

FIONA GILMORE FOR SEAS - OFH3 ORAL TESTOMONY

At Deadline 5, the Applicant has provided some further material on accommodation monitoring, particularly in **REP5-135** and **REP5-136**, but it has not produced any updated tourism assessment or broader reassessment of tourism effects. The position continues to rely on the original Environmental Statement assessment (**REP1A-005**) and earlier submissions, including accommodation material at Deadline 4 (**REP4-237**). This is particularly important given the economic significance and sensitivity of the Suffolk coastal tourism economy, which is highly dependent on landscape quality and visitor perception.

The updated REAC (**REP5-115**) does not introduce new evidence or a revised assessment. Instead, it introduces process-based commitments — primarily liaison with tourism bodies and monitoring of worker accommodation.

Those commitments are limited. They do not secure mitigation outcomes, they do not prevent displacement of tourism accommodation, and they rely on the Applicant only *considering* action if certain thresholds are reached. These commitments are not secured at the point of consent, but are deferred to outline management plans that are approved and developed post-consent.

As a result, the position at Deadline 5 is essentially unchanged: impacts are being monitored rather than prevented, and the key concerns raised by SEAS and others - particularly around accommodation pressure and effects on the tourism economy - remain unresolved.

Against that background, I will address the two specific agenda items.

5.1 Accommodation for workers

Turning to accommodation, the Applicant's position remains limited to monitoring and the potential to "consider" action. It does not provide any mechanism that would prevent displacement of local residents or the use of tourism accommodation.

The Applicant has not secured a robust or enforceable accommodation strategy within the DCO.

The updated REAC (**REP5-115**) introduces monitoring of worker accommodation; however, this is inherently reactive. It requires the Applicant only to consider measures if a threshold is exceeded, and does not place any restriction on the use of tourism or private rental accommodation.

Indeed, Appendix E to **REP5-136** makes clear that SE05 is regarded by the Applicant as additional reassurance rather than essential mitigation, which underlines the limited status of this measure.

The Outline Onshore CEMP (**AS-127** – Application Document 7.5.3(B)), secured through Requirement 6, does not remedy this. It contains no provisions that control where workers are housed, and instead relies on high-level management principles and future plan development.

As confirmed within AS-127, the CEMP is a framework document that will be finalised post-consent and updated as a “live” document during construction, meaning that mitigation is not fixed or secured at the point of decision.

Accordingly, there is no secured or effective mechanism to prevent pressure on the local housing and tourism market.

Given the cumulative workforce across multiple NSIPs, and concerns raised by local authorities (**REP4-184**), accommodation impacts remain materially unmitigated.

5.2 Tourism impact monitoring and mitigation

Turning to tourism, the approach remains process-based rather than evidence-based, and does not provide confidence that impacts on this particularly sensitive coastal tourism economy will be avoided.

As with accommodation, reliance is placed on outline management plans secured through Requirement 6, which are framework documents finalised post-consent and do not secure defined mitigation outcomes.

The REAC commitment (SE04 in **REP5-115**) provides for liaison with tourism businesses but does not secure any specific mitigation or outcome.

There is no requirement for visitor perception monitoring, no defined tourism indicators, and no trigger-based mitigation framework. That is now explicit in REP5-135. In response to ExQ2 2SERT4 (**PD-021**), the Applicant says it is not willing to commit to broader tourism monitoring beyond worker and tourist accommodation, and that worker accommodation is the only area where monitoring and management would provide a meaningful commitment.

This is despite the sensitivity of the Suffolk coastal tourism economy and the issues raised in previous SEAS submissions (**REP3-139**). Evidence presented during the Examination indicates that even modest changes in visitor perception over a prolonged construction period could result in substantial economic effects. In a tourism economy as place-dependent as the Suffolk coast, reliance on limited liaison and accommodation monitoring cannot be regarded as adequate mitigation.

Evidence presented in SEAS submissions, drawing on DMO research, indicates that a sustained reduction in visitor numbers over the construction period could result in very substantial economic loss to the local area (in the order of c.£0.5bn over the construction period, based on DMO evidence referenced in SEAS submissions). The scale, duration and cumulative nature of construction across multiple NSIPs means that such effects are not short-term or localised, but structural and prolonged in nature. In these circumstances, process-based commitments to monitoring and liaison cannot realistically address fundamental changes to landscape character or destination perception.

The Aldeburgh–Snape area functions as a recognised tourism destination with a distinct identity built over decades. That identity is inherently sensitive to cumulative change and cannot readily be restored once degraded, reinforcing the need for a precautionary and evidence-based approach.

In these circumstances, and in the absence of robust, location-specific evidence, it is not appropriate to assume that significant adverse tourism effects will not arise. Given the scale, duration and sensitivity of the receiving environment, there is a realistic prospect of significant adverse effects which must be taken into account in decision-making.

Monitoring alone cannot substitute for a robust, location-specific assessment and secured mitigation. Impacts are monitored rather than prevented, and mitigation is not secured at the point of decision.

Thank you.