

SEAS WRITTEN RESPONSE TO THE ISH2 ORAL REPRESENTATIONS on
SOCIO-ECONOMICS and TOURISM

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This document constitutes SEAS written response to ISH2 on Socio-economics and Tourism

No Price or Accommodation Type Analysis Was Undertaken

1. During ISH2 the Applicant (NGET) admitted, through its witness (Mr Dave Wieger as recorded in the ISH2 transcript) it has surveyed for available accommodation with no regard whatsoever to the price of accommodation and blind to the different types of accommodation. The assessment only counted rooms, it did not consider: Price, Type of accommodation or Suitability.
2. After East Suffolk Council raised the issue of pricing, the ExA asked the Applicant directly: “So at the moment you've looked simply at the amount of rooms available, not necessarily the type of room cost of room, anything like that that doesn't go into it.” The Applicant’s response: “On behalf of the applicant. That's correct.”
3. So, the Applicant has simply not fed that vital data into its assessment. As such, the Applicant’s claim that housing the construction workforce of these Proposals and all projects, cumulatively, will present no issue in terms of the availability of tourist accommodation, is unsupported by any analysis of price or typology.
4. The significance of this omission is reflected in the ExA’s Action Point 102 (EV6-033).

Absence of Rental Market Impact Assessment

5. The Applicant also admitted, again through Mr Wieger that it has given no consideration to the impact on local rental costs of this Proposal or all projects cumulatively. No rental price modelling, demand impact modelling, inflationary effect assessment or cumulative rental market assessment
6. The ExA asked: “And what would that likely do. Do you think for rental costs across the area with that uplift of demand at that time.”
7. Mr Wieger responded: “That level of analysis hasn't been undertaken as part of the scope of the work. So... couldn't answer that.” Later, he reinforced this when

discussing cumulative impacts: "...yes, you'd make use of the private rental sector, as I said, haven't done analysis of changes in prices or anything like that."

8. These concerns are reflected in the ExA's Action Point 104 (EV6-033).

The 'Substitution' Myth: Why Worker Spend is a Net Loss

9. The Applicant has not assessed whether worker expenditure is economically equivalent to displaced tourism expenditure.
10. National Grid suggests that construction workers will 'offset' the loss of tourists, but the maths does not work. In 2025, a domestic leisure tourist in England spends an average of £111 per night (Domestic GB Tourism Statistics: July-September 2025 - Visit England - Quarter 3) and premium areas often have a higher spend. Whereas the daily spend of a construction worker is a fraction of that, often targeting budget 'commodity' services rather than our high-margin 'premium' hospitality (East Suffolk Council have expressed concern on this point). Replacing high-value visitors with industrial workers is not a mitigation; it is a permanent 60-70% drain on our local economic value (DMO report 2019).
11. NGET ignores the 'Double Squeeze' on our economy. By driving up accommodation prices to house their workforce, they aren't just 'supporting' hotels; they are actively pricing out our high-spending leisure tourists. Every room taken by a worker—even at a premium—represents a 100% loss of the £111 daily discretionary spend that keeps our independent shops, arts venues and galleries alive. This isn't growth; it's the industrial cannibalisation of a £693 million tourism brand

Brand Fragility & Cumulative Impact:

12. The Suffolk Coast's £693 million tourism economy is built on a specific brand: tranquillity and natural heritage. In 2025, research shows that 50% of our visitors are 'Country Loving Traditionalists' who flee industrialisation. By failing to model the cumulative impact of Sea Link alongside EA1N/EA2, LionLink and Sizewell C, NGET is ignoring a 'reputational tipping point' that threatens 14,600 local jobs.
13. Once again relevant here, East Suffolk Council noted that "the number of NSIPs either consented or to be developed over the next decade is unprecedented and potentially without comparison."
14. Relying on single-project comparator precedents is no substitute for a location-specific, cumulative impact assessment, reflecting sustained construction activity

over multiple years. The cumulative cluster is not only spatially concentrated but temporally extended, as reflected in East Suffolk Council's commissioning of a 14-year longitudinal visitor perception study (see below).

15. The continuing uncertainty surrounding cumulative tourism and perception effects is reflected in the ExA's Action Points 101 and 107 (EV6-033).

Absence of Quantitative Attitudinal Baseline and Monitoring

16. The Applicant has not carried out the quantitative attitudinal survey that is a prerequisite for understanding the likely impact of the Proposals on tourism and the local economy, alone and cumulatively, nor has it established a baseline for monitoring and adaptive management (on which East Suffolk Council has been left to do the work). This is yet another instance of the Applicant not truly assessing in any meaningful sense.
17. At ISH2, SEAS (Fiona Gilmore) drew attention to the absence of any up-to-date quantitative attitudinal survey of regular and first-time visitors in light of the cumulative energy projects in coastal Suffolk. She also pointed out that Hinkley Point is not a suitable benchmark, with the Quantock landscape area not of the same financial tourism value as the Aldeburgh to Southwold coastal Suffolk area, road access/congestion not an issue for Hinkley but a significant issue in coastal Suffolk, and Hinkley being a single project vs coastal Suffolk which has been invited to host at least seven major NSIP projects in a seven square mile area. SEAS requested the ExA to mandate a full, location-specific audit before the project proceeds and suggested that the DMO and Applicant work together to ensure that all stakeholders are satisfied with the objectives and methodology.
18. The Applicant has relied on comparator material (including Sizewell C and Hinkley Point survey evidence) in support of its conclusions. It has not engaged with the DMO or other stakeholders, and has not commissioned a fresh, stakeholder-informed, location-specific quantitative perception study reflecting the cumulative cluster of NSIPs described by East Suffolk Council as "unprecedented and potentially without comparison"
19. When pressed by the Examining Authority on the need for pre-construction baseline monitoring and adaptive management, the Applicant did not confirm that any such cumulative perception baseline had been undertaken. Instead, the Applicant relied on previous survey material and indicated that conducting robust surveys presents methodological challenges. When asked whether a fresh survey might now produce

different results, the Applicant stated that it was “quite difficult to give you a response on that at this stage”

20. In contrast, East Suffolk Council accepted the importance of attitudinal surveys and confirmed that it has commissioned a longitudinal visitor perception study, with baseline data to be submitted at Deadline 4, and which will be repeated over time to understand perception shifts and enable reaction where necessary.

21. The Applicant has therefore not established:

- a. A current, location-specific quantitative attitudinal baseline;
- b. A cumulative perception assessment across multiple NSIPs;
- c. A monitoring framework capable of adaptive management.

22. In those circumstances, any conclusion that the Proposals will not materially affect visitor behaviour, expenditure or business viability is unsupported by primary, up-to-date perception evidence.

23. The continuing absence of a cumulative, location-specific quantitative attitudinal baseline is reflected in the ExA's Action Point 101 (EV6-033).

Precautionary Approach – Worst Case Basis

24. In the absence of a cumulative, location-specific quantitative baseline, and given the acknowledged difficulty of forecasting socio-economic and tourism impacts in a cluster of projects described by East Suffolk Council as “unprecedented and potentially without comparison”, it is not possible to conclude with confidence that effects would be less than significant and major adverse (using what SEAS understands to be the Applicant's grading, the highest impact). In circumstances of acknowledged uncertainty, absence of modelling, and unresolved cumulative quantification—including worst-case rental demand (Action Point 104), assessment on a worst-case cumulative basis is required.

Working Hours in a Worst-Case Cumulative Context

25. Action Point 106 (EV6-033) demonstrates that working hours remain a live matter within the Examination. However crucially, in a cumulative context involving multiple overlapping NSIPs impacting the same area, the issue extends beyond individual bank holidays.

26. Divergence in working hour controls between projects risks removing coordinated periods of respite for communities and visitors. EA1N and EA2 secured restrictions of 07:00–19:00 Monday–Friday, 07:00–13:00 Saturday, with no Sunday or bank holiday working. In what must be treated as a worst-case cumulative impact scenario, the absence of equivalent controls for Sea Link would contribute to continuous rather than intermittent cumulative effects across a range of receptors, particularly during peak tourism periods.
27. Weekends and bank holidays are peak visitor and high-value trading periods, and are central to the coastal tourism economy. Working during peak tourism periods has a disproportionate economic and perceptual impact.
28. In these circumstances, alignment with the working hour restrictions secured for EA1N and EA2 would materially reduce cumulative socio-economic, tourism and local community effects, and would provide predictable periods of respite within an otherwise prolonged duration construction environment.

End