



SEAS D6 RESPONSE to APPLICANTS's SUBMISSIONS
SINCE D5, ISH3, Action Points and ExQ3
SOCIO-ECONOMICS and TOURISM

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Introduction and Overview

1. This submission addresses the continued deficiencies in the Applicant's assessment of socio-economics, recreation and tourism, having regard to its Deadline 5 submissions, ISH3, the associated Action Points and ExQ3.
2. This submission should therefore be read as:
 - a. identifying where the Applicant's Deadline 5 submissions do not resolve previously raised concerns; and
 - b. demonstrating how those same issues remain live, as reflected in the ISH3 Action Points and ExQ3
3. The context for these considerations remains that, the Suffolk coastal tourism economy is highly place-dependent and economically significant, with local authority and DMO evidence indicating substantial sensitivity to changes in landscape character, tranquillity and destination image, and evidence presented in earlier SEAS submissions indicating the potential for substantial economic loss over the construction period (c.£0.5bn) if these qualities are affected.
4. At Deadline 5, the Applicant has not materially updated its tourism assessment. The additional material provided — including REP5-135, REP5-136 and the updated REAC (REP5-115) — relates primarily to monitoring and management proposals rather than any revised or location-specific assessment of tourism effects.
5. In practice, the Applicant's position at Deadline 5 continues to rely primarily on:
 - a. the original Environmental Statement assessment of socio-economics, recreation and tourism (Application Document 6.2.2.10, REP1A-005);
 - b. the Applicant's tourism technical note and related submissions responding to earlier SEAS concerns;
 - c. the accommodation assessment and commentary provided at Deadline 4 (including REP4-237);
 - d. the Applicant's response to ExQ2 (PD-021) and supporting appendices at REP5-135 and REP5-136, which provide further justification and clarification of monitoring assumptions, but do not introduce any updated or location-specific tourism assessment; and

- e. general commitments to future monitoring and liaison, through outline management plans to be approved post-consent, rather than secured mitigation.
6. The main substantive new material relevant to tourism and accommodation at Deadline 5 is the updated REAC (REP5-115), together with the Applicant's responses to ExQ2 and supporting appendices at REP5-135 and REP5-136.
7. These introduce limited additional commitments, notably SE04 (liaison with tourism businesses via the DMO/LVEP) and SE05 (monitoring of worker accommodation use), and provide further explanation of the Applicant's approach to accommodation monitoring. However, they do not constitute an updated tourism assessment or a broader reassessment of tourism effects.

Approach to submissions since ISH3:

8. Since ISH3, the Action Points and ExQ3, the Examination has now explicitly identified the need for further evidence in these areas. However, the Applicant has not provided:
 - a. behavioural or market-based modelling;
 - b. price or affordability analysis;
 - c. tourism demand sensitivity testing; or
 - d. cumulative scenario modelling.
9. In the absence of such evidence, the assessment remains incomplete and does not provide a reliable basis for determining effects.
10. In these circumstances, and consistent with the need for a robust assessment under the EIA framework, it is not appropriate to assume that effects will be negligible in the absence of evidence. Where key aspects of impact are uncertain or unassessed, a precautionary approach is required.
11. On that basis, the potential for significant adverse effects on tourism and socio-economic receptors cannot be excluded and must be treated as a realistic and material outcome in the assessment.

Accommodation and Workforce Effects

No secured accommodation strategy

12. The Applicant has not secured a robust or enforceable accommodation strategy within the DCO.
13. The REAC (REP5-115) and Outline Onshore CEMP (AS-127 – Application Document 7.5.3(B)), secured through Requirement 6, do not provide any mechanism that controls where workers are housed or prevents the use of tourism or private rental accommodation.
14. 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.

Mitigation is therefore not fixed or secured at the point of decision.

15. Accordingly, there is no secured or effective mechanism to prevent pressure on the local housing and tourism market.
16. Given the cumulative workforce across multiple NSIPs, and concerns raised by local authorities (REP4-184), accommodation impacts remain materially unmitigated.
17. There is also a risk that sustained pressure on accommodation markets could have consequential effects on tourism-dependent businesses, particularly small and medium-sized enterprises operating in peak-season locations. This has not been assessed in terms of business viability or longer-term economic effects.

SE05 is reactive and does not prevent impact

18. SE05 (REP5-115) does not prevent tourism displacement. It relies on monitoring and only requires the Applicant to consider measures if a threshold is exceeded.
19. There is no binding requirement to act and no defined mitigation measures are secured.
20. Appendix E of REP5-136 makes clear that SE05 is regarded by the Applicant as additional reassurance rather than primary mitigation. This confirms that it is not a secured strategy for avoiding effects, but a limited monitoring response.

Trigger mechanisms do not capture peak or cumulative effects

21. The monitoring trigger within SE05 is limited in both scope and geography. It is focused on hotel and B&B accommodation within a defined distance of Aldeburgh and does not capture:
 - a. wider displacement into self-catering accommodation or private rental markets;
 - b. peak seasonal tourism demand; or
 - c. cumulative demand arising from multiple concurrent projects.
22. This is inconsistent with concerns raised in SEAS submissions (REP3-139) and local authority evidence (REP4-184), which highlight broader market pressures.
23. The absence of a trigger framework aligned to peak and cumulative conditions means that the mechanism may not detect the most significant impacts.

Tourism Assessment and Baseline

24. The Applicant has not provided any updated, location-specific tourism assessment at Deadline 5.

25. REP5-135 and REP5-136 provide further explanation of monitoring assumptions but do not revise the underlying tourism assessment in REP1A-005.
26. The approach therefore continues to rely on earlier baseline assumptions, without assessment of:
- a. visitor perception;
 - b. destination image;
 - c. behavioural responses; or
 - d. peak seasonal conditions.
27. Commitments are secured through outline management plans (AS-127) to be approved post-consent. These provide monitoring proposals but do not constitute an updated assessment or resolve underlying concerns raised in SEAS submissions (including REP3-139).
28. In response to ExQ2 2SERT4 (PD-021), the Applicant confirms that it does not consider it appropriate to commit to broader tourism monitoring beyond accommodation. This confirms that no wider framework for understanding tourism demand or behaviour is proposed.
29. In a tourism economy such as the Suffolk coast, where visitor behaviour is closely linked to landscape, tranquillity and destination perception, the absence of such assessment represents a material gap in the evidence base.
30. In the absence of evidence on visitor behaviour and destination sensitivity, it is not appropriate to assume that tourism demand will not be significantly affected, and the potential for significant adverse effects cannot be excluded.
31. There is also no assessment of how transport conditions and accessibility may influence tourism behaviour, despite evidence that congestion and journey reliability are key determinants of visitor choice in coastal destinations.

Cumulative Effects on Tourism and Socio-Economics

32. The Applicant has not provided a cumulative assessment of tourism effects that reflects concurrent construction activity across multiple NSIPs.
33. The assessment does not include:
- a. a combined construction programme;
 - b. an assessment of peak overlap scenarios; or
 - c. a cumulative assessment of accommodation demand and tourism displacement.
34. As a result, cumulative effects remain unquantified.
35. Given the scale, duration and overlap of construction activity across projects, effects are likely to be experienced as combined and prolonged pressures on the same tourism economy and accommodation market.
36. Unlike Sizewell C, which is geographically concentrated, the Proposed Development contributes to a pattern of distributed impacts across multiple

settlements and sensitive locations, including coastal communities and key tourism corridors. These distributed effects have not been assessed as a coherent tourism or socio-economic impact.

37. The cumulative presence of multiple cable routes, substations and associated infrastructure results in a materially different scale and character of impact than any single project assessed in isolation.
38. The Examining Authority's Action Points and ExQ3 reinforce the need to understand these combined effects. However, no additional cumulative assessment has been provided.
39. The scale and duration of overlapping construction activity also raises the prospect of sustained disruption to tourism-dependent businesses. These effects have not been assessed as structural or long-term economic impacts.
40. In the absence of a cumulative assessment that reflects concurrent construction activity and combined pressures, it is not possible to conclude that effects will be limited or negligible.
41. Applying a precautionary approach, the combination of scale, duration and geographic spread indicates a realistic potential for significant adverse cumulative effects on the tourism economy.

Reliance on Process and Lack of Secured Outcomes

42. The Applicant's Deadline 5 position is characterised by reliance on process-based, post-consent controls rather than updated assessment or secured mitigation.
43. REP5-135 and REP5-136 provide clarification of monitoring approaches but do not introduce new evidence.
44. The REAC (REP5-115) secures liaison (SE04) and monitoring (SE05), but does not secure any enforceable outcomes or control over construction activity.
45. There is no requirement to:
 - a. modify construction phasing;
 - b. implement seasonal restrictions; or
 - c. reduce impacts in response to tourism effects.
46. Commitments are framed as "seeking to minimise" impacts rather than securing defined outcomes.
47. There is also no secured governance structure ensuring that relevant local authorities are formally involved in tourism monitoring, data sharing or mitigation design.
48. As a result, impacts are not controlled at the point of consent but deferred to post-consent processes.

49. The scale and duration of potential impacts raises questions as to whether the current approach to mitigation is proportionate, and whether additional mechanisms may be required to address potential economic effects on tourism-dependent businesses.
50. This may include consideration of whether a more structured mitigation approach, for example a tourism-related compensation or support mechanism, is required.

Monitoring and Evidence Gaps

51. The Applicant has not provided a robust tourism monitoring framework. SE04 provides for liaison but does not constitute a monitoring strategy. It does not include:
- a. visitor surveys;
 - b. business impact monitoring;
 - c. destination perception analysis; or
 - d. defined indicators or thresholds.
52. This is confirmed in REP5-135, where the Applicant states that broader tourism monitoring is not proposed.
53. In contrast, local authority evidence and SEAS submissions (REP3-139) indicate that tourism impacts are closely linked to visitor perception and behaviour.
54. In the absence of a robust monitoring framework, there is no mechanism to detect or respond to wider tourism effects.
55. There is also no integration of tourism monitoring with transport or accessibility data, despite the relevance of traffic conditions to visitor behaviour and destination attractiveness.

Conclusion

56. In these circumstances, and in the absence of robust, location-specific and cumulative evidence, it is not appropriate to assume that effects will be negligible.
57. Applying a precautionary approach, there is a realistic prospect of significant adverse tourism and socio-economic effects.
58. 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.
59. Monitoring alone cannot substitute for a robust assessment and secured mitigation. Impacts are monitored rather than prevented, and mitigation is not secured at the point of decision.

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