



SEAS REBUTTAL of APPLICANT'S REP4-236 RESPONSE TO SEAS REP3-139

SOCIO-ECONOMICS, TOURISM and LEISURE

SEA LINK: EN020026
DEADLINE: 5 – 10 March 2026

SEAS IP: [REDACTED]
Date: 10 March 2026

RE: SEAS rebuttal of 9.116 Applicant's Comments on Selected Other Late Submissions Received at Deadline 3 [REP4-236 Table 3.3] – in particular comments on SEAS REP3-139 Socio-Economics, Recreation & Tourism.

Introduction

This submission provides SEAS response to the Applicant's comments in **REP4-236** on SEAS late Deadline 3 submission (**REP3-139**) concerning tourism and socio-economic impacts. In multiple instances the Applicant's response does not address the specific issue raised by SEAS but instead refers back to earlier submissions, including the Environmental Statement Socio-Economics and Tourism Assessment chapter (**REP1A-005**) and related documents, without revisiting the underlying assumptions of the assessment.

Across a number of tourism and socio-economic issues the Applicant's assessment relies on assumptions for which the underlying data or methodology is not fully explained. In such circumstances it is not appropriate to rely on those assumptions to support a conclusion that no significant adverse effects are anticipated. Where uncertainty exists, the EIA assessment should test a reasonable worst-case scenario rather than assume that effects will be negligible. Clarification of the underlying data and assumptions is therefore necessary. The rebuttals set out below therefore focus on whether the Applicant's responses substantively address the points raised during the Examination and whether the conclusions relied upon remain supported in light of the issues identified by SEAS and the further clarification requested by the Examining Authority.

The tourism economy of the Suffolk coast is closely tied to the distinctive qualities of the Aldeburgh area. Aldeburgh in particular combines an unspoilt coastal setting, historic townscape and internationally recognised arts culture centred on the Aldeburgh Festival and Snape Maltings. Visitors are drawn by the experience of tranquillity, landscape character and cultural identity of the area rather than by conventional resort infrastructure. This makes for high-quality tourism demand which is particularly sensitive to changes in landscape character, tranquillity of the local environment and visitor experience. SEAS therefore urges the Examining Authority to reiterate the need for the Applicant to assess these location-specific qualities accurately when evaluating potential tourism effects.

Further work with the Suffolk Coast Destination Management Organisation (DMO), including updated visitor perception research (quantitative attitudinal study), would assist in understanding how the cumulative infrastructure proposals affecting the Suffolk coast may influence visitor behaviour and destination image. This further research is fundamental, otherwise the scale of risk and their significant adverse cumulative effects attached to these proposals, cannot be properly assessed. Evidence from local tourism businesses also indicates that concerns about the concentration of infrastructure proposals are already affecting visitor booking behaviour, reinforcing the importance of properly evaluating destination image and visitor perception.

SEAS Rebuttals of Applicant's comments (REP4-236 Table 3.3) on SEAS late Deadline 3 submission [REP3-139]

Ref	Matter	Point Raised	Applicant's Comments	SEAS' Rebuttals
	Tourism & Snape Maltings	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	A response to this issue regarding the impacts of the Proposed Project on Snape Maltings is set out in response to 1SERT6 in Application Document 9.73 Applicants Response to First Written Questions [REP3-069] . Section 10.9 of Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-	The Applicant's response refers to the 500 m study area used in the Environmental Statement (REP1A-005) and to conclusions from the traffic severance assessment. However, SEAS' point relates to potential deterrence of visitors arising from disruption to road access and travel experience. Neither the 500 m proximity threshold used

		<p>to tourist destinations that will deter potential visitors.</p>	<p>economics, Recreation and Tourism [REP1A-005] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment considers impacts on these receptors within a 500 m study area from the Proposed Project's Order Limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. Where appropriate, receptors located beyond 500 m of the Suffolk Onshore Scheme have been included in the assessment to allow for assessment flexibility. The assessment concludes that there are no businesses or tourist attractions within the Study Area which would be significantly affected by the land required for the Suffolk Onshore Scheme or to which access would be required. Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</p>	<p>in REP1A-005 nor the traffic severance assessment in APP-054 evaluates tourism demand or visitor behaviour. The response therefore does not address the issue raised.</p>
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			<p>concludes there are no roads assessed that would experience significant severance effects during construction. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within, and beyond, 500 m of the Order Limits. This has been assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. In light of the topic-specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, landscape and visual or noise that would materially affect health and wellbeing outcomes.</p>	
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12		<p>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</p>	<p>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects – Suffolk [APP-060] sets out the assessment of the Proposed Project in combination with other cumulative schemes, including Sizewell C, in terms of both landscape and visual and socioeconomics, recreation and tourism effects. Although Table 13.35 sets out that there is potential for residual significant cumulative effects on representative viewpoints, the Applicant does not believe this would materially impact the tourism industry in the long-term, either alone or in combination with other Nationally Significant Infrastructure Projects (NSIPs). The Applicant has undertaken a review of other NSIPs and their potential effects on tourism and visitor activity, as detailed in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065], and found that initial concerns observed in surveys have not translated into measurable reductions in visitor</p>	<p>The Applicant refers to the cumulative assessment in APP-060 and to its response to ExQ1 1SERT1 in REP3-069 as addressing the potential impact of the Proposed Project on tranquillity, landscape and tourism. However, neither document evaluates the issue raised by SEAS, which concerns the potential for prolonged and cumulative infrastructure development to alter the image and perception of the Suffolk coastal tourism destination.</p> <p>APP-060 assesses cumulative landscape, visual and socio-economic effects but does not examine how sustained industrialisation of the landscape may influence visitor behaviour or tourism demand. Similarly, the response to 1SERT1 in REP3-069 acknowledges adverse and in places significant localised landscape effects, including perceptual aspects such as tranquillity, but does not evaluate how those effects—particularly when experienced over an extended construction period and alongside other infrastructure</p>
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			<p>numbers or tourism-related employment.</p> <p>A full response to this issue regarding the impact of the Proposed Project on tranquillity, landscape and as a result tourism is set out in response to 1SERT1 in Application Document 9.73 Applicants Response to First Written Questions [REP3-069].</p>	<p>schemes—may affect the attractiveness of the area as a tourism destination.</p> <p>Instead, the response relies largely on a statement that tourism is not expected to be materially affected, supported by reference to comparator projects, rather than providing a location-specific assessment of potential impacts on destination image, visitor perception or tourism demand. The issue raised by SEAS is therefore not addressed.</p> <p>Evidence from local tourism businesses also indicates that concerns about the concentration of infrastructure proposals are already affecting visitor booking behaviour, reinforcing the importance of properly evaluating destination image and visitor perception.</p>
16		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	Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3065] presents evidence from several Nationally Significant Infrastructure Projects	The Applicant relies on comparator evidence presented in REP3-065 , drawing on experience from other NSIPs including Sizewell B and Hinkley Point C. However, those projects

		<p>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 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>	<p>(NSIPs) that there are no material impacts on tourism or visitor numbers.</p> <p>The Applicant considers these NSIPs to be appropriate comparators for the Proposed Project. Each of the cited projects are energy infrastructure developments located in sensitive coastal environments, including areas with high landscape, or environmental value such as National Landscapes, and are therefore relevant when considering potential effects on tourism and visitor assets.</p> <p>Sizewell C, Sizewell B and Hinkley Point C are substantially larger in scale than the Proposed Project and consequently represent a worst-case scenario, with a greater potential for construction and operational effects. In contrast, the Proposed Project is a much smaller scheme with a more limited construction workforce and duration and therefore has the potential for significantly fewer and more localised effects. Given the scale and location of these comparator schemes, their inclusion provides a conservative and appropriate</p>	<p>are not demonstrated to be analogous to the circumstances of the Suffolk coast. In particular, they do not replicate the combination of a fragile tourism destination, a cluster of overlapping NSIPs, and a prolonged period of cumulative infrastructure construction affecting the same coastal area.</p> <p>The reliance on Hinkley Point C as a comparator is also problematic. That project is located in a different tourism context and was delivered as a largely single infrastructure scheme rather than as part of a cluster of overlapping NSIPs. The Suffolk coast, by contrast, faces several concurrent infrastructure projects affecting a relatively small tourism-dependent landscape centred on destinations such as Aldeburgh, Thorpeness and Snape Maltings. These circumstances are therefore not directly comparable.</p> <p>The Applicant also argues that these comparator schemes are larger than the Proposed Project</p>
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			<p>benchmark for assessing the likely effects of the Proposed Project, which is expected to result in more limited impacts by comparison.</p> <p>The Applicant has reviewed the cited BVA research. As set out in Table 2.60 of Application Document 9.34.1 (B) Applicant's Detailed Responses to Relevant Representations identified by the ExA [REP2-014], the results from the BVA research indicate that the majority of respondents from the survey undertaken said the developments would make no difference to their likelihood of visiting.</p>	<p>and therefore represent a conservative benchmark. However, scale alone does not address the cumulative effects arising from multiple overlapping developments in the same area.</p> <p>With respect to the BVA research, the Applicant highlights that the majority of respondents stated that the developments would make no difference to their likelihood of visiting. However, the research also identified a proportion of visitors who indicated that they may be discouraged from returning. The potential implications of such responses for visitor behaviour and local tourism businesses are not evaluated in the Applicant's response.</p>
21	The Proposals and the Cumulative Threat	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	The Applicant stands by the responses previously provided on these matters, including within Table 30.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] , and Table 2.57 of Application	The Applicant refers to earlier responses in REP3-064 and REP2-014 and to the cumulative traffic assessment in APP-060 . However, these references do not address the specific issue raised by SEAS, which concerns the use of January–February traffic conditions as the baseline

		<p>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>	<p>Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014].</p> <p>A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink based on the worst-case assumption that construction peaks of these different schemes would fully overlap. The assessment concludes that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other developments.</p>	<p>for modelling in a highly seasonal tourism area.</p> <p>While APP-060 assumes that the construction peaks of major projects could overlap, the reliability of the cumulative traffic assessment still depends on the underlying baseline traffic data used in the modelling. SEAS has previously identified that seasonal traffic levels in the area increase significantly during the visitor season. The Applicant’s response does not explain why a winter baseline is appropriate in a location where traffic conditions are materially different during peak tourism periods.</p> <p>The reliance on standard NSIP methodology therefore does not address the question of whether the modelling baseline adequately reflects the conditions experienced on the local road network during periods of highest visitor activity.</p>
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29	Consequences for Tourism and the Local Economy, and Recreation	<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>	<p>The Applicant has conducted a robust EIA and is confident in its conclusion that there will be no significant inter-project cumulative effects on socio-economic, recreation and tourism receptors, including social infrastructure. The Applicant notes there are concerns regarding the potential for adverse impacts on local accommodation. Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socioeconomics, Recreation and Tourism [REP1A-005] concludes that there are no significant effects anticipated on local accommodation capacity arising from the Suffolk Onshore Scheme. Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on local accommodation capacity. 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</p>	<p>The Applicant reiterates its conclusion that there will be no significant inter-project cumulative socio-economic effects, citing the accommodation assessment in REP1A-005 and the cumulative assessment in APP-060.</p> <p>However, the response does not address the specific mechanism of impact raised by SEAS (including in REP4-158), namely the potential displacement of tourism accommodation and pressure on the private rental sector arising from the combined workforce of multiple concurrent NSIPs.</p> <p>The Applicant refers to its further submission responding to AP104 (REP4-237). While this document provides additional analysis, it does not materially change the underlying conclusion. The analysis assumes that construction workers can be accommodated within a 60-minute drive-time area and aggregates</p>
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			<p>effects are expected. As a result, no additional mitigation will be required.</p> <p>The Applicant is working closely with Sizewell C and Scottish Power Renewables (SPR) to explore ways that the impacts of construction workers traveling to site and staying in the local area could be minimised. The Applicant has had several meetings with Sizewell C, discussing the shared use of the Park and Ride Facilities being built by Sizewell C, the buses that they are providing for workers from Ipswich Train Station and any future initiatives they are planning. The types of construction workers used for the Proposed Project are more likely to stay in hotels within cities and large towns where they have access to other facilities based on experience from other National Grid projects.</p> <p>It is likely that the securing of the above points could be in the form of commitments in the REAC, the details of which will be discussed with the local planning authorities.</p> <p>The Applicant has reviewed the assessment of local accommodation and checked</p>	<p>accommodation capacity across a very wide geography.</p> <p>Such an approach does not address the potential for localised effects in coastal settlements where tourism activity is concentrated, including Aldeburgh, Thorpeness and Southwold, which the Applicant itself recognises as locations where accommodation constraints could arise.</p> <p>The additional analysis also relies heavily on the availability of private rental accommodation, which represents the overwhelming majority of the accommodation capacity assumed in the assessment.</p> <p>The assessment applies national vacancy rates for the private rental sector and assumes that a proportion of this stock would be available for construction workers. However, the English Housing Survey data used for this purpose is national-level data and does not provide</p>
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			<p>specific data sources and is submitting a further response in the form of Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2 at Deadline 4A in relation to Action Point 104.</p>	<p>evidence of vacancy levels in the Suffolk coastal housing market.</p> <p>The response therefore does not demonstrate that the assumed rental availability reflects conditions in the local housing market.</p> <p>Independent review of the Applicant's accommodation assessment commissioned by East Suffolk Council has also identified inconsistencies in the accommodation data and a lack of transparency in the underlying datasets and assumptions (REP4-184).</p> <p>The Applicant also states that accommodation demand from the Proposed Project represents a relatively small proportion of cumulative demand and that the majority of accommodation pressure would arise from other schemes, particularly Sizewell C.</p> <p>However, the issue raised by SEAS concerns the combined effect of several concurrent infrastructure projects on the local economy and tourism</p>
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			<p>sector. The fact that accommodation demand is shared across multiple projects does not reduce the potential for cumulative displacement of tourism accommodation or pressure on local housing supply.</p> <p>Finally, the Applicant proposes monitoring where workers are staying and considering potential measures if constraints arise.</p> <p>While this commitment is noted, monitoring during construction does not substitute for a robust assessment of impacts prior to consent being granted. The reliance on post-consent monitoring indicates that the Applicant recognises the possibility of accommodation constraints, yet the assessment continues to conclude that no significant cumulative effects are anticipated.</p> <p>In summary, the Applicant's additional submission REP4-237 was requested by ExA to clarify the worst-case level of accommodation demand arising</p>
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				<p>from cumulative construction workforces. It does not address the core issue raised by SEAS. The analysis aggregates accommodation capacity across a large study area, relies on national rental vacancy assumptions rather than local market data, and does not evaluate the potential displacement of tourism accommodation or pressure on the coastal housing market arising from cumulative construction workforces. The basis for concluding that there will be no significant cumulative socio-economic effects therefore remains unsubstantiated.</p>
36-38	Conclusions	<p>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.</p>	<p>The Applicant has conducted a full assessment of socio-economics, recreation and tourism effects submitted as part of the EIA in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]. The assessment methodology adopted by the Applicant is consistent with the approach adopted by comparable</p>	<p>The Applicant states that a full assessment of socio-economic, recreation and tourism effects has been undertaken within REP1A-005 and that the methodology adopted is consistent with comparable NSIPs. However, the concern raised by SEAS is not whether an assessment has been undertaken, but whether the assumptions and methodology</p>

			<p>NSIPs. Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065] has been produced to support the assessment of visitor and tourism impacts associated with the Proposed Project and in response to concerns raised regarding potential adverse effects on visitor numbers, spending, and perception.</p>	<p>used remain appropriate in light of issues raised during the Examination.</p> <p>As recorded in previous SEAS submissions, including the ISH2 Written Representation (REP4-158), a number of aspects of the Applicant’s assessment have been questioned during the Examination. The Examining Authority has subsequently sought further clarification on accommodation impacts through Action Point 104 (EV6-033), to which the Applicant responded in REP4-237, and has also requested additional information on accommodation capacity and cumulative demand through ExQ2 (PD-021).</p> <p>The Applicant refers to the Visitor and Tourism Assessment Technical Note (REP3-065). However, that document largely reviews experience from other NSIPs and reiterates the conclusions of the Environmental Statement rather than revisiting the underlying assumptions of the assessment for the Proposed Project. The</p>
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				continued reliance on the original assessment and methodology, without substantive revision in light of issues raised during the Examination, means that the adequacy of the Applicant's conclusions on tourism and socio-economic impacts remains in question.
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