the Suffolk and Kent schemes in each requirement would be the optimal way to avoid ambiguity or confusion, noting concerns raised by SCC in Paragraph 15.34 of its LIR [REP1-130] that imprecise drafting of the Bramford to Twinstead DCO has already caused confusion post-consent.</p> <p>The Sea Link dDCO [CR1-027] defines “relevant planning authority” as “the local planning authority for the area to which the provision relates”. For Suffolk, this would be ESC. For the Suffolk Onshore Scheme, ESC is therefore the discharging authority for all of the requirements listed in Schedule 3 of the dDCO, excluding:</p> <ul style="list-style-type: none"> • Requirement 5, for which the discharging authority is the “relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy”; • Requirement 6, for which the discharging authority is the “relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy”; • Requirement 7(3), for which the “relevant highway authority” (SCC for Suffolk) is the discharging authority; and • Requirement 12, for which the “relevant highway authority” (SCC for Suffolk) is the discharging authority (although ESC notes that 12(1) appears to mistakenly refer to “the local highway authority”, which is not defined in the dDCO). <p>ESC considers that Requirement 5 and Requirement 6 are too ambiguous and vague, leaving who the appropriate discharging authority is for matters relating to any given plan, scheme or strategy open for debate. This could lead to confusion and subsequently delays post-consent. ESC therefore considers that the discharging authority should be identified by name for each of the plans listed in Requirement 5(2) and Requirement 6(1). For the Suffolk Onshore Scheme, ESC considers that it would be the appropriate discharging authority for all of the plans listed in Requirement 6(1), excluding those only concerning the Kent Onshore</p>
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	<p>Scheme, as well as the Construction Traffic Management and Travel Plan – Suffolk, the Public Rights of Way (PRoW) Management Plan – Suffolk, Material and Waste Management Plan, Construction Drainage Management Plan, Flood Management Plan (FMP), and the Operational Drainage Management Plan.</p> <p>ESC queries how the Onshore CEMP, Material and Waste Management Plan, Construction Drainage Management Plan, Flood Management Plan (FMP), and the Operational Drainage Management Plan would be approved, given that these are relevant to both the Kent and Suffolk local authorities.</p> <p>ESC is identified as the discharging authority for Requirement 14 (Archaeology). ESC considers that for Suffolk, SCC should be the discharging authority as archaeology falls within SCC's remit. This is the situation for Sizewell C, East Anglia ONE North, and East Anglia TWO DCOs. This is supported by SCC in Paragraph 15.65 of its LIR [REP1-130].</p> <p>ESC also wishes to note that Requirement 10(2) identifies the “relevant local planning authority” as the discharging authority. ESC considers that this is an error as this term is not defined in the dDCO, and this should instead read “relevant planning authority”.</p>
<p>Development Consent Order (DCO) ([CR1-027] unless otherwise stated) / 1GEN26.</p> <p>Applicant</p> <p>Local authorities</p>	<p>ESC can confirm that the Community Infrastructure Levy (CIL) is chargeable within the East Suffolk District.¹</p>

¹ <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/>

<p><i>Article 9 Community Infrastructure Levy (CIL)</i></p> <p><i>Confirm whether CIL is chargeable within the relevant local authorities and therefore whether article 9 is necessary.</i></p>	
<p>Development Consent Order (DCO) ([CR1-027] unless otherwise stated) / 1GEN28.</p> <p>Applicant</p> <p>Local authorities</p> <p><i>Article 11(2), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1)</i></p> <p><i>Explain the reasons for the inclusion of the words “which consent shall not be unreasonably withheld or delayed” and define what is meant by this wording, particularly when article 11(3), article 15(9), article 17(2), article 20(9), article 22(8) and article 50(9) include a 35-day decision period.</i></p> <p><i>Provide justification for deemed consent in the absence of a decision.</i></p>	<p>ESC strongly objects to the provision in Article 54(1)(2) of the draft DCO [CR1-027] for the Applicant to have deemed consent where the relevant authority does not determine an application within the period set out in Article 54(1)(1). This is not in keeping with other consented NSIP projects within the East Suffolk district, nor does it build a positive relationship in the spirit of collaborative working between the host authority and a consented project promoter.</p> <p>As discussed in response to Question 1GEN14, ESC is currently discharging requirements of The Sizewell C (Nuclear Generating Station) Order 2022, The East Anglia ONE North Offshore Wind Farm Order 2022, and The East Anglia TWO Offshore Wind Farm Order 2022. These DCOs do not include deemed consent and instead extend the provision of an appeal process to instances of applications not being determined within the specified time period. It is also worth noting that the original draft DCOs submitted into the Sizewell C and East Anglia ONE North and East Anglia TWO examinations did not include deemed consent; the provision of an appeals process in the event of applications not being determined within the prescribed time periods has always been the standard approach taken by applicants of projects in East Suffolk, demonstrating that Sea Link's proposed approach is very much an outlier.</p> <p>ESC considers Article 54(1)(2) to be unreasonable. An appeal mechanism is more appropriate. Whilst ESC will always endeavour to determine applications within the time periods specified in the DCO, a blanket 35-day period fails to account for</p>

<p><i>Local authorities to also provide comment.</i></p>	<p>wider context, including the number of other DCOs for which ESC and other local authorities, including Suffolk County Council (SCC), are discharging requirements. DCO Requirements are a key mechanism for controlling the development, ensuring that the appropriate mitigation is secured and implemented. DCOs are generally consented without detailed design. It is the discharge of requirements that consent the detailed design and determine how nationally significant infrastructure is experienced on the ground. Their importance cannot be overstated. It is therefore essential that the discharge of requirement process provides discharging authorities with sufficient freedom to undergo a robust determination process, rather than being pressurised into delivering sub-par results within severely constrained timescales, irrespective of current workloads. For context:</p> <ul style="list-style-type: none"> • Article 85 of The Sizewell C (Nuclear Generating Station) Order 2022 prescribes a decision period of: <ul style="list-style-type: none"> ○ 8 weeks (i.e. 56 days) where the discharging authority must consult with any other body (excluding ESC/SCC); or ○ 6 weeks (i.e. 42 days) where the discharging authority has no duty to consult with any other body. • Article 38 of The East Anglia ONE North Offshore Wind Farm Order 2022 and The East Anglia TWO Offshore Wind Farm Order 2022 prescribe a decision period of: <ul style="list-style-type: none"> ○ 56 days where no further information is requested; or ○ 42 days where further information has been supplied by the undertaker.
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	<p>ESC therefore considers the Applicant's proposed 35-day decision period to be unacceptably short, and a longer period of 56 days is requested to allow ESC to robustly assess requirement discharge applications.</p> <p>Additionally, as the DCO is currently drafted, there is nothing to prevent the Applicant from bombarding an authority with multiple applications at the same time, rendering them unable to assess them with any rigour, resulting in the Applicant receiving deemed consent with no control over the mitigation measures to be implemented to protect the local community. ESC considers that such a scenario would be entirely unreasonable and unacceptable, given the importance of proper consideration of the detailed design, and the DCO should provide adequate protections against such a situation arising. The post-consent phase is most successful where there is a positive, productive working relationship between the Applicant and local authorities; deemed consent could seriously inhibit establishment of this collaborative approach. Furthermore, ESC wishes to note that, in its experience, a degree of flexibility in the discharge of requirement process can prove beneficial to the Applicant. In some cases, ESC has expediated the discharge of requirement process for some applications in response to requests from applicants, for example to prevent complications for construction that could extend disruption for the local community. Whilst this has at times resulted in other applications being deprioritised and subsequently going over time, this has been agreed through a flexible and collaborative approach between ESC and the applicant. If the Sea Link DCO were to apply deemed consent in the absence of a decision within the specified time periods, this would likely restrict the discharging authority's ability to apply a pragmatic, flexible approach.</p> <p>In summary, ESC therefore requests that Article 54(1)(2) of the draft DCO is removed, and Article 54(4)(1) to is amended to extend the appeals process to instances where the relevant authority does not determine an application within</p>
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	<p>the time periods set out in Article 54(1)(1). The Secretary of State has granted multiple DCOs in the Suffolk area. In none of these has the Secretary of State saw fit to impose deemed consenting provisions on the relevant planning authorities. There are good reasons to follow that precedent and not break new ground as the Applicant now seeks which could mean a lack of proper scrutiny of the detailed design of this scheme where such scrutiny is vital given the size of the scheme and its interaction with a number of other nationally significant infrastructure projects.</p>
<p>Development Consent Order (DCO) ([CR1-027] unless otherwise stated) / 1GEN29.</p> <p>Applicant</p> <p>Local authorities</p> <p><i>Article 11, article 14, article 15 and article 17 consistency of wording</i></p> <p><i>Article 11(3) states “beginning with the date on which the application was received” and article 14(5), article 15(9) and article 17(2) state “beginning with the date on which the application was made”. Explain the inconsistency in wording and provide reasoning for why the 35 days should begin with the date on which the application was received or made.</i></p>	<p>ESC considers that the wording of Article 11(3), Article 14(5), Article 15(9), and Article 17(2) should be made consistent. ESC also wishes to reiterate its objections to the proposed blanket 35-day discharge of requirement decision period, as discussed in its response to 1GEN28 above. This decision period is inconsistent with those currently being implemented by Sizewell C and SPR’s East Anglia ONE North and East Anglia TWO projects, and would place unreasonable demands on discharging authorities.</p>

<p><i>Local authorities to also provide comment.</i></p> <p><i>Update the explanatory memorandum and other core documents accordingly.</i></p>	
<p>Development Consent Order (DCO) ([CR1-027] unless otherwise stated) / 1GEN47.</p> <p>Applicant</p> <p>Local authorities</p> <p><i>Requirement 3 converter station design</i></p> <p><i>The ExA notes that the requirement does not allow the relevant planning authority to approve the design of the converter station, but restricts it to confirming that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles. The ExA notes that this allows considerably greater flexibility than similar DCO requirements such as the ones for the Scottish Power Renewables consents for substations at Friston and in effect stops short of giving the relevant planning authorities the ability to control and approve the layout, scale and design. Explain why this approach provides sufficient control and why a similar approach</i></p>	<p>ESC welcomes the Examining Authority highlighting the additional flexibility sought by the Applicant through Requirement 3 of the DCO with respect to converter station design. ESC considers that the relevant planning authority (ESC for the Saxmundham Converter Station) must be awarded the flexibility to approve the layout, scale and design of the converter station, rather than merely confirming that the submitted design is in accordance with the Key Design Principles set out in the Converter Station Design Principles.</p> <p>ESC would also request that the Applicant adds a requirement to the Sea Link DCO that secures the relevant planning authority approving the layout, scale and design of the River Fromus Bridge, and the Friston substation (and the two new pylons adjacent to the substation) in the event that a Scenario 2 connection is pursued.</p> <p>ESC has been extensively engaged with the Applicant and other stakeholders around possible design options for the Proposed Development, particularly the River Fromus Bridge. The Saxmundham converter station, Friston substation and associated pylons, and River Fromus Bridge are likely to have significant landscape and visual, and cultural heritage effects.</p> <p>It is therefore essential that the DCO requirements provide robust controls over the designs of this infrastructure, in order to minimise and mitigate these effects as far as possible.</p> <p>Whilst ESC supports the Applicant establishing Design Principles with which the design of infrastructure must accord, confirmation of this accordance alone is not</p>

<p><i>to that set out in requirement 12 of the made East Anglia ONE North DCO is not required.</i></p> <p><i>The ExA notes that requirement 3 does not stipulate that the development must be carried out in accordance with the details submitted to the relevant planning authority. Explain whether this is an oversight or whether additional wording is required.</i></p> <p><i>The ExA notes that there is no requirement in the dDCO in relation to the submission and approval of the layout, scale or design of the substations in Kent and Suffolk, the River Fromus Bridge or the new pylons. Is this the applicant's intention or is it an oversight? If intentional provide justification for this approach, in the light of the identified likely significant effects of the infrastructure on landscape and visual receptors. If it is an oversight, additional requirements are necessary and the ExA would expect these to provide robust controls over the designs and the carrying out of the development in accordance with approved drawings.</i></p> <p><i>Provide an explanation as to why Design Principles - Suffolk [APP-366] and Design Principles - Kent [APP-367] are not included</i></p>	<p>sufficient. ESC requests that the Applicant takes the same approach as The East Anglia ONE North Offshore Wind Farm Order 2022 and The East Anglia TWO Offshore Wind Farm Order 2022 by allowing the relevant planning authority to approve design, subject to this being in accordance with the relevant design principles. This approach is also taken in requirements in The Sizewell C (Nuclear Generating Station) Order 2022 relating to the design of various components of the Sizewell C project.</p> <p>As stated in response to question 1GEN28, the discharge of requirements are the opportunity to approve detailed design and determine how the nationally significant infrastructure is experienced on the ground. Their importance cannot be overstated. This is the reason for the ordinary approach being for the approval of details, not merely accordance with approved principles, of which Requirement 12 of the East Anglia ONE North DCO is an example. There is no justification for moving away from the ordinary approach of proper scrutiny at the detailed design stage.</p> <p>ESC considers that Requirement 3, and any additional requirements relating to the design of Friston Substation (and the two new pylons adjacent to the substation) and the River Fromus Bridge must also stipulate that the development must be carried out in accordance with the details approved by the relevant planning authority.</p>
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<p><i>as documents to be certified in Schedule 19 pursuant to article 60 of the dDCO.</i></p> <p><i>Local authorities to provide comments on these matters.</i></p>	
<p>Compulsory acquisition (CA) and temporary possession (TP) ([CR1-003] and [CR1-005] unless otherwise stated) / 1GEN70.</p> <p>Local planning authorities</p> <p>Local highway authorities</p> <p><i>Alternatives to CA or temporary possession (TP)</i></p> <p><i>Are any of the Councils in their roles as the local planning authority and the highway authority aware of:</i></p> <ul style="list-style-type: none"> <i>• any reasonable alternatives to the CA or the TP which is sought by the applicant?</i> <i>• any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed?</i> 	<p>ESC is currently not aware of ‘any reasonable alternatives to the CA or the TP which is sought by the applicant’. However, ESC has registered to speak at CAH1 on 27th January 2026 and its engagement with NGET in respect of the CA powers sought in respect of ESC’s land interests/rights identified is presently ongoing. Further updates can be provided following CAH1.</p> <p>ESC has reviewed the ‘areas of land or rights that the applicant is seeking the powers to acquire’ across the Suffolk onshore order limits and as illustrated within [CR1-003]. Notwithstanding ESC's views on Sea Link's Need Case, as set out in Section 4 of its LIR [REP1-128], if the decision maker deems the project's Need Case to be robust, ESC does not wish to pursue any overall objection to the Compulsory Acquisition and Temporary Possession of land sought by the Applicant in order to deliver the project if consented.</p>

2. Landscape and visual

Questions for East Suffolk Council	East Suffolk Council Response
<p>1LVIA1.</p> <p>Applicant</p> <p>Local authorities</p> <p><i>Landscape vision</i></p> <p><i>Local authorities: In view of the major adverse likely significant effects, do you consider that there is a clear vision for the landscape for the whole project? If not, make suggestions for how the landscape vision should be developed.</i></p> <p><i>Applicant: Provide an explanation of how the recommendations of the Design Review Panel have influenced the landscape vision?</i></p>	<p>ESC is currently engaging with SCC and the Kent local authorities (Kent County Council, Thanet District Council, and Dover District Council) in order to ensure that local authorities' proposed approaches are coordinated and aligned.</p> <p>ESC is disappointed that there has never been a clear, overarching landscape vision or strategy for the Suffolk Onshore Scheme beyond meeting the requirements of the mitigation hierarchy and implementing a view-by-view screening planting programme. During pre-application, Suffolk's local authorities attempted to recommend an approach based on restoring the historic landscape pattern, including woodland and field boundary restoration, but that was rejected by the Applicant. There was no higher ambition to leave a lasting landscape legacy benefit such as that which will follow Sizewell C construction. The wider EDF estate will be largely taken out of agriculture and the land restored to acid grassland and heath, which will be a major contribution to the landscape character of the National Landscape. This approach was also praised by the Design Council. ESC understands that National Grid Ventures' ('NGV's') is proposing an appropriate landscape vision for its LionLink project, which will be made publicly available at the beginning of its statutory consultation (13 January 2026). ESC therefore queries why Sea Link could not have achieved a more ambitious landscape strategy. For Sea Link, ESC welcomes the Applicant's proposals to remove the rotational cricket bat willow plantation and replace it with more suitable native river corridor tree and scrub planting. However, ESC is disappointed that the Applicant has failed to adopt a similar landscape character enhancement vision across the whole Suffolk Onshore Scheme.</p>

<p>1LVIA4.</p> <p>Applicant</p> <p><i>Lighting</i></p> <p><i>The ExA notes the rural and unlit context of the substations and converter stations in Suffolk and Kent and that there is very limited detail in relation to operational lighting in the application documents. Provide additional detail in terms of the height and type of any lighting installations and light contour plans. Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity. This should include the cumulative effects with other significant light sources, such as Thanet Earth and Richborough Energy Park in Kent. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Local authorities may also like to comment.</i></p>	<p>ESC shares the ExA's wish that such lighting details be provided as described. Once received, ESC will consider the lighting information using the Suffolk Coast and Heaths Landscape Lighting Design Guide as a basis for establishing acceptable artificial lighting in a rural area.</p> <p>ESC note that the lighting design parameters are not expressly to be approved. There is, for example, no outline lighting management plan to be certified nor detailed plan to be approved under Requirement 6 that includes details of the operational lighting. This is clearly necessary.</p> <p>Further, whilst the design parameters for the operational lighting should be secured by the DCO, the final detail should be approved by the relevant planning authority by means of approving a Lighting Management Plan through a discharge of Requirement 6. This would ensure that the operational lighting is able to respond to any site-specific technical requirements and reflect the most up-to-date best practice.</p> <p>ESC considers, therefore, that details of operational lighting schemes should be approved through a discharge of requirement, but no such requirement is currently proposed. Such requirements are commonplace. For example, Requirement 25 ('Control of artificial light emissions during operational phase') of The East Anglia ONE North Offshore Wind Farm Order 2022 and The East Anglia TWO Offshore Wind Farm Order 2022 allows the relevant planning authority to approve details of artificial light emissions, including measures to minimise lighting pollution and the hours of lighting.</p>
<p>1LVIA7.</p>	<p>ESC has focused its response to this question on the application of the Section 85 Duty to the displacement of acid grassland at the landfall site, but acknowledges</p>

<p>Natural England, Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk District Council</p> <p><i>National Landscape (NL) duty</i></p> <p><i>Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2.</i></p> <p><i>In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.</i></p>	<p>that concerns have been raised by other parties regarding other activities that could impact the National Landscape.</p> <p>ESC considers that the proposed restoration of affected acid grassland at the landfall site and the proposed enhancement of an additional area of 6ha of acid grassland would satisfy the requirements of the National Landscapes Section 85 Duty to further the purposes of designation in landscape terms. ESC acknowledges concerns raised by SCC in Paragraphs 5.46-5.58 of its LIR [REP1-130], and supported by Suffolk & Essex Coast & Heaths National Landscape Partnership in its comments on SCC's LIR [REP2-038], that there are project activities other than the displacement of acid grassland which could impact the natural beauty of the National Landscape, potentially resulting in the need for further measures to satisfy the Section 85 duty. Whilst ESC recognises these concerns, it defers to SCC and Suffolk & Essex Coast & Heaths National Landscape Partnership on issues of the National Landscape s85 duty.</p>
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3. Ecology and biodiversity

Questions for East Suffolk Council	East Suffolk Council Response
1ECOL17.	ESC would expect all tree works to be carried out to guidance contained in BS3998:2010 Tree Work – Recommendations. ESC also expects that tree works

<p>Applicant</p> <p>Local authorities</p> <p><i>Tree pruning</i></p> <p><i>Paragraph 1.2.11 of the Arboricultural Impact Assessment [APP-294] states that clearance pruning would be required for the site access. Confirm how the deterioration of ancient and veteran trees would be avoided if substantial pruning is required? The local authorities may wish to comment on this matter.</i></p>	<p>contractors would have VETcert qualification (VETcert is an EU funded programme of training on ancient and veteran tree management overseen in the UK by the Ancient Tree Forum).</p>
<p>1ECOL14.</p> <p>Applicant</p> <p>Natural England</p> <p><i>Paragraph 1.5.7 of the Suffolk hazel dormouse survey report [APP-108] states that preconstruction surveys for dormouse should be undertaken in Zone D. Confirm whether the preconstruction clearance checks identified in paragraph 3.4.3 of the outline Landscape and Ecological Management Plan (oLEMP) [CR1-045] are intended to satisfy this requirement. It is noted that preconstruction surveys are</i></p>	<p>As set out in Paragraph 7.2.2.7 of East Suffolk Council's Local Impact Report [REP1-128], ESC does not consider that the pre-construction clearance checks identified in Paragraph 3.4.3 of the Outline Landscape and Ecological Management Plan (oLEMP) [CR1-045] (formerly Paragraph 3.4.2 of [AS-059]) are a satisfactory equivalent or alternative to the pre-construction surveys for dormouse recommended in Paragraph 1.5.7 of the Suffolk Hazel Dormouse Survey Report [APP-108]. The purpose of the pre-construction surveys recommended in the Suffolk Hazel Dormouse Survey report is to try to establish presence or likely absence of dormice in Zone D following the discovery of a potential hazel dormouse nest in that location, in order to inform mitigation measures necessary to address both potential killing/injury of animals and habitat loss/fragmentation impacts arising from vegetation removal. The purpose of pre-construction clearance checks, as set out in Paragraph 3.4.3 of the outline Landscape and Ecological Management Plan (oLEMP) [CR1-045], is only to identify whether any animals are present in the immediate location at the time of</p>

<p><i>currently limited to birds, bats, riparian mammals and badgers in paragraph 7.1.1 of the oLEMP.</i></p> <p><i>NE may wish to comment on the survey requirements.</i></p>	<p>works being undertaken to avoid killing or injury of individual animals. Pre-construction clearance checks only focus on the habitat to be impacted by construction and therefore do not provide information about dormice in the wider landscape, nor do they allow for habitat loss/fragmentation mitigations to be considered.</p>
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4. Cultural heritage

Questions for East Suffolk Council	East Suffolk Council Response
<p>1CH11.</p> <p>Applicant</p> <p>Local Planning Authorities</p> <p>Historic England</p> <p><i>Stakeholder involvement in the converter station design</i></p> <p><i>Within its deadline 1 submission, HE [REP1-199] stated it has concern that dDCO [CR1-027] Schedule 3 requirement 3 (Converter Station Design) as drafted makes no explicit provision for stakeholder engagement on the issue of the design beyond the County</i></p>	<p>Should Historic England (HE) and the Examining Authority consider it appropriate for HE to be consulted on the design details of the converter stations, ESC would have no objection to the wording of Schedule 3 Requirement 3 (Converter Station Design) being amended to make it a requirement for the relevant planning authority to consult HE on the design details of the converter stations.</p>

<p><i>Council. Given the proximity of heritage assets to the proposed large-scale converter stations, such as Richborough Roman Fort, the ExA asks the applicant to consider amending the wording so that this requirement makes it is necessary for the local planning authorities to consult also with HE on the design details of the converter stations.</i></p> <p><i>HE and LPAs – Are there any comments on the inclusion of HE for consultation as part of this requirement?</i></p>	
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9. Air quality

Questions for East Suffolk Council	East Suffolk Council Response
<p>1AQ2.</p> <p>Natural England</p> <p>East Suffolk Council</p> <p><i>Air quality modelling for construction compound at Sandlings</i></p> <p><i>Suffolk Energy Action Solutions Ltd (SEAS) [RR-5210] suggests that the air quality model is inaccurate and that quantification</i></p>	<p>When considering the submitted information on air quality impacts, ESC has concentrated on the impact on human health or nuisance. Sandlings SPA is an ecological European designation and so ESC defers consideration of air quality impacts on the SPA to Natural England.</p> <p>The accuracy of the air quality model appears to be suitable for use, and suggested mitigation measures reasonable. ESC has not specifically considered the impact of emissions from NRMM at the HDD compound on the Sandlings SPA but note that there is mention of it as a receptor within the document. NRMM emissions are often transient in nature and requiring Stage V/minimum Stage IV</p>

<p><i>of emissions from the HDD compound adjacent to Sandlings SPA and from back-up generators is required. Provide comment on the model and explain whether you consider that further quantification is necessary and if not, why not?</i></p>	<p>NRMM will help control emissions at all areas of the development, including the HDD compound.</p> <p>ESC does not require further quantification on the effects of NRMM emissions on the Sandlings SPA for ESC's purposes, but ESC notes that Natural England may consider otherwise for its purposes with regards to effects on ecological receptors.</p>
<p>1AQ3.</p> <p>East Suffolk Council</p> <p><i>Cumulative air quality effects</i></p> <p><i>ESC [RR-1420] notes specific concern with cumulative effects arising from construction traffic (including on air quality). Having reviewed the air quality assessment [APP-055] and [APP-068] and the cumulative vehicle emissions assessment [REP1-123], the council should confirm whether it has any residual concerns about specific road links/receptors in light of the limited effects identified in relation to construction traffic emissions and the relatively low background pollutant levels and if not, why not?</i></p>	<p>ESC considers that this question is aimed at SCC, as SCC raised concerns in Paragraph 31 of its Relevant Representation [RR-5209] regarding cumulative effects of construction traffic on air quality.</p> <p>ESC requests confirmation that any traffic data used in the air quality assessment is consistent with that agreed by SCC as Local Highway Authority. Where the impact of additional construction traffic may be locally significant and of concern to SCC but falls outside of the EPUK guidelines for air quality assessment, it should be identified and the impact on local air quality assessed.</p>
<p>1AQ6.</p>	<p>Stage IV NRMM is significantly lower emission than those stages pre-dating it. However, ESC recognises that Stage V is even cleaner and takes emission control</p>

<p>East Suffolk Council, Thanet District Council, Dover District Council</p> <p><i>REAC commitment AQ11</i></p> <p><i>Are the councils satisfied with the applicant's proposal to use stage 4 non-road mobile machinery (NRMM) as a minimum and stage 5 'where possible'.</i></p>	<p>further, and as such ESC considers that the aim should be for 100% Stage V NRMM compliance..</p> <p>ESC would therefore wish to see a change in emphasis to require Stage V NRMM use, with Stage IV use approved by the LPA via exemption where Stage V is not available. The Applicant should be required to keep logs identifying why Stage V NRMM was not used on site. These logs should be made available to the local planning authority on request.</p>
<p>1AQ8.</p> <p>East Suffolk Council</p> <p>Natural England</p> <p>Thanet District Council, Dover District Council</p> <p><i>Outline air quality management plan (oAQMP)</i></p> <p><i>Do the councils or NE have any comment on the proposed air quality monitoring equipment or the proposed air quality monitoring locations set out in the oAQMP [AS-129] and [APP-347]. It is noted that the applicant 'recommends' rather than 'proposes' use of zephyr monitors for dust monitoring. In Suffolk the monitoring location is noted to be south of the HDD compound</i></p>	<p>With regards to air quality monitoring equipment, ESC assumes that the purpose of recommending use of a Zephyr, rather than proposing it, is due to the changing, relatively new, market for air quality sensors. It is likely too early to commit to a specific type of monitor to be used. It is important that the Applicant commits to using continuous monitors or sensors, and these should be agreed with ESC prior to installation as part of the Air Quality Management Plan to be approved through discharge of Requirement 6.</p> <p>The proposed air quality monitoring locations have been agreed with the Applicant. The Air Quality Management Plan to be approved through discharge of Requirement 6 must include agreement on monitoring locations and allow for review when required by either party. The monitoring location at Stratford St Andrew will not be required once the new bypass is operational. As such, the ability to review all locations and to agree a new monitoring location for this site will need to be available.</p> <p>ESC defers to Natural England on the monitoring location south of the HDD compound.</p>

<i>which is likely to pick up effects on human receptors but not on the ecological designated sites to the north east (the prevailing wind direction).</i>	
1AQ9. Applicant East Suffolk Council <i>Implications of ozone pollution</i> <i>Representations such as [RR-3640] referenced the potential for tropospheric ozone to be present as a pollutant within the wider area. Comment on whether it has any implications for the assessment of air quality effects.</i>	<p>ESC is not an expert in tropospheric ozone as this is a specialised subject that is monitored and considered at a national level and not as part of the Local Air Quality Management regime. Tropospheric Ozone is produced by a complex mix of precursor pollutants, emission sources and environmental factors which makes reducing tropospheric ozone complicated and difficult.</p>

10. Noise and vibration

Questions for East Suffolk Council	East Suffolk Council Response
1NV8. Dover District Council East Suffolk Council	<p>ESC has reviewed Section 4.4 of the Outline Construction Noise and Vibration Management Plan (CNVMP) – Suffolk [AS-131] and broadly accepts and encourages the principle of using S.61 to regulate noise and vibration associated with construction of the Sea Link project. This also accords with the process currently being implemented for the comparable Scottish Power Renewables East</p>

<p>Thanet District Council</p> <p><i>S61 consents</i></p> <p><i>Confirm whether the current wording in section 4.4 of the Construction Noise and Vibration Management Plans [AS-131] and [AS-133] gives sufficient certainty that the applicant's contractor would make use of the s61 process and whether any additional check or approval is required by the local authorities, including in relation to provision NV01 of the REAC [CR1-043].</i></p>	<p>Anglia ONE North (EA1N) and East Anglia TWO (EA2) Offshore Wind Farm projects.</p> <p>However, ESC does note some potential issues in the implementation of S.61 in the Applicant's case and has provided further comments below.</p> <p>The Applicant states at Paragraph 4.4.1:</p> <p><i>“With the implementation of noise and vibration control measures, such as those identified in Table 4.1 and Table 4.2, no significant residual effects are predicted based on the outcome of the construction noise assessment conducted as part of the ES. However, as noted above, the contractor will be required to prepare a construction noise and vibration assessment based on their proposed construction methodologies.”</i></p> <p>ESC has raised the issue of insufficient detail in relation to mitigation and significant effects but wishes to use this opportunity to do so again in this context. Tables 4.1 and 4.2 provide examples of mitigation and its efficacy but these examples are very limited and do nothing to assist in promoting the principle of Best Practicable Means. ESC's expectation is that all forms of BPM will be considered and, where appropriate, will be implemented. The adopted noise thresholds are limits rather than targets and BPM should be used irrespective of these to reduce noise levels to the lowest reasonable level. Contractor noise and vibration assessments should be prepared accordingly, but the Outline CNVMP should contain sufficient detail in that regard.</p> <p>The Applicant states at Paragraph 4.4.2:</p> <p><i>“Where the results of the contractor's assessment indicates the potential for significant effects at NSR, or for working outside of core hours, a Section 61 application may be required.”</i></p>
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	<p>Firstly, this statement should be clear and state S.61 “WILL” be required, rather than “may” be required. However, review of this section has raised an interesting point for consideration. The Applicant has stated that S.61 would only be used where significant effects are predicted or where works outside core working hours are required. Section 4.6 of the Outline CNVMP covers monitoring and states that no routine monitoring will be undertaken and that the need for monitoring would be established through the S.61 process. However, if S.61 is only used for works that are predicted to have a significant effect, that is to say that exceeding the relevant BS5228 ‘ABC’ Methodology threshold, then there will be no monitoring being undertaken to ensure that works are compliant with the threshold as these are not currently covered by S.61 in the Outline CNVMP.</p> <p>The Applicant must be able to adequately monitor for compliance with the relevant ‘ABC’ threshold, and therefore routine monitoring must be undertaken or the S.61 process must be used for all works as is the case for Scottish Power Renewables’ EA1N and EA2 projects.</p> <p>The relevant section of EA2’s CNVMP is included below-</p> <p><i>‘10.2 APPLICATION UNDER SECTION 61 THE CONTROL OF POLLUTION ACT 1974</i></p> <p><i>The Control of Pollution Act 1974 (CoPA) gives the Council powers to control noise and vibration from construction sites and other works. Section 61 allows contractors to apply for Prior Consent and agree working hours, site noise levels and other measures prior to work starting.</i></p> <p><i>The EA2L and NGET Principal Contractors will seek and obtain prior consent(s) from ESC for all works as defined by Section 60 of the COPA (i.e. the erection, construction, alteration, repair or maintenance of buildings, structures or roads), under Section 61 of</i></p>
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	<p><i>the COPA. The application(s) for Section 61 consent will include details of the works, the methods by which they will be carried out and the measures to be implemented to minimise the noise and vibration resulting from the works. This is a proactive approach and regarded as representing best practice for major infrastructure projects.</i></p> <p><i>In recognition of the ESC's preference, the applications for prior consent under Section 61 of COPA will assess the noise impact from construction noise using the ABC assessment method set out in Annex 4 of BS 5228- 1:2009+A1:2014 and as included in Section 9.1.</i></p> <p><i>The contractors will use Best Practicable Means, as defined by Section 72 of COPA, and as set out in Table 10.1 to minimise construction noise as far reasonable and practical to do so.</i></p> <p><i>A template for these applications (combined with that for Out of Hours Working) is included as Appendix 2 of this document and also as an appendix to the Code of Construction Practice (EA2-ONS-CNS-REP-IBR000006). The Section 61 applications will include a detailed description of the monitoring and monitoring locations proposed for the particular works covered by the consent application. Provision for noise monitoring at appropriate times and locations and subsequent reporting will be incorporated within the Section 61 consent application(s)'</i></p> <p>ESC is not currently satisfied that the use of S.61 as proposed will provide adequate protection to Noise Sensitive Receptors. The Applicant must commit to either routine monitoring for compliance with the relevant 'ABC' threshold, or</p>
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	<p>commit to using the S.61 process for all works, as is the case for ScottishPower Renewables' EA1N and EA2 projects.</p> <p>The S.61 process also provides an opportunity for the Applicant to demonstrate Best Practicable Means at regular intervals during development.</p> <p>ESC has a strong preference that S.61 is used for all works. This is an established process and the industry standard that is well understood by the Applicant, by the contractors, and by ESC to control noise and vibration from construction work.</p>
<p>1NV9.</p> <p>East Suffolk Council</p> <p>Thanet District Council</p> <p>Dover District Council</p> <p><i>Construction noise and vibration management plan (CNVMP)</i></p> <p><i>Paragraph 1.3.8 of [AS-131] and [AS-133] states that "If rapid action is required to solve a noise or vibration problem and that action may contravene something written in the CNVMP, typically it is preferable to undertake the mitigating action at the earliest opportunity. The CNVMP can then be revised in reasonable time after the event." Are the local authorities satisfied with this approach or is there a need for strict application of control measures?</i></p>	<p>ESC assumes that this would result in beneficial outcomes for Noise Sensitive Receptors and would not wish to discourage rapid action to resolve an issue with noise or vibration. However, it is not clear how this could contravene something in the CNVMP. It would be beneficial if the Applicant could provide further clarity in this regard, along with an indication of the type of scenario this is intended to cover and what that scenario may contravene in the CNVMP. In respect to the CNVMP requiring amendment, ESC would encourage the adoption of a set timescale rather than an open ended "reasonable time after the event".</p>

<p>1NV11.</p> <p>Dover District Council</p> <p>East Suffolk Council</p> <p>Thanet District Council</p> <p><i>Change of noise indices</i></p> <p><i>The ExA's s89(3) letter dated 5 September 2025 [PD-008] queried the applicant's use of LAeq10hour in the applicant's construction noise assessment. The applicant reverted the assessment metrics from LAeq10hour to LAeqT, providing updated noise and vibration chapters [AS-109] and [AS-111]. Do the local authorities have any comments on the applicant's amended assessment?</i></p>	<p>ESC would like to understand if the change in metric has resulted in a change of outcome for the assessment. ESC has no preference other than that the most protective metric be adopted if it is the case that one proves to be so.</p>
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11. Socio-economics, recreation and tourism

Questions for East Suffolk Council	East Suffolk Council Response
<p>1SERT2.</p> <p>Applicant</p> <p>All County and District Councils</p>	<p>Introduction</p> <p>Tourism is an important economic sector for East Suffolk, and ESC maintains that Sea Link, whether individually or in combination with other NSIP developments, could adversely affect the sector.</p>

<p><i>Construction worker spending</i></p> <p><i>What would be the difference between the spending locally of construction workers, staying locally in accommodation like hotels for example, compared to tourists staying the same areas?</i></p>	<p>Use of visitor accommodation by non-home-based (NHB) workers during the construction period is particularly concerning, disrupting the visitor economy in several ways:</p> <ol style="list-style-type: none"> 1. Discouragement. The wider environmental impacts of Sea Link could discourage tourists planning to visit East Suffolk, whether through negative visitor perceptions caused by construction activities, or through the reduced availability of high quality, affordable visitor accommodation. 2. Needs, Behaviours, and Spending. Staying visitors (tourists) and NHB workers have differing needs and motivations for visiting East Suffolk. These affect their behaviours, what they do, and how they spend their money. Put simply, tourists are in East Suffolk to spend money, and NHB workers are in East Suffolk to earn money. <p>To determine the difference in spending locally between NHB workers and staying visitors, the body of this response summarises the well documented needs, motivations, and spending habits of staying visitors to East Suffolk. It then goes on to consider and compare the economic contribution and impact of NHB workers.</p> <p>However, the lack of published data specifically examining the economic impact of NHB workers on local visitor economies necessitates the need to reference known data, to make logical, and sensible, assumptions about NHB worker behaviour, and from these, infer valid conclusions.</p> <p>Visitor Economy: Staying Visitors</p> <p>The <i>Economic Impact of Tourism Research Report for East Suffolk</i> (see Appendix A) shows that in 2024, the total contribution of tourism (day trips and staying trips) to the East Suffolk economy was £729 million. Of which, £553 million is spent directly by tourists during their trip to East Suffolk.</p>
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	<p>Overnight trips (also sometimes referred to as ‘staying trips’) contribute £146.5 million in value to the local economy and is derived from 0.7 million overnight trips and a total of 2.8 million nights in accommodation. 68% of overnight stays were in paid accommodation.</p> <p>This equates to an average spend per overnight trip of £218 per trip (per person) and an average spend per night (per person) of £53 in 2024.</p> <p>Staying visitor expenditure can be broken down as travel (17%), attractions (9%), food & drink (28%), shopping (13%), and accommodation (33%).</p> <p>Importantly, only 33% of a staying visitors spend is on accommodation (£49m); the remaining 67% is considered discretionary spend which is injected directly into the local economy on food and drink (£40m), shopping (£19m), attractions (£14m), and travel (£25m).</p> <p>In addition, the report identifies indirect and induced value of £177m. This is the "hidden" economy of local suppliers (laundry, food wholesalers, maintenance).</p> <p>Tourists tend to spend their money locally, eating out, taking taxis, and visiting diverse sites, spreading money across dozens of local supply chains.</p> <p>Note: the Cambridge Model used to prepare this data assumes that only 40% of travel expenditure accrues to the destination; 60% occurs at trip origin. So, while the 17% travel category is part of staying expenditure, the locally retained portion is smaller.</p> <p>Non-Home-Based (NHB) Construction Workers</p> <p>There is less published data regarding the behaviours, spending patterns, and economic impact of NHB workers on the visitor economy. However, it is possible</p>
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	<p>to infer the potential impact from available sources and draw meaningful conclusions.</p> <p>The SZC Economic Impact Assessment² recognises that NHB workers will have a positive impact on the local economy through expenditure on food and accommodation but cautions that the benefits need to be reconciled with the potentially harmful impacts resulting from the use of tourist accommodation, the discouragement of visitors from the local area, or the displacement of workers to alternative employment.</p> <p>NHB workers will seek temporary accommodation from a diverse range of providers including private sector rented accommodation, serviced, and self-catering accommodation. A technical note³ for the SZC Gravity Model and Accommodation Strategy identifies the primary drivers affecting the choice of accommodation for NHB workers: the affordability and availability of accommodation, and the cost of the journey to the site of employment.</p> <p>To gain an insight into the affordability of accommodation for NHB workers, the Construction Industry Joint Council - Working Rule Agreement for the Construction Industry (Revised 1st August 2025) states that the 2025 subsistence allowance agreed with HMRC is £51.97 per night and that to claim fare and travel allowances, workers need to satisfy the rule that they are 'living as near to the job as there is accommodation available'.</p> <p>The availability of accommodation is difficult to determine when considered in combination with the timing of other NSIP developments in East Suffolk. The Sea</p>
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² Hardisty Jones Associates (2018) *Sizewell C Economic Impact Assessment Draft Final Report*. Available at:

<https://www.eastsuffolk.gov.uk/assets/Planning/Sizewell/Economic-Impact/SZC-Economic-Impact-Draft-Final-Report-v4.0.pdf> (Accessed: 5 January 2026).

³ Paget, G. (2020) *Technical Note – Gravity Model and Accommodation Strategy Review*. Available at: [https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-004140-East%20Suffolk%20Council%20-%20Suffolk%20County%20Council%20-%20Local%20Impact%20Reports%20\(LIR\)%20from%20any%20local%20authorities%20Aecom%20Review%20of%20the%20Gravity%20Model%20from%20an%20accommodation%20perspective%20for%20ESC.pdf](https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010012-004140-East%20Suffolk%20Council%20-%20Suffolk%20County%20Council%20-%20Local%20Impact%20Reports%20(LIR)%20from%20any%20local%20authorities%20Aecom%20Review%20of%20the%20Gravity%20Model%20from%20an%20accommodation%20perspective%20for%20ESC.pdf) (Accessed: 5 January 2026).

	<p>Link Environmental Statement [REP1A-005] suggests a peak workforce of 327 FTE to be on site for one day during 2028. However, this is expected to average out at 86 FTE over the entire construction period. 70% of these are expected to be NHB workers.</p> <p>The convergence of the Sizewell C (SZC) peak construction phase (2029/2030) and the Sea Link project timeline present a significant risk to the equilibrium of the East Suffolk visitor economy. At the SZC peak, the demand for off-site accommodation is projected to exceed 2,900 non-home-based (NHB) workers. When the additional requirement for NHB workers for the Sea Link project, despite being lower in number, is superimposed onto this peak, the cumulative demand threatens to exceed the total functional capacity of the local rental and serviced accommodation sectors.</p> <p>Emerging (though currently unpublished) evidence suggests that existing stock is already approaching a point of structural saturation. In such a constrained market, the introduction of even a marginal increase in industrial demand acts as a catalyst for visitor dispersal.</p> <p>As price-sensitive long-term contracts offer higher yields and lower turnover costs for providers, traditional leisure visitors are effectively "crowded out" through both lack of availability and significant price inflation. This displacement does not merely shift visitors to neighbouring districts; it risks the permanent loss of a loyal demographic who, unable to secure affordable or suitable accommodation within impact areas, may cease to view East Suffolk as a viable destination. This represents a profound threat to the integrity of the regional tourism offer—a sector characterised by its reliance on a high-quality, accessible accommodation brand—thereby undermining the long-term socio-economic sustainability of the East Suffolk coast.</p> <p>There is little published information regarding NHB worker spend in the local economy. However, using spend profiles for the visitor economy and considering</p>
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	<p>the likely needs and motivations of a typical NHB worker, it is possible to make logical assumptions about their economic contribution locally.</p> <p>Drawing on the known Construction Industry Joint Council subsistence allowance of £51.97 per night, and assuming that an NHB worker will also need to spend 33% of their budget on accommodation, this leaves a similar 67% available as discretionary spend.</p> <p>However, the difference in local spend between a staying visitor and an NHB worker is that the NHB worker is likely to spend their money differently. Leakage out of the local economy will be high as NHB workers sends a significant proportion of their 'discretionary' spend home to their families. They are likely to spend less on high margin goods and services, opting for groceries from national chains, and limiting their leisure activities, particularly if they are in East Suffolk for a five-day week.</p> <p>ESC also wishes to note that it is expected that the 'Retail Spend Insights 2025' Report from Beauclair will be published in March 2026. ESC considers that this is likely to provide useful insights into NSIP-induced retail spending habits locally.</p> <p>Conclusion</p> <p>Evidence from the 2024 Economic Impact of Tourism report for East Suffolk (Appendix A) demonstrates that the local economy is uniquely dependent on a diverse 'staying visitor' spend profile that temporary construction workers do not replicate. While a worker may occupy a bed, they displace a high-value visitor who contributes across five distinct local sectors: accommodation, shopping, food and drink, attractions, and travel.</p> <p>The spending profiles of tourists and NHB workers are not the same. Tourists, by definition, are visiting East Suffolk for pleasure and to spend money in support of</p>
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	<p>that aim. NHB workers are in East Suffolk for employment purposes, to earn money and to provide for themselves and their families at home.</p> <p>Staying visitors generate £146m for the East Suffolk visitor economy, representing 26% of the £553 million spent directly by tourists during their trip to East Suffolk in 2024.</p> <p>Staying visitors spend, on average, £53 per night, per person, the majority of this spend is 'injected' directly into the local economy, on accommodation, shopping, food and drink, attractions, and travel. Often in small, independent businesses offering high-margin discretionary products and services such as tours, gifts, and high-end dining.</p> <p>NHB workers, on the other hand, will seek to retain their earnings, minimising expenditure on high margin or discretionary goods and services, and utilising their £51.97 per night subsistence allowance on essentials such as accommodation, fuel, and national-chain groceries.</p> <p>In conclusion, for every hotel room or bed lost to a NHB worker, the visitor economy loses a visitor who would have spent 67% (c. £146 per person) of their holiday budget on specialist goods and services, supporting the visitor economy locally.</p>
<p>1SERT7.</p> <p>Applicant</p> <p>County and District Councils</p> <p><i>Employment and skills plan</i></p> <p><i>Applicant - It is acknowledged that the ES for Suffolk [REP1A-005] and Kent [REP1A-</i></p>	<p>ESC has considered question 1SERT7 in the context of the updated ES for Suffolk [REP1A-005], and the Applicant's response to East Suffolk Council's Local Impact Report [REP2-027].</p> <p>Referencing [REP1A-005], Table 10.1 at Paragraph 5.13.12, ESC notes that the Applicant '<i>has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level, as this is not considered to be an efficient or effective approach bearing in mind the low number</i></p>

<p>007] has concluded that there would not be any likely significant adverse effects in relation to construction employment. However, NPS EN-1 at paragraph 5.13.12 states that the:</p> <p><i>“Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.”</i></p> <p><i>Considering the wording of this paragraph of the NPS, explain why the applicant considers that a Skills and Employment Plan is not necessary, especially given the scale of the proposal.</i></p> <p><i>Councils – Provide your views on the need for an employment and skills plan, and if it could be of practical benefit over and above commitments currently made by the applicant.</i></p>	<p><i>of construction workers anticipated and that National Grid has not identified any likely significant effects in relation to this matter’.</i></p> <p>In addition, within the Applicant’s response to ESC’s LIR submission [REP2-027], Paragraphs 7.8.9.4 to 7.8.9.7, the Applicant has described their intention to work collaboratively with the Council and with its main works contractors to develop and implement a Social Value Strategy; as well as <i>‘exploring potential coordination with other projects in Suffolk, such as Sizewell C’s ‘College on the Coast’, to understand if this may be an avenue to deliver wider skills benefits in a coordinated manner’.</i></p> <p>In response, ESC is both disappointed and in disagreement with the Applicant’s assessment that a ‘project level’ Employment, Skills and Education Strategy is not appropriate; conversely, ESC cautiously welcomes the Applicant’s commitment to a Social Value Policy and intended coordination with Sizewell C to support the ‘College on the Coast’ project.</p> <p>However, in the absence of written guarantees or a tangible Employment, Skills and Education Strategy from the Applicant, ESC remains concerned that the ambitions outlined may not progress and the socioeconomic opportunities for local people will neither be maximised nor realised.</p> <p>Policy Justification for a Skills and Employment Plan</p> <p>A Skills and Employment Plan is necessary from East Suffolk Council’s perspective because, while the Sea Link project may be presented as relatively modest in direct workforce terms, national policy explicitly anticipates that the Secretary of State may secure an employment and skills plan requirement through the Development Consent Order to promote local employment, skills development, apprenticeships and engagement with local education and training providers. This</p>
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	<p>expectation is set out within NPS-EN1 and is reflected within the project's own socio-economic assessment, which acknowledges the policy basis for such a requirement even where the Applicant considers project-specific commitments to be unnecessary.</p> <p>Securing Genuine Local Benefit and Reducing Labour Market Leakage</p> <p>A Skills and Employment Plan is required to ensure that the headline economic benefits identified in the assessment translate into tangible local outcomes within a constrained labour market. The project's socio-economic assessment assumes a high degree of labour leakage, alongside displacement and multiplier effects. Without an agreed and enforceable plan, there is a clear risk that construction employment opportunities would be disproportionately taken up by non-local workers, limiting benefits to East Suffolk residents and businesses. A Skills and Employment Plan provides the mechanism to actively manage this risk through targeted local recruitment, skills brokerage, engagement with local providers, and clear entry routes into employment.</p> <p>Delivering Local Plan Objectives Through a Clear Implementation Mechanism</p> <p>The requirement for a Skills and Employment Plan is further supported by local planning policy. Policy SCLP3.4 of the Suffolk Coastal Local Plan⁴ expects major energy infrastructure projects to maximise economic and community benefits, including opportunities for local employment, education, and skills development. A Skills and Employment Plan is the practical delivery vehicle for these objectives, translating policy intent into defined actions, targets, monitoring arrangements and</p>
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⁴ East Suffolk Council (2020) *Suffolk Coastal Local Plan*. Available at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Suffolk-Coastal-Local-Plan/Adopted-Suffolk-Coastal-Local-Plan/East-Suffolk-Council-Suffolk-Coastal-Local-Plan.pdf> (Accessed: 5 January 2026).

	<p>governance structures that can be secured through the Development Consent Order and monitored throughout the construction phase.</p> <p>Managing Cumulative Workforce Impacts in a Constrained Labour Market</p> <p>The plan is also necessary to manage cumulative impacts arising from multiple nationally significant infrastructure projects being delivered within overlapping timeframes. The local and regional labour market is already under pressure, and uncoordinated demand risks exacerbating skills shortages, increasing competition for labour, and displacing workers from existing employers. A Skills and Employment Plan provides a single, coherent interface for aligning workforce demand, training provision, and local engagement across the project lifecycle, helping to smooth peaks and troughs in demand and support a more resilient regional labour market.</p> <p>Using Established Governance: The Role of the RSCF, ASEC, Employment Outreach Fund and Bursary Fund</p> <p>ESC considers that a Skills and Employment Plan can be delivered proportionately and efficiently through existing regional governance arrangements, notably the Regional Skills Coordination Function (RSCF) and the Major Infrastructure Forum, supported by targeted investment through existing skills and employment funds. By way of example, Sea Link could make a proportionate financial contribution towards the Asset Skills Enhancement Capability (ASEC) to support construction skills capacity at local colleges, including investment in specialist training equipment, short-course provision aligned to site requirements, or additional teaching capacity during peak construction periods. Complementary contributions to the Employment Outreach Fund could support engagement with underrepresented groups, local residents facing barriers to employment, and pre-employment support aligned to construction opportunities, while the Bursary Fund</p>
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	<p>could help individuals access training, qualifications or equipment required to enter or progress within the construction workforce. Delivered through the RSCF, these contributions would be coordinated alongside other major projects to avoid duplication, target genuine skills gaps, and leave a lasting skills and employment legacy for the Suffolk labour market and East Suffolk residents beyond the Sea Link construction phase. The Major Infrastructure Forum would provide the mechanism for aligning this approach with wider developer activity, ensuring cumulative workforce needs are addressed collaboratively rather than on a project-by-project basis.</p>
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13. Cumulative effects (intra-project)

Questions for East Suffolk Council	East Suffolk Council Response
<p>1CEIntra2.</p> <p>Suffolk County Council, Kent County Council, East Suffolk Council, Thanet District Council</p> <p><i>Significant intra-project cumulative impacts and mitigation (ISH1)</i></p> <p><i>Can the councils comment on the applicant's response to AP8 regarding identification of significant effects [REP1-124] and AP9 with respect to the applicant's approach to mitigation of identified</i></p>	<p>ESC has reviewed the Applicant's response to Issue Specific Hearing 1 Action Point AP8 [REP1-124], including Appendix A of this document which provides a summary of the findings of a review undertaken by the Applicant of the approaches taken by applicants of some recently made DCOs to intra-project cumulative effects assessments. ESC agrees with the Applicant that combining quantitative and qualitative effects on a receptor to come to a conclusion on intra-project cumulative effects '<i>can never...be undertaken quantitatively and can only ever be determined using professional judgement</i>'. ESC is surprised that the Applicant uses this argument, in part, to justify not differentiating between moderate and major intra-project cumulative effects. Environmental Impact Assessment relies on professional judgement for a range of disciplines. Although ESC acknowledges that the intra-project cumulative effect assessment is complicated by requiring a combination of judgements from specialists in different</p>

<p><i>cumulative intra-project significant effects</i> [REP1A-037]?</p>	<p>disciplines, ESC considers that more could have been done by the Applicant to come to a conclusion on whether the identified intra-project cumulative effects are moderate or major.</p> <p>As the Applicant acknowledges, there are examples of environmental assessments which do differentiate between moderate and major intra-project cumulative effects, which demonstrates that such form of professional judgement is entirely possible. Nevertheless, ESC acknowledges that equally there is precedent for DCO projects not differentiating between moderate and major intra-project cumulative effects, and that the EIA regulations do not require this differentiation. Therefore, ESC does not object to the Applicant's approach. ESC would, however, welcome the provision of any further quantification or clarity where possible to assist all parties in understanding the likely significant effects of the Proposed Development on the environment.</p> <p>ESC has reviewed the Applicant's response to Issue Specific Hearing 1 Action Point AP9 [REP1A-037]. ESC accepts the Applicant's assertion that "<i>there is often little more that can be done as any available opportunities to mitigate the individual significant effects have already been taken</i>", and that "<i>mitigation would therefore need to focus on reducing one or more of the minor effects</i>". The Applicant goes on to state that mitigating minor individual effects is likely to require a greater level of detail from the appointed Main Works Contractor than is currently available. ESC welcomes commitments in the Construction Environmental Management Plan Register of Environmental Actions and Commitments [CR1-043] and in the Outline Construction Traffic Management and Travel Plan [CR1-041] to provide local communities and businesses, road users, and PRow users with means to communicate with construction contractors, including via the Transport Coordinator, Environmental Manager and Environmental Clerk of Works. ESC acknowledges that these commitments could provide opportunities for any specific</p>
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	<p>significant intra-project/combined effects that do materialise to be considered on an individual basis and for enhanced mitigation measures to implemented to address them. However, ESC requests that the Applicant commits to a more proactive and less reactive approach to addressing intra-project cumulative effects. For instance, once a greater level of detail can be obtained from the Main Works Contractor, the Applicant must commit to reviewing what specific mitigation measures are practicable and could mitigate the identified intra-project cumulative effects for which “<i>no mitigation has been confirmed at this stage</i>”. This should be included as a commitment in the REAC, with detailed mitigation measures for addressing intra-project cumulative effects secured via the relevant management plans to be approved through a discharge of Requirement 6.</p>
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23. Climate change

Questions for East Suffolk Council	East Suffolk Council Response
<p>1CC1.</p> <p>Applicant, Suffolk County Council, Kent County Council, East Suffolk Council, Thanet District Council</p> <p><i>(on the application of Finch on behalf of the Weald Action Group) v Surrey County Council judgment</i></p> <p><i>Applicant - The Climate Change assessment [APP-085] states that it is not</i></p>	<p>ESC has reviewed the climate change assessment within [APP-085] and agrees with the Applicant’s conclusion set out in Section 1.3.10 which states ‘...<i>the Proposed Project would increase capacity in the electricity network, meaning that, in theory, more electricity can be transported and used, increasing the potential for additional activities requiring electricity. However, whilst information is available at a high level regarding the amount of electricity that could flow as a result of an enhanced transmission network, it is impossible to quantify the amount of either the increase, or more likely decrease, in greenhouse gases that could result from the use of that additional electricity capacity.</i>’</p>

<p><i>possible to calculate the likely upstream and downstream direct or indirect effects and any resultant increases or decreases in greenhouse gases. Can the applicant justify their position and provide specific examples of other NSIP which have taken this approach?</i></p> <p><i>Councils – Do you agree with the applicant’s position and approach? If not, why not?</i></p>	<p>Given the nature of the Sea Link project (if consented), being an onshore network reinforcement project, ESC agrees that it would be impossible to categorically quantify the amount of increase or decrease in greenhouse gases which could result from the use of the additional electricity network. The flow of electrons in either direction within the Sea Link cable could be from various generation sources or indeed the existing transmission network. ESC considers that it would be impossible for the Applicant (or any other IP) to evidence this beyond doubt and calculate a precise ‘<i>likely upstream and downstream direct or indirect effects and any resultant increases or decreases in greenhouse gases.</i>’</p>
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9th January 2026



APPENDIX A – ECONOMIC IMPACT OF TOURISM – EAST SUFFOLK 2024





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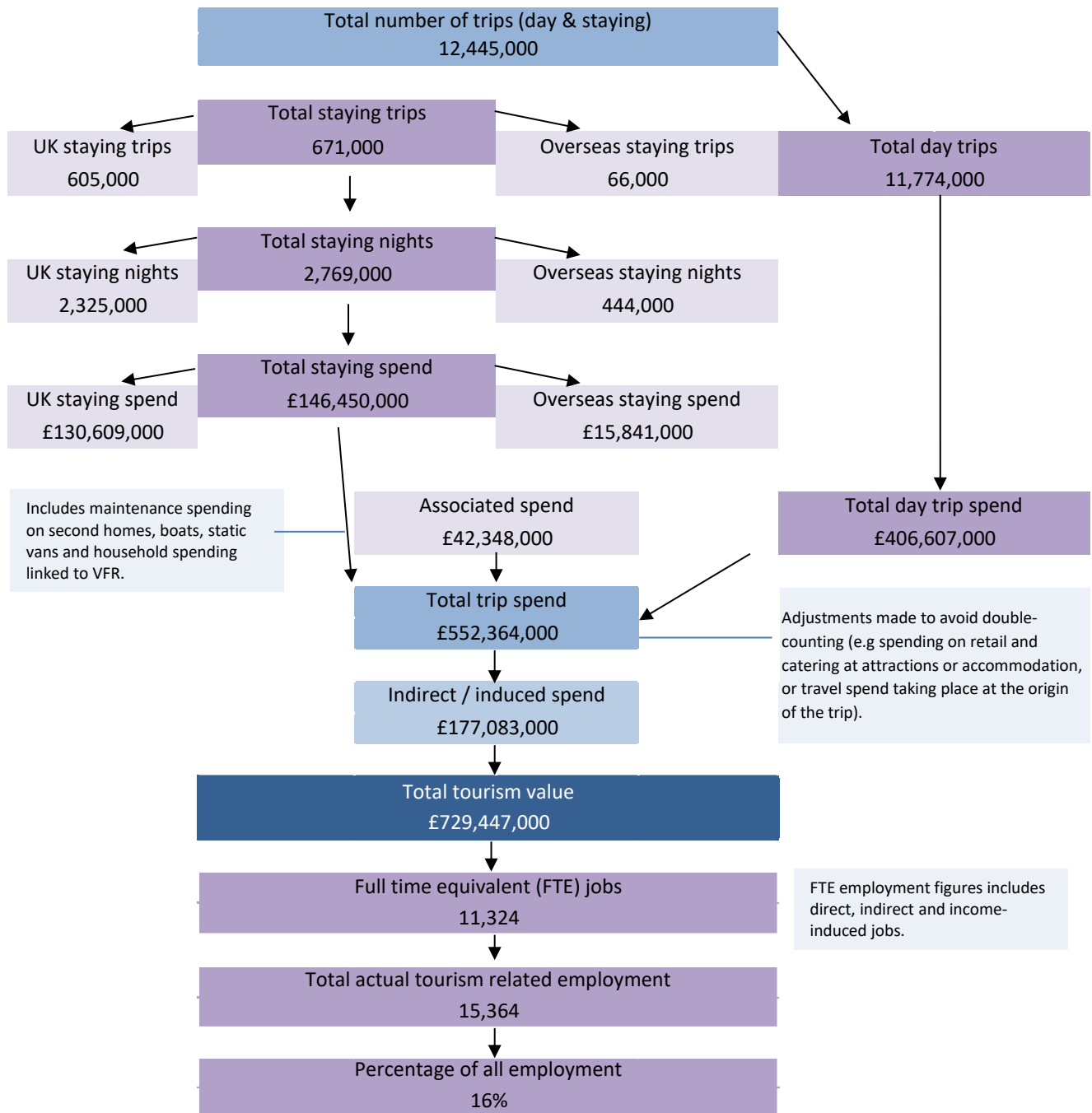
Produced by:

Destination Research
Sergi Jarques, Director

Economic Impact of Tourism
East Suffolk - 2024

Economic impact of tourism – Headline figures

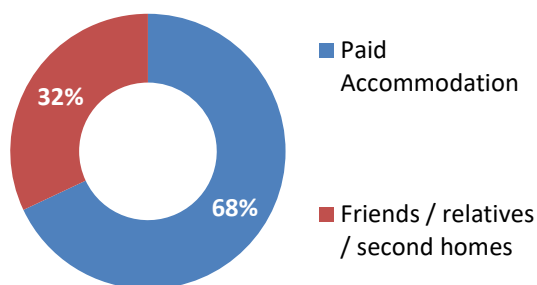
East Suffolk - 2024



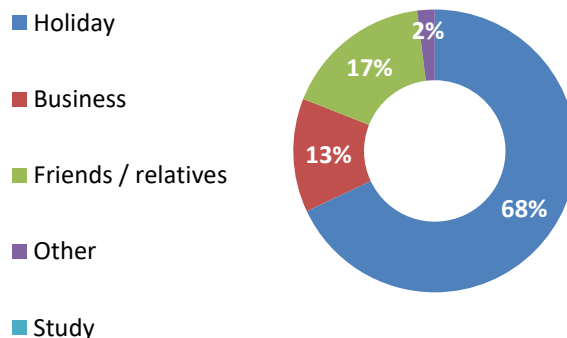
Economic impact of tourism – Year on year comparisons

<u>Day Trips</u>	2023	2024	Annual variation
Day trips volume	12,053,000	11,774,000	-2%
Day trips value	£385,826,000	£406,607,000	5%
<u>Overnight trips</u>			
Number of trips	688,000	671,000	-2%
Number of nights	2,594,000	2,769,000	7%
Trip value	£142,161,000	£146,450,000	3%
Total value	£692,793,000	£729,447,000	5%
Actual jobs	14,588	15,364	5%

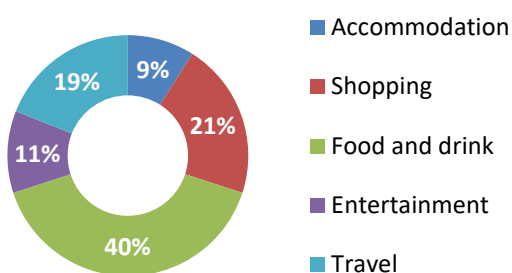
Type of accommodation



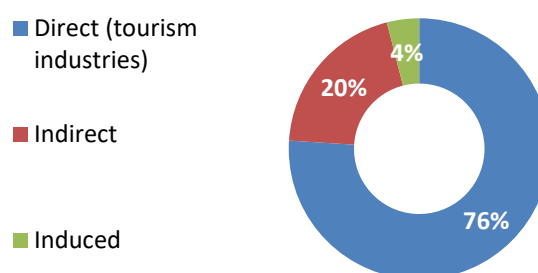
Trips by purpose



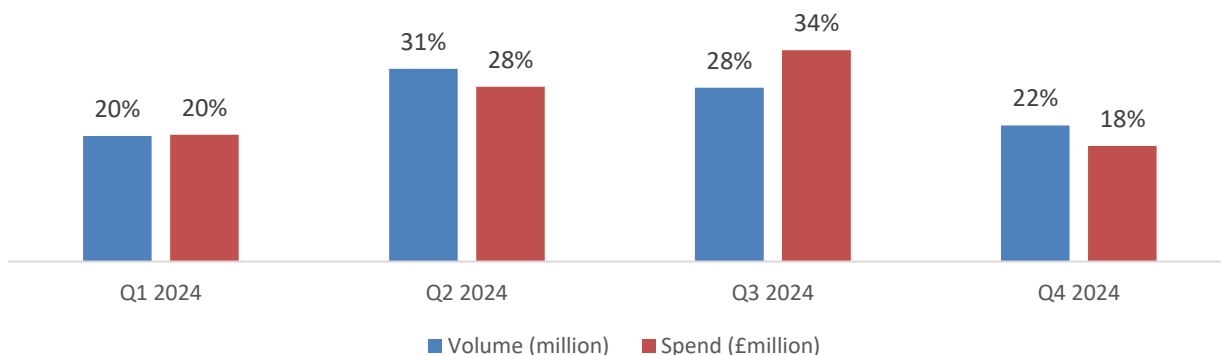
Breakdown of expenditure



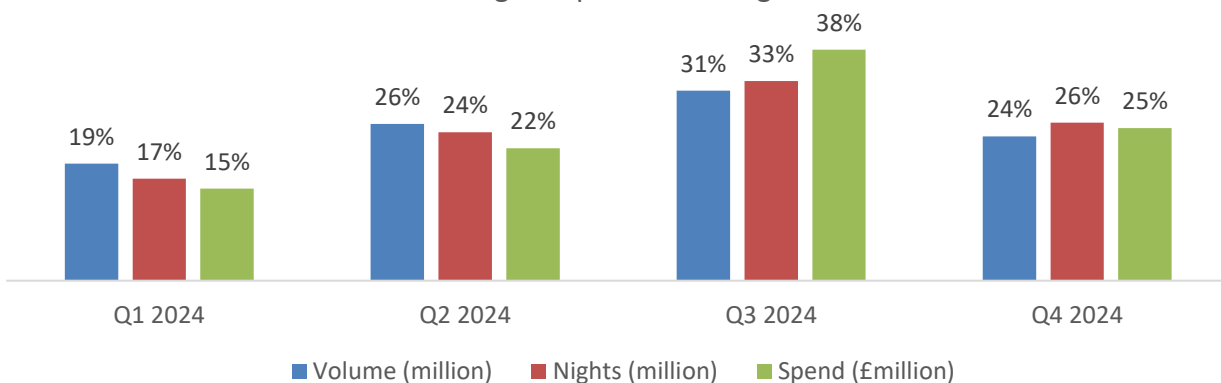
Type of employment



Tourism Day Trips - East of England



Overnight Trips - East of England



Contents	
<u>Contextual analysis</u>	5
<u>Volume of tourism</u>	8
Staying trips - Accommodation type	9
Trips by accommodation	
Nights by accommodation	
Spend by accommodation	
Staying trips - Purpose of trip	10
Trips by purpose	
Nights by purpose	
Spend by purpose	
Day trips	10
<u>Value of tourism</u>	11
Expenditure associated with trips	12
Direct expenditure associated with trips	
Other expenditure associated with tourism activity	
Direct turnover derived from trip expenditure	
Supplier and income induced turnover	
Total local business turnover supported by tourism activity	
<u>Employment</u>	14
Direct	15
Full time equivalent	
Estimated actual jobs	
Indirect & induced employment	15
Full time equivalent	
Estimated actual jobs	
Total jobs	16
Full time equivalent	
Estimated actual jobs	
Tourism jobs as a percentage of total employment	16
Appendix I - Cambridge Model methodology	18

Introduction

This report examines the volume and value of tourism and the impact of visitor expenditure on the local economy in 2024 and provides comparative data against the previously published data. The results are derived using the Cambridge Economic Impact Model under licence by Destination Research Ltd based on the latest data from national tourism surveys and regionally/locally based data.

The Cambridge Model is a tool that is constantly changing and adapting. In recent years, both domestic and international tourism surveys used in the model have seen major updates in their methods and data collection techniques, leading to notable changes in their findings. In addition, the results have been further influenced by changes in travel behaviour due to factors like COVID-19, the cost-of-living crisis and rising energy costs. It is difficult to establish whether changes in reported travel and spending are simply a reflection of new travel patterns or are they mainly a result of the updated methodologies.

For this reason, we have implemented a hybrid data approach that involves a two-stage evaluation process. The first stage uses the Cambridge Model to break down regional tourism data into sub-regional areas using a top-down approach. This is then combined with bottom-up initiatives that include data from third-party sources and business performance data collected at the destination level by us and our partners. We have also employed time series analysis on previously published data, using concepts derived from State Space Models (SSM). The projected figures generated through this analysis, as presented in the Cambridge Model reports, aim to serve as a proxy for the potential outcomes that might have occurred in the absence of methodological changes.

This evolving methodology has been pivotal in our ability to produce a dynamic and reliable picture of tourism trends throughout the pandemic year, the cost-of-living crisis, and periods of fluctuations in inflation. It also ensures that our results are as timely, accurate, consistent, and comparable as they can be. Some examples of additional data sources introduced in the last five years are:

- Attractions data - ALVA (Association of Leading Visitor Attractions)
- VisitEngland Domestic Sentiment Tracker
- Short-term rental stock and occupancy - Lighthouse / AirDNA
- Local serviced accommodation data
- Tourism business counts - Inter Departmental Business Register (IDBR)
- UK inflation data - Consumer Prices Index (CPI, CPIH), Retail Prices Index (RPI)
- UK economy forecasts - Office for Budget Responsibility: Economic and fiscal outlook
- Footfall data (town centres, large retail outlets and car parks).

Contextual analysis - Recent issues affecting tourism

Inflation

The UK's annual Consumer Price Index (CPI) inflation rate for 2023 averaged 7.3%. This follows a peak of 9.1% in 2022. The average inflation rate for 2024 was around 2.9%.

Energy prices

Global prices for gas, electricity, and oil began rising in summer 2021 as economies reopened following pandemic-related lockdowns. This underlying increase was amplified by reduced fuel supplies from some producers and growing tensions between Russia and Ukraine.

The first major impact on domestic customers in Great Britain came in April 2022, when the energy price cap rose by 54%. The Government's Energy Price Guarantee then set a maximum unit price for consumers. However, the average annual bill for typical gas and electricity use remains significantly higher than in winter 2021/22.

Cost-of-Living

While the sentiment related to the cost-of-living crisis improved throughout 2024, vs 2022, there were still 70 to 80% of consumers who either believed that worst was still to come (30% to 35%) or that things will stay the same (40% to 45%). However, sentiment shifted throughout the year, with the last three months of 2024 being the most negative.

Value of the pound

Over the past five years or so, the pound has been relatively weak, especially against the dollar, and to a lesser extent against the euro. A weaker pound means that it is generally cheaper for overseas residents to visit the UK, which makes the UK relatively more attractive. It also makes staying in the UK relatively more attractive to UK tourists compared to travelling abroad.

Staffing issues

Staff vacancies have been affected by employment costs associated with changes to minimum wage and employment National Insurance contributions.

Electronic travel authorisation (ETA) and EU visitor passport requirements.

The UK's roll out of the £10 electronic travel authorisation (ETA) began in October 2023, first for all non-visa nationals and then required for visitors from European countries too. It has been assumed that ETAs will have a very low impact for long-haul markets, as it is a very small proportion of total trip spend and a low impact for Europe, as the proportion of trip spend would be larger.

Tax-free shopping

While the UK was part of the EU, it had a tax-free shopping scheme allowing non-EU visitors to claim back VAT on goods purchased in the UK and taken home. This scheme ended in Great Britain after the Brexit transition on 31 December 2020. The end of the scheme led to higher tax revenues, even though foreign tourist spending has declined and is expected to keep falling.

Domestic and overseas trips: 2024 results

Domestic overnights visits

There were 105.6 million domestic overnight trips in Great Britain in 2024. Domestic spend on overnight trips reached 32.9 billion, and the average spend per trip in Great Britain rose from £266 in 2023, to £312 in 2024.

- Domestic overnight trips volume decreased by 10% vs 2023 and by 14% vs 2022.
- Spend on overnight trips in England in 2024 was 5% above 2023 and 3% above 2022.
- Large towns and cities continued to be the most popular destinations in England in 2024 and further increased in popularity in 2024, from 44% share in 2022, 45% in 2023 to 46% in 2024.
- The number of trips with a stay in a 'caravan / camping / glamping' reduced vs 2023 and 2022.
- In 2024, regions with the largest share of overnight trips in England were South West (17%), London (17%), North West (16%) and South East (16%).

Domestic day visits

There were 1.03 billion domestic tourism day visits in Britain in 2024. Spend on day visits in Great Britain reached £54.8bn, and the average spend per day visit in Great Britain rose from £44 in 2023, to £53 in 2024.

- The domestic tourism day visits volume decreased in 2024 by 12% vs 2023 after an 8% year-on-year increase in 2023.
- Spend on tourism day visits in England in 2024 rose by 6% in 2024 to £48.4 billion, following a 15% year-on-year increase in 2023.
- Visits to the seaside increased in 2024, especially during the first quarter of the year.
- In 2024, London was still the most popular day visit destination in England (21% of visits and 25% of spend), followed by the South East and North West.

Visits to visitor attractions

Overall, attractions in England reported an 1.4% annual increase in visits from 2023 to 2024, with a 7% increase in 2024 adult admission fees (higher than the rate of inflation) and an 8% increase in gross revenue.

Overseas visits

VisitBritain's estimate for the full year 2024 is 41.2 million inbound visits to the UK with £31.5 billion spent. This would represent growth of 9% in visits on 2023, and would be 1% up on 2019. Spend would be 1% up on 2023 (though 1% down in real terms) and 11% up in nominal terms on 2019.

- Visits to Friends or Relatives (VFR) lead the recovery, with trips and spend surpassing pre-COVID levels.
- Holiday visits have almost reached pre-COVID levels and are growing, although spend is down in real terms.
- Business visits are lagging well behind (both short and long haul) though up on 2023
- The fast recovery of VFR trips has pushed down average spend per visit.

Volume of tourism

East Suffolk - 2024

Staying visitors - Accommodation type

Trips by accommodation

	UK		Overseas		Total	
Serviced	174,000	29%	12,000	18%	186,000	28%
Self catering	37,000	6%	6,000	9%	43,000	6%
Camping	57,000	10%	3,000	5%	60,000	9%
Static caravans	74,000	12%	1,000	1%	75,000	11%
Group/campus	1,000	0%	1,000	1%	2,000	1%
Paying guest	0	0%	0	0%	0	0%
Second homes	24,000	4%	4,000	6%	28,000	4%
Boat moorings	26,000	4%	0	0%	26,000	4%
Other	55,000	9%	5,000	8%	60,000	9%
Friends & relatives	157,000	26%	34,000	52%	191,000	28%
Total 2024	605,000		66,000		671,000	
Comparison 2023	624,000		64,000		688,000	
Difference	-3%		3%		-2%	

Nights by accommodation

	UK		Overseas		Total	
Serviced	364,000	16%	81,000	18%	445,000	16%
Self catering	286,000	12%	37,000	8%	323,000	12%
Camping	306,000	13%	18,000	4%	324,000	12%
Static caravans	246,000	11%	2,000	1%	248,000	9%
Group/campus	10,000	0%	5,000	1%	15,000	1%
Paying guest	0	0%	5,000	1%	5,000	0%
Second homes	205,000	9%	32,000	7%	237,000	9%
Boat moorings	91,000	4%	0	0%	91,000	3%
Other	131,000	6%	24,000	6%	155,000	5%
Friends & relatives	686,000	29%	240,000	54%	926,000	33%
Total 2024	2,325,000		444,000		2,769,000	
Comparison 2023	2,189,000		405,000		2,594,000	
Difference	6%		10%		7%	

Spend by accommodation type

	UK		Overseas		Total	
Serviced	£44,160,000	34%	£2,987,000	19%	£47,147,000	32%
Self catering	£12,592,000	10%	£2,000,000	13%	£14,592,000	10%
Camping	£9,750,000	7%	£366,000	2%	£10,116,000	7%
Static caravans	£16,829,000	13%	£69,000	0%	£16,898,000	12%
Group/campus	£136,000	0%	£570,000	4%	£706,000	1%
Paying guest	£0	0%	£175,000	1%	£175,000	0%
Second homes	£2,572,000	2%	£953,000	6%	£3,525,000	2%
Boat moorings	£3,989,000	3%	£0	0%	£3,989,000	3%
Other	£22,432,000	17%	£209,000	1%	£22,641,000	15%
Friends & relatives	£18,149,000	14%	£8,512,000	54%	£26,661,000	18%
Total 2024	£130,609,000		£15,841,000		£146,450,000	
Comparison 2023	£126,646,000		£15,515,000		£142,161,000	
Difference	3%		2%		3%	

Serviced accommodation includes hotels, guesthouses, inns, B&B and farms. Paying guest refers to overseas visitors staying in private houses (e.g. language school students). Other trips includes nights spent in transit, in lorry cabs and other temporary accommodation.

Staying visitors - Purpose of trip

Trips by purpose

	UK		Overseas		Total	
Holiday	441,000	73%	18,000	27%	459,000	68%
Business	73,000	12%	11,000	17%	84,000	13%
Friends & relatives	79,000	13%	34,000	51%	113,000	17%
Other	12,000	2%	3,000	5%	15,000	2%
Study	0	0%	0	0%	0	0%
Total	2024	605,000	66,000		671,000	
Comparison	2023	624,000	64,000		688,000	
Difference		-3%	3%		-2%	

Nights by purpose

	UK		Overseas		Total	
Holiday	1,929,000	83%	102,000	23%	2,031,000	73%
Business	140,000	6%	36,000	8%	176,000	7%
Friends & relatives	233,000	10%	271,000	61%	504,000	18%
Other	23,000	1%	31,000	7%	54,000	2%
Study	0	0%	4,000	1%	4,000	0%
Total	2024	2,325,000	444,000		2,769,000	
Comparison	2023	2,189,000	405,000		2,594,000	
Difference		6%	10%		7%	

Spend by purpose

	UK		Overseas		Total	
Holiday	£100,569,000	77%	£4,752,000	30%	£105,321,000	72%
Business	£18,285,000	14%	£1,743,000	11%	£20,028,000	14%
Friends & relatives	£10,449,000	8%	£7,921,000	50%	£18,370,000	12%
Other	£1,306,000	1%	£1,267,000	8%	£2,573,000	2%
Study	£0	0%	£158,000	1%	£158,000	0%
Total	2024	£130,609,000	£15,841,000		£146,450,000	
Comparison	2023	£126,646,000	£15,515,000		£142,161,000	
Difference		3%	2%		3%	

Day visitors

Total volume and value of day trips

	Trips		Spend	
Urban visits	3,898,000		£148,487,000	
Countryside visits	3,180,000		£104,211,000	
Coastal visits	4,696,000		£153,909,000	
Total	2024	11,774,000	£406,607,000	
Comparison	2023	12,053,000	£385,826,000	
Difference		-2%	5%	

Value of tourism

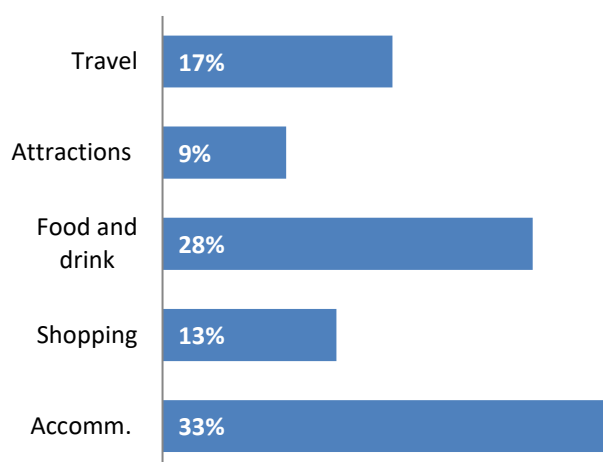
East Suffolk - 2024

Expenditure associated with trips:

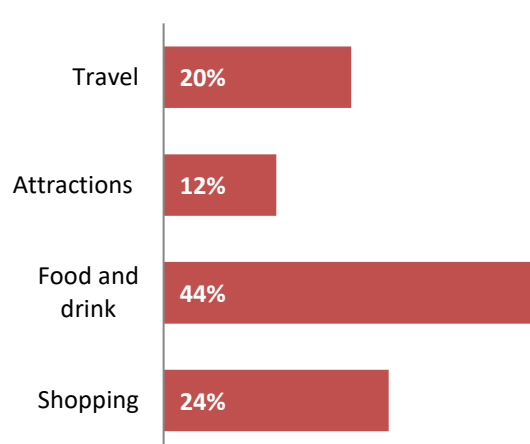
Direct expenditure associated with trips

	Accomm.	Shopping	Food and drink	Attractions	Travel	Total
UK visitors	£44,407,100	£14,367,000	£36,570,500	£11,754,800	£23,509,600	£130,609,000
Overseas visitors	£4,118,700	£4,593,900	£3,801,800	£1,742,500	£1,584,100	£15,841,000
Total staying	£48,525,800	£18,960,900	£40,372,300	£13,497,300	£25,093,700	£146,450,000
Total staying (%)	33%	13%	28%	9%	17%	100%
Total day visitors	£0	£97,585,700	£178,907,100	£48,792,800	£81,321,400	£406,607,000
Total day visitors (%)	0%	24%	44%	12%	20%	100%
Total 2024	£48,525,800	£116,546,600	£219,279,400	£62,290,100	£106,415,100	£553,057,000
%	9%	21%	40%	11%	19%	100%
Comparison 2023	£46,013,000	£111,261,000	£210,025,000	£59,962,000	£100,724,000	£527,985,000
Difference	5%	5%	4%	4%	6%	5%

**Breakdown of expenditure
Staying visitors**



**Breakdown of expenditure
Day visitors**



Other expenditure associated with tourism activity

Other expenditure associated with tourism activity - Estimated spend				
Second homes	Boats	Static vans	Friends & relatives	Total
£9,881,000	£3,949,000	£6,731,000	£21,787,000	£42,348,000

Spend on second homes is assumed to be an average of £2,200 on rates, maintenance, and replacement of furniture and fittings. Spend on boats assumed to be an average of £2,500 on berthing charges, servicing and maintenance and upgrading of equipment. Static van spend arises in the case of vans purchased by the owner and used as a second home. Expenditure is incurred in site fees, utility charges and other spending and is estimated at £2,500. Additional spending is incurred by friends and relatives as a result of people coming to stay with them. A cost of £225 per visit has been assumed based on national research for social and personal visits.

Direct turnover derived from trip expenditure

Business turnover arises as a result of tourist spending, from the purchase of supplies and services locally by businesses in receipt of visitor spending and as a result of the spending of wages in businesses by employees whose jobs are directly or indirectly supported by tourism spending.

		Overnight trips	Day trips	Total trips
Accommodation		£48,914,000	£3,592,000	£52,506,000
Retail		£18,483,000	£94,672,000	£113,155,000
Catering		£39,778,000	£174,209,000	£213,987,000
Attractions		£13,532,000	£52,271,000	£65,803,000
Transport		£15,447,000	£49,118,000	£64,565,000
Non-trip spend		£42,348,000	£0	£42,348,000
Total Direct	2024	£178,502,000	£373,862,000	£552,364,000
Comparison	2023	£169,159,000	£355,343,000	£524,502,000
Difference		6%	5%	5%

Adjustments have been made to recognise that some spending on retail and food and drink will fall within attractions or accommodation establishments. It is assumed that 40% of travel spend will take place at the origin of the trip rather than at the destination.

Supplier and income induced turnover

		Overnight trips	Day trips	Total trips
Indirect spend		£44,921,000	£91,266,000	£136,187,000
Non trip spending		£8,470,000	£0	£8,470,000
Income induced		£20,738,000	£11,688,000	£32,426,000
Total	2024	£74,129,000	£102,954,000	£177,083,000
Comparison	2023	£70,591,000	£97,700,000	£168,291,000
Difference		5%	5%	5%

Income induced spending arises from expenditure by employees whose jobs are supported by tourism spend.

Total local business turnover supported by tourism activity – Value of tourism

		Overnight trips	Day trips	Total trips
Direct		£178,502,000	£373,862,000	£552,364,000
Indirect		£74,129,000	£102,954,000	£177,083,000
Total Value	2024	£252,631,000	£476,816,000	£729,447,000
Comparison	2023	£239,750,000	£453,043,000	£692,793,000
Difference		5%	5%	5%

Employment

East Suffolk - 2024

Employment

The model generates estimates of full time equivalent jobs based on visitor spending. The total number of 'actual' jobs will be higher when part time and seasonal working is taken into account. Conversion of full time equivalent jobs into actual jobs relies on information from business surveys in the sectors receiving visitor spending.

Direct employment

Full time equivalent (FTE)				
	Overnight trips	Day trips	Total trips	
Accommodation	867	64	931	12%
Retailing	168	862	1,030	13%
Catering	686	3,004	3,690	46%
Entertainment	240	928	1,168	14%
Transport	106	336	442	5%
Non-trip spend	784	0	784	10%
Total FTE	2024	2,851	5,194	8,045
Comparison	2023	2,694	4,930	7,624
Difference		6%	5%	6%

Estimated actual jobs				
	Overnight trips	Day trips	Total trips	
Accommodation	1,283	94	1,377	12%
Retailing	253	1,294	1,547	13%
Catering	1,029	4,507	5,536	48%
Entertainment	339	1,309	1,648	14%
Transport	149	474	623	5%
Non-trip spend	894	0	894	8%
Total Actual	2024	3,947	7,678	11,625
Comparison	2023	3,748	7,287	11,035
Difference		5%	5%	5%

Indirect & induced employment

Full time equivalent (FTE)			
	Overnight trips	Day trips	Total trips
Indirect jobs	989	1,690	2,679
Induced jobs	384	216	600
Total FTE	2024	1,373	1,906
Comparison	2023	1,307	1,809
Difference		5%	5%

Estimated actual jobs			
	Overnight trips	Day trips	Total trips
Indirect jobs	1,127	1,927	3,054
Induced jobs	438	247	685
Total Actual	2024	1,565	2,174
Comparison	2023	1,490	2,063
Difference		5%	5%

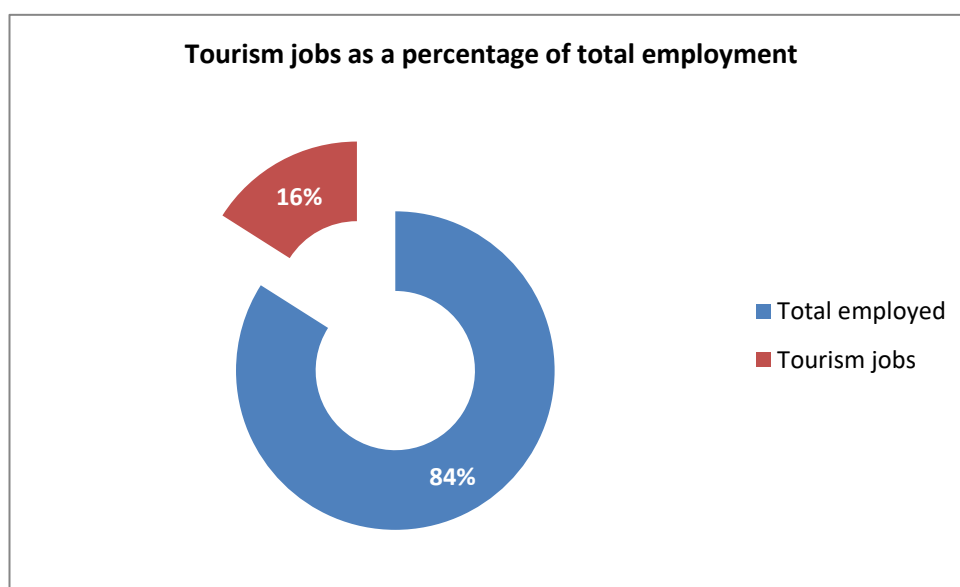
Total jobs

Actual jobs are estimated from surveys of relevant businesses at locations in England and take account of part time and seasonal working.

Full time equivalent (FTE)						
	Overnight trips		Day trips		Total trips	
Direct	2,851	68%	5,194	73%	8,045	71%
Indirect	989	23%	1,690	24%	2,679	22%
Induced	384	9%	216	3%	600	5%
Total FTE 2024	4,224		7,100		11,324	
Comparison 2023	4,001		6,740		10,741	
Difference	6%		5%		5%	
Estimated actual jobs						
	Overnight trips		Day trips		Total trips	
Direct	3,947	72%	7,678	78%	11,625	76%
Indirect	1,127	20%	1,927	19%	3,054	20%
Induced	438	8%	247	3%	685	4%
Total Actual 2024	2,014		9,852		15,364	
Comparison 2023	5,238		9,350		14,588	
Difference	-62%		5%		5%	

Tourism jobs as a percentage of total employment

	Overnight trips	Day trips	Total trips
Total employed	73,700	97,000	97,000
Tourism jobs	2,014	9,852	15,364
Proportion all jobs	2.7%	10.0%	16.0%
Comparison 2023	5,238	9,350	14,588
Difference	-62%	5%	5%



The key 2024 results of the economic impact assessment are:

12.4 million trips were undertaken in the area.

11.8 million day trips.

0.7 million staying trips.

2.8 million nights in the area as a result of staying trips.

£553 million spent by tourists during their trip to the area.

£46 million spent on average in the local economy each month.

£146 million generated by staying trips.

£407 million generated from irregular day trips.

£729 million spent in the local area as result of tourism, taking into account multiplier effects.

15,365 jobs supported, both for local residents and for those living nearby.

11,625 tourism jobs directly supported.

3,739 non-tourism related jobs supported linked to multiplier spend from tourism.

Appendix I - Introduction about Cambridge Model

This report examines the volume and value of tourism and the impact of that expenditure on the local economy. The figures were derived using the Cambridge Economic Impact Model and the research was undertaken by Destination Research.

Data sources

The main national surveys used as data sources in stage one include:

- Domestic tourism statistics: An online survey collecting data on both domestic overnight trips as well as domestic day trips.
- International Passenger Survey (IPS) information on overseas visitors to the UK.

These surveys provide information down to a regional level. In order to disaggregate data to a local level the following information sources are used:

- Records of known local accommodation stock
- VisitEngland's surveys of Visits to Attractions, which provides data on the number of visitors to individual tourist attractions
- Attractions data supplied by ALVA (Association of Leading Visitor Attractions)
- Short-term rental stock and occupancy - Lighthouse / AirDNA
- Hotel market data and benchmarking – STR
- Latest estimates of resident population as based on the Census of Population
- Selected data from ONS employment-related surveys
- Selected data on the countryside and coast including national designations and length of the coastline (where relevant).

The model also includes contextual and sector-specific data from third-party sources and destination-level business performance data captured by or on behalf of our destination partners. Data sources include:

- Tourism business counts - Inter Departmental Business Register (IDBR)
- UK inflation data - Consumer Prices Index (CPI, CPIH), Retail Prices Index (RPI)
- UK economy forecasts - Office for Budget Responsibility: Economic and fiscal outlook
- Footfall data (town centres, large retail outlets and car parks).

Limitations of the Model

It should be noted that the model cannot take into account any leakage of expenditure from tourists taking day trips out of the area in which they are staying. While it is assumed that these may broadly balance each other in many areas, in locations receiving significant numbers of day visitors from London, there is likely to be an underestimate in relation to the number of overseas day visitors staying in holiday accommodation in London. Whilst it is important to be aware of these issues, we are confident that the estimates we have produced are as reliable as is practically possible within the constraints of the information available.

Rounding

All figures used in this report have been rounded. Therefore, in some tables there may be a slight discrepancy between totals and sub totals.

Staying Visitors

Data on domestic overnight visits is based on a new combined online survey that replaced the separate Great Britain Tourism Survey and Great Britain Day Visits Survey. It provides information on the total number of trips to the region and the relative proportions using different types of accommodation. By matching these figures to the supply of such accommodation, the regional average number of trips per bedspace or unit of accommodation can be derived. The International Passenger Survey (IPS) provides information on the total number of trips by overseas visitors to the region. The model uses three year rolling averages to reduce extreme highs and lows which are due to small sample sizes, rather than being a reflection on drastic changes in demand year-on-year.

Day Visitors

Information on day trips at a regional level is available from a new combined online survey that replaced the separate Great Britain Tourism Survey and Great Britain Day Visits Survey. The new survey includes all leisure-related trips from home. It should be noted that a large proportion are local trips made by people resident in the locality. The model uses information from the survey to estimate the number of longer day trips (defined as those lasting at least 3 hours and involving travel of more than 20 miles) and irregular trips lasting more than 3 hours.

Impact of tourism expenditure

This section examines the impact of the tourism expenditure in terms of the direct, indirect and induced expenditure as well as an estimate of actual jobs (both direct and indirect) supported by tourism expenditure in the district.

The above-mentioned surveys offer a breakdown of visitor spending. The impact of this initial round of expenditure will be subsequently increased by multiplier effects. These arise from the purchase of supplies and services by the businesses in receipt of visitor expenditure (indirect impacts), and by the income induced-effects arising from the spending of wages by employees in the first round of business and in subsequent expenditure in supplier business (induced impacts).

The New Earnings Survey which provides information on wage levels by industry sector and region is an internal business database which includes data on the structure of business expenditure, local linkages and multiplier ratios drawn from a wide range of business and economic studies carried out by Geoff Broom Associates, PA Cambridge Economic Consultants and others. By applying the breakdown to the estimates of visitor spending, the model generates estimates of total direct spending.

Evidence from national studies suggests that some minor adjustments are required to match visitor spend to business turnover – for example, some expenditure on food and drink actually takes place in inns and hotels that fall in the accommodation sector and within attractions. More significantly, expenditure on travel costs associated with individual trips is equally likely to take place at the origin of the trip as the destination. Therefore the model assumes that only 40% of travel expenditure accrues to the destination area.

Number of full time job equivalents

Having identified the value of turnover generated by visitor spending, it is possible to estimate the employment associated with that spending. Wages for staff and drawings for the proprietors will absorb a proportion of that turnover. By applying these proportions to the overall additional turnover in each sector, the amount of money absorbed by employment costs can be calculated. The New Earnings Survey provides data from which the average costs by business sector, adjusted to take account of regional differences, can be calculated.

After allowing for additional costs such as National Insurance and pension costs, an average employment cost per full time equivalent job can be estimated. The number of such jobs in the local area can then be estimated by dividing the amount of business expenditure on wages and drawings by the average employment cost per job.

Number of Actual Jobs

The model generates estimates of full time equivalent jobs based on visitor spending. However, the total number of actual jobs will be higher when part time and seasonal working is taken into account. The full time equivalent jobs arising directly from visitor spending are converted into actual jobs using information from business surveys in the sectors receiving visitor spending (principally accommodation, food and drink, retail, attractions, transport). In general, the conversion factor between full time equivalent jobs and actual jobs varies around 1.5 in those sectors.

The indirect and income-induced jobs arise across a much wider range of employment sectors. Therefore, the average 1.16 for all sectors based on Census of Employment data has been used to convert full time equivalent jobs in this sector to actual jobs.

The employment estimates generated by the model include both self-employed and employed people supported by visitor expenditure. The model also includes an estimate of the additional jobs arising in the attractions sector, which are not related to visitor expenditure. However, the numbers do not include other tourism-related employment such as jobs in local authorities arising from their tourism functions, e.g. tourist information staff, additional public health, parks and gardens, public conveniences, maintenance sections and jobs arising from capital investment in tourism facilities.

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