



**SEAS DEADLINE 7 RESPONSE TO APPLICANT'S DEADLINE
6 SUBMISSIONS AND RELATED EXAMINATION MATERIAL.**

SOCIO-ECONOMICS and TOURISM

PINS Ref: EN020026
DEADLINE 7: 29 APRIL, 2026

SEAS IP: [REDACTED]
Date: 29 APRIL, 2026

Introduction and Scope

1. This submission is made by Suffolk Energy Action Solutions (SEAS) in respect of tourism and socio-economic effects.
2. SEAS relies on its previous submissions including its Deadline 6 Tourism submission (REP6-256E).
3. This submission:
 - a. identifies matters which remain unresolved following the Applicant's Deadline 6 submissions;
 - b. considers the Applicant's responses to ExQ3 (REP6-111) and related documents;
 - c. considers the draft Development Consent Order (dDCO) (REP6-004) and the Examining Authority's (ExA's) Schedule of Changes to dDCO (EN020026-003324); and
 - d. takes into account the Examining Authority's Rule 17 request for further information dated 21 April 2026; and
 - e. reflects the position at the close of the Examination.

Overview: Position at Close of Examination

4. The Applicant's Deadline 6 submissions do not materially alter the position previously identified by SEAS.
5. In particular, the Examination concludes without:
 - a. any updated location-specific tourism assessment;
 - b. any behavioural or demand-based analysis of tourism impacts;
 - c. any cumulative assessment of tourism effects across multiple projects;
or
 - d. any secured mitigation capable of controlling or preventing such effects.

6. These matters have been the subject of:
 - a. repeated submissions by SEAS;
 - b. questions from the ExA (PD-021 and PD-023); and
 - c. discussion at ISH3 and associated Action Points (EV6-033).
7. Notwithstanding those opportunities, the Applicant has not provided the required evidence, and its responses to ExQ3 and ISH3 Action Points (REP6-111 and related submissions) do not materially address or resolve these issues.
8. The Examining Authority's Rule 17 letter of 21 April 2026 further confirms that key matters remain unresolved at the close of Examination, including in relation to tourism assessment, accommodation, mitigation, monitoring and cumulative effects.

Tourism Assessment Remains Incomplete

9. The Applicant has still not provided a location-specific or behaviourally informed assessment of tourism effects.
10. The Applicant's responses to ExQ3 (REP6-111) do not introduce any new assessment methodology, modelling or evidence, and no updated tourism assessment has been provided to replace or materially revise the Environmental Statement assessment (REP1A-005).
11. This position remains unchanged following the Applicant's Deadline 6 submissions and is reflected in the Examining Authority's request for further clarification on tourism monitoring and the evidential basis for assessment (Rule 17 letter, section 9.1).
12. In these circumstances, it is not possible to conclude that tourism demand will remain unaffected or that effects will be negligible.
13. Recent reports of local visitor experience and business activity indicate that effects on tourism receptors are already apparent during early-stage Sizewell C works. For example, visitors to RSPB Minsmere have reported construction noise affecting the tranquillity of the reserve, and local tourism and hospitality businesses have identified disruption and significant loss of revenue associated with construction activity and traffic conditions (see Appendix A).
14. While such evidence is anecdotal, it is consistent with the types of effects identified in SEAS' previous submissions and reinforces the need for a precautionary approach in the absence of robust assessment.

Accommodation and Workforce Effects Remain Unresolved

13. The Applicant continues to rely on outline documents and management plans, including the REAC (REP6-134) and Outline Onshore CEMP (REP6-074).

14. These documents are expressly described as outline and subject to post-consent refinement and updating during construction.
15. Accordingly, the approach to accommodation and workforce impacts is not fixed at the point of decision and is dependent on future contractor-led development.
16. No secured accommodation strategy is provided within the DCO or supporting documents.
17. The REAC provisions (including SE05) continue to rely on monitoring and discretionary response, without:
 - a. binding requirements to act;
 - b. defined mitigation measures; or
 - c. mechanisms to prevent displacement of tourism accommodation.
18. The Applicant has not provided any assessment of accommodation affordability, displacement into the private rental sector, or effects on tourism-dependent businesses.
19. These issues remain unresolved and are reflected in the Examining Authority's request for the Applicant to respond to proposals for an Accommodation Strategy and Monitoring Plan (Rule 17 letter, section 9.3).

Cumulative Effects Remain Unassessed

20. The Applicant has not provided any inter-project cumulative tourism assessment reflecting:
 - a. concurrent construction activity across multiple NSIPs;
 - b. peak overlap scenarios; or
 - c. combined effects on the same tourism economy.
21. Transport conditions (including congestion and journey reliability) are a key determinant of visitor behaviour and destination choice in coastal tourism economies.
22. No traffic material submitted to date, including the Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk (REP6-096) and the Construction Traffic Management Plan (REP6-062), assesses how congestion, journey reliability or network performance may influence:
 - a. visitor behaviour;
 - b. destination choice; or
 - c. tourism demand.
23. Accordingly, intra-project cumulative effects arising from the interaction between tourism and traffic conditions remain unassessed.
24. More broadly, the Applicant continues to address cumulative effects within individual environmental topics and has not provided a single, integrated assessment across receptors, geography and time.

25. These issues remain unresolved and are reflected in the Examining Authority's request for further justification as to whether the mitigation hierarchy has been satisfied in respect of cumulative impacts (Rule 17 letter, section 16).

Mitigation Remains Process-Based and Unsecured

26. The Applicant's approach continues to rely on:
- a. outline plans (including the CEMP and CTMTP);
 - b. the REAC; and
 - c. post-consent approval processes under the DCO.
27. These mechanisms do not secure defined outcomes, do not control construction activity in relation to tourism impacts, and do not provide enforceable mitigation.
28. The Applicant's ExQ3 responses (REP6-111) confirm continued reliance on the mitigation hierarchy but do not demonstrate how residual impacts on tourism have been avoided, reduced or mitigated.
29. These deficiencies are not addressed by the provisions of the draft DCO (REP6-004), which continue to rely on outline plans and post-consent approvals rather than securing defined tourism-related outcomes.
30. Monitoring and liaison are relied upon in place of mitigation and do not prevent impacts or address uncertainty in advance of construction.
31. These issues remain unresolved and are reflected in the Examining Authority's request for additional tourism mitigation commitments and explanation as to why such measures have not been secured (Rule 17 letter, section 9.2).
32. The ExA has also required the Applicant to respond to proposed revisions to core construction working hours (Rule 17 letter, section 10.1), further demonstrating that key parameters governing construction impacts remain unsettled at the close of Examination.

Monitoring Does Not Resolve Uncertainty

33. The Applicant has not provided a robust tourism monitoring framework.
34. There is no defined set of tourism indicators, baseline against which change is measured, trigger mechanism linked to tourism effects, or secured response to identified impacts.
35. The reliance on monitoring is therefore insufficient to address the absence of assessment.
36. As noted by Suffolk County Council (REP6-276), where the evidence base is limited and conclusions cannot be drawn with certainty, there is a likelihood

that effects may be greater than anticipated.

37. Monitoring cannot substitute for a robust assessment and does not address uncertainty prior to construction.
38. This issue remains unresolved and is reflected in the Examining Authority's request for further clarification on the value and feasibility of tourism monitoring (Rule 17 letter, section 9.1).

Precautionary Approach

39. The absence of evidence identified above persists despite repeated submissions, ExA questions, and opportunities to provide such evidence.
40. In these circumstances, it is not appropriate to assume that effects will be negligible.
41. Applying a precautionary approach, the potential for significant adverse effects on tourism and associated socio-economic receptors cannot be excluded.


Conclusions

42. The Examination concludes without the Applicant having provided:
 - a. a robust, location-specific tourism assessment;
 - b. a cumulative assessment of tourism effects; or
 - c. secured mitigation capable of addressing those effects.
43. The issues identified by SEAS throughout the Examination therefore remain unresolved.
44. In several respects, including the absence of behavioural evidence, reliance on post-consent processes, and lack of secured mitigation, those concerns have been reinforced by the Applicant's Deadline 6 submissions and by the positions of other parties.
45. In these circumstances, the Applicant has not demonstrated that significant adverse effects on tourism and the local economy will not occur or can be effectively mitigated.
46. These unresolved deficiencies and risks of significant adverse effects must therefore be given material weight in decision-making.


end

Appendix A


'RSPB Minsmere visitors concerned about Sizewell C noise'
East Anglian Daily Times - 14 April 2026




'Sizewell roadworks cost us thousands, say pubs'
BBC - 21 April 2026



'Caravan owners say site is 'cashing in' on Sizewell'
BBC - 9 March 2026



'Two Magpies Bakery hits out at Sizewell C works on A12'
BBC - 27 March 2026



'Shop owner's relief after new roundabout completed'
BBC – 30 March 2026

