



SUFFOLK ENERGY ACTION SOLUTIONS'

SEAS REBUTTAL of APPLICANT'S RESPONSE TO SEAS WR Socio- Economics, Tourism & Leisure

SEA LINK: EN020026

SEAS IP: [REDACTED]

DEADLINE: 3 – January 9, 2026

Date: 19 Jan 2026

RE: SEAS rebuttal of 9.79: Applicant's Comments on Written Representations [REP2-034] Suffolk Energy Action Solutions – Socio- Economics, Tourism & Leisure refers. Pages 358- 363 Table 2.41

Introduction

This submission is provided in response to SEAS's rebuttal of 9.79: Applicant's Comments on Written Representations [REP2-034],

SEAS raised *thirty-eight points under five separate matters* in response to NG's response to NG's reaction to the Relevant Representations on Socioeconomics, Tourism and Recreation. *Thirty-four of the thirty-eight points have been effectively dismissed by NG on the basis that they have already provided answers to the questions or objections raised or new information offered.*

Specifically, as an example is the lack of evaluation of the effect on the economy of the local area because of the combination of NSIPs. The Applicant states that they have “undertaken a complete assessment of socio-economic, recreation and tourism and concluded that there are no anticipated significant effects because of the proposed project”.

The Applicant does not refute the point raised by SEAS that 70% of the local economy is driven by tourism but this is not assumed in their complete assessment. Nor is the loss of 17% of tourism visits as predicted in the BVA research. The Applicant has not considered it worthwhile to conduct any new assessment in the light of points raised.

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Ref.	Matter	SEAS Points Raised	Applicants Comments	SEAS Counter Comments
	Tourism & Snape Maltings	<p>In 2024, tourism generated £730 million in East Suffolk and directly employed over 15,000 full-time equivalent workers, representing 16% of the district's local area and wishes to reassure stakeholders that these considerations workforce. The Minsmere, Friston, and Saxmundham area is the epicentre of this sector. Its economy is deeply interwoven with recreation and tourism which sustains not only hospitality and retail but also construction, maintenance and professional services</p> <p>Snape Maltings alone attracts over 600,000 visitors annually and contributes £37</p>	<p>The Applicant recognises the importance of the tourism economy to the over 15,000 full-time equivalent workers, representing 16% of the district's local area and wishes to reassure stakeholders that these considerations workforce. The area within five miles of Sizewell, including Aldeburgh, Snape, have been taken into account. A complete assessment of socio-economic,</p> <p>The Applicant recognises that Snape Maltings is an important local tourism and economic asset within East Suffolk and has demonstrated resilience and sustained visitor appeal in a context where multiple NSIP developments, including Sizewell C and East Anglia ONE North and TWO, are under construction.</p> <p>Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism [REP1A-005] includes an assessment of tourism assets in terms of any temporary or permanent land take impacts and severance of access. As Snape Maltings Concert Hall is located approximately 3.26 km from the closest point of the Order Limits, there are not anticipated Scheme. Potential impacts on access and severance were informed by Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], which concluded there are no significant effects in terms of severance on the roads assessed during to be any land take/land use changes for the receptor arising from the Suffolk Onshore construction, and therefore no significant severance effects between residents or visitors and tourism assets, including Snape Maltings, due to the Suffolk Onshore Scheme.</p>	<p>Snape Maltings, with over 500,000 visitors p.a. is one of the largest tourist destinations in East Anglia. The only access to this destination is by road. NG contend that visitor attractions are only affected by development activity within a 500m buffer area. This cannot cover disruption to road access resulting in longer drive times to tourist destinations that will deter potential visitors.</p>

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		<p>million to the local economy. Britten Pears Arts (BPA), which operates of Snape Maltings and The Red House supports over 200 jobs and generates £14 million in income Through a hybrid model of cultural programming, retail.</p> <p>As Alison Andrews, Chair of The Alde and Ore Association stated at Open Floor Hearing 1, "the imposition of several NSIPs conflicts completely with the attractions that enable the area to earn 70% of its economy from tourism." This is not a marginal concern; it is an existential one.</p>	<p>Amenity impacts on the users of private, community, recreation and tourist assets within 500 m of the Order Limits are assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. Given the distance between Snape Maltings Concert Hall and the Proposed Project, there are unlikely to be any significant adverse amenity effects on users with regards to noise, air quality or landscape and visual which would deter visitors from the tourist attraction</p> <p>As a result, there is no source-impact-receptor pathway identified that is likely to lead to a significant socio-economic, recreation and tourism effect on Snape Maltings. Taken as a whole, the Applicant's case is that visitors would not be significantly deterred from visiting this part of Suffolk, they would not be impacted on their journey to Snape Maltings, and visitors would not be impacted whilst at the venue in terms of reduced amenity. For this reason, the Applicant disagrees that there would potentially be a material impact on visitors and income.</p>	
1 2		Visitors come to Suffolk for its sense of escape, its fresh air, big skies and cultural escape.	A response to this comment can be found in Table 260 (reference 2.4) Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].	SEAS wishes to emphasise that point that the core of the Suffolk (and especially the Suffolk Heritage Coast) tourism brand is about getting away from the rush and coming to an area of open skies and countryside, cultural and historic richness and small-scale villages and market

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				<p>towns with individuality. NG rebut the view that the combined energy developments will have a significantly detrimental effect on tourism during the development phase, and they state that all will be returned to normal post development.</p> <p>The evidence of the Applicant is highly contentious. They do not address the long-term effect of a change in image and perception that is inevitable because of some 12 years of the heaviest industrial development in Europe, the presence of massive industrial buildings in place of beach, open fields, woodland and all the nature that they support. This change of image, from recreational to industrial will not only affect the immediate locality but Suffolk which will lose one of the main contributors to its appeal to visitors.</p> <p>We contend that the Sea Link proposal is the key factor in tipping the balance. Arguably, Sizewell C, once built, will not change perception. The wholesale conversion of the Friston/Saxmundham area in addition to Sizewell C will undoubtedly do so.</p> <p>This deserves a detailed study.</p>
1 6	James Jenkins (a local business owner) spoke at the OFH 1 and shared a poignant encounter with long-time visitors who, after ten years of returning, said they were unlikely to come back. Their departure	The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for Sea Link, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Our review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not		<p>The Applicant's comments, on a resident's example of a visitor who would not return because of the developments, are that they have used the same methodology for assessing economic impact as other NSIPs. This may be the case, but the result will depend on the inputs rather than the methodology. The Applicant also comments that there was no ill effect on tourism from Sizewell B or Hinkley Point. Sizewell B was a single development on a much smaller scale and Hinkley Point is again a single development and served by vastly</p>

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		<p>ripples outward: no hotel booking, no conservation donation, no car park fee, no museum visit, no tearoom meal, no studio purchase.</p> <p>“That meant I couldn’t pay my bills that week,” he said. These are not abstract losses; they are real-world consequences.</p>	<p>translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A005].</p>	<p>superior access roads. In the Applicant’s assessment, this methodology seems to carry more weight than the BVA research or Sizewell C’s own research which suggested that 39% of visitors might be discouraged from returning. NG state that surveys such as these are “limited by methodological weaknesses”.</p>
2 1	The Proposals and the Cumulative Threat .	<p>In terms of traffic/transport, the Proposals presently before the Examining Authority will add 346 HGV movements per day to the 870 already generated by Sizewell C, significantly increasing peak traffic, and giving rise to a range of harmful impacts even outside the peaks</p>	<p>The assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is based on a daily peak of 173 HGVs (346 HGV movements including 173 arrivals and 173 departures) associated with the Suffolk Onshore Scheme. This represents the busiest single day of the programme in terms of HGV activity, which is expected to occur in 2027. A further review of potential overlaps with Sizewell C has been carried out within Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]. This concludes that the peak construction phases for each scheme are planned to be staggered (between 2026 and 2030) and are therefore highly unlikely to all fully overlap. The duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) will be limited to a few consecutive months and due to short-term temporary duration of any potential adverse impacts, the residual effect cannot therefore be considered as significant (duration of effect is a consideration identified in paragraph 1.27 of the 2023</p>	<p>In response to a point raised on cumulative traffic impact, the Applicant states there will be little overlap of project peaks and the residual effect cannot be considered significant. They continue to believe that their baseline of January & February traffic is reasonable and seasonal variances immaterial despite a calculated uplift in seasonal traffic of some 30%. They fall back on “normal methodology for NSIPs” as being satisfactory in a heavily tourist location. They state that their baseline figures are “appropriate and robust” and SEAS position is that they are neither.</p>

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			IEMA Guidelines for the Environmental Assessment of Traffic and Movement).	
2 9	Consequences for Tourism and the Local Economy, and Recreation	The simultaneous construction of multiple NSIPs, plus other major non-NSIP projects, will overwhelm local infrastructure.	<p>Potential cumulative impacts on the local services, including social infrastructure and visitor and tourism accommodation, are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]. This analysis demonstrates that under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor.</p> <p>Additionally, it is acknowledged that the construction workforce required for the Suffolk Onshore Scheme in combination with other NSIPs would place additional demand on the local health facilities. Considering a worst case scenario, whereby the peak construction workforce for the Suffolk Onshore Scheme and the construction of each of the other developments coincide, and each worker demands primary healthcare, there is likely to be additional demand on local facilities. The additional demand has the potential to increase the GP:Patient Ratio in the study area however even in the worst-case the ratio is predicted to remain broadly in line with the recommended provision.</p>	<p>The point raised is that the simultaneous construction of multiple NSIPs will overwhelm local infrastructure. The Applicant's response is that there will be no significant effect of accommodation provision and that GP patient ratio will remain broadly in line with the recommended provision. There is already a very evident effect on local housing rents and a transfer of hospitality provision from tourists to construction workers. Assuming a peak combined workforce of 12,000 this will double the population of the Saxmundham, Leiston and Aldeburgh area. It is hard to believe that these are the assumption that have generated the conclusion to which NG has arrived.</p>
3 6- 3 8	Conclusions	Tourism in East Suffolk is not just economically vital; it is culturally and environmentally irreplaceable. Its success depends on	A response to this comment can be found in Table 2.60 (References 4.1 to 4.6) of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]. proposed infrastructure projects	The Applicant has failed to undertake any further research or adjust any of the assumptions made in their assessment of the impact of Sea Link alone or the combination of NSIPs. They simply refer to and reiterate their original proposal, ignore counter argument and refuse to consider alternate methodologies.

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		<p>tranquillity, landscape, Heritage and nature. All of which are threatened by the scale and timing of proposed infrastructure projects (as is residents own ability to access recreation).</p> <p>SEAS urges the Examining Authority to reject the notion that impacts are limited to isolated attractions, to demand a full cumulative assessment covering traffic, visitor behaviour, business viability and long-term economic outcomes, and to recognise that East Suffolk is fundamentally unsuited to hosting the nation's largest concentration of energy infrastructure. To proceed without robust assessment is</p>	<p>A response to this comment can be found in Table 2.60 (References 6.1 to 6.6) of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043]</p> <p>A response to this comment can be found in Table 2.60 (References 6.1 to 6.6) of Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP1A-043].</p>	

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		<p>to risk thousands of jobs, hundreds of businesses, and the long-term resilience of one of England's most successful tourism destinations. The reality is, in any event, already apparent from the early stages of Sizewell C: the area simply will not bear these Proposals as well.</p>		

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