The London Resort Development Consent Order

BC080001

Environmental Statement
Volume 2: Appendices

Appendix 7.8 – Construction Workforce Accommodation Strategy

Document reference: 6.2.7.8
Revision: 00

December 2020

Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
Regulation 5(2)(a)
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Regulation 12(1)

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Revisions

Revision	Description	Issued by	Date	Approved by
00	Issue for DCO Submission	EB/EE	24/12/2020	VOL/LRCH

Volterra Partners Ltd
56-58 Putney High Street
Putney
London
SW15 1SF

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Executive Summary

London Resort Company Holdings Limited (the Applicant) is proposing to develop a world-class, sustainable, next generation entertainment resort known as the 'London Resort', on the banks of the River Thames. The focus of the London Resort will be a Leisure Core, comprising a range of events spaces, themed rides and attractions, entertainment venues, theatres and cinemas, developed in landscaped settings in two phases known as Gate One and Gate Two.

The construction of the London Resort will require a large workforce; up to 5,000 construction workers are expected on-site in the peak year of Gate One construction (2023) and up to 1,700 in the peak year of Gate Two (2028). The Applicant would seek to maximise local recruitment of the workforce, as set out in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7). Of these, however, up to half are expected to live too far from the site to commute daily and will seek temporary accommodation close to the site. The aim of this strategy is to ensure that the additional demand generated by these non-home based workers will not place excessive pressure on existing accommodation markets.

The strategy first assesses the existing accommodation stock within the area local to the site, defined as the Core Study Area (CSA) (Dartford, Gravesham and Thurrock). It uses a variety of sources to estimate the total room stock across tourism accommodation (serviced, non-serviced[1] and campsites), the private rented sector (PRS) and the owner-occupied sector (OOS). The availability of the different types of accommodation stock in the area is then considered, based on occupancy rates in the tourism accommodation sector and vacancy rates in the private housing sector. Construction workers are usually subject to a constrained budget when it comes to paying for temporary accommodation, which is also taken into consideration in determining the likely overall stock estimates.

Overall, the accommodation stock baseline finds that whilst there are 3,000 rooms in the tourism accommodation sector in the CSA, only 75 of which are expected to be available and affordable for construction workers at any one time throughout the year. There are an estimated 57,400 rooms in the PRS, 4,600 of which are expected to be available and affordable. There are 108,000 rooms in the OOS, 700 of which are expected to be available and affordable. This provides a total of 5,400 available and affordable rooms in the CSA, but with a very high (86%) reliance upon the PRS.

In the years to 2023 and 2028, it is highly likely that there will be growth in the existing stock. However, this is dependent upon a number of unknowns. Firstly, there are hotels in the planning pipeline which may or may not come forward in the short term given the wider economic climate. If the Development Consent Order (DCO) application is accepted, this will increase the tourism offering in the area, likely incentivising hotel developers to direct investment to the nearby area that might not otherwise be realised (similarly individuals might convert homes to holiday/room

[1] Conservatively assumed to include all latent accommodation such as spare rooms or other accommodation that are not currently rented out, but which could be and which could generate income for local households

lettings), although the timing of any such investments is unknown at this time. The impact of the COVID-19 pandemic has brought about wide uncertainties both in terms of existing and future stock. In the absence of more information about stock growth being available, this report has conservatively assessed the impact in 2023 and 2028 against existing stock levels.

Comparing the peak workforce requiring temporary accommodation (2,500 in 2023 and 850 in 2028) with the available and affordable rooms in the CSA (5,400), it is clear that the local market is highly constrained. The workforce would be highly dependent upon the PRS, which offers the vast majority (86%) of these rooms. Without this sector, demand would far outweigh spare supply of accommodation. The strategy also finds that up to 630 construction workers at cumulative schemes in the area might also be requiring temporary accommodation in 2023 and 210 in 2028, placing further pressure on the local market. Given this, it is strongly advised that the London Resort provide on-site accommodation which will mitigate the negative impacts of the additional demand on the local accommodation markets.

This strategy is underpinned by stakeholder engagement. Local authorities agreed with the conclusion that the local accommodation markets are constrained and that an influx of workers with temporary accommodation requirements would place increased pressure on an already tight market, particularly within the PRS. Engagement with tourism bodies also identified that whilst there is considerable accommodation stock across Kent, the CSA does not have a large offering at the moment. There is a pipeline of stock coming forward across the wider area, but considerable uncertainty currently exists about the viability of existing stock as well as the deliverability of future stock due to COVID-19. As such, for the temporary issues of accommodating construction workers, on-site temporary provision is broadly supported by the feedback received from stakeholders.

The report outlines three preliminary options for the London Resort strategy: rely on existing accommodation options; purchase or rent a decommissioned cruise ship (likely with 1,000 to 2,000 room capacity); and/or locate mobile homes (500 – 700 rooms) on-site. The strategy discusses the various advantages and disadvantages of each option. Overall, it is concluded that the Applicant will provide a combination of options, with the cruise ship and on-site mobile homes providing substantial relief for the local market. These options fully mitigate the impact of the non-home based workforce in 2023 and 2028. As such, the potential cumulative impact of Gate Two peak workforce and Gate One visitors is not considered in this strategy. The impact of visitors on accommodation options is considered and assessed in Chapter 7: *Land use and socio-economics* (document reference 6.1.7).

Finally, the approach to management and monitoring is discussed, including an accommodation matching service (either through key appointed personnel or an online hub) to provide a one-stop-shop that accommodation providers can list their offer on, and ensures that workers can select accommodation best suited to their needs. The take-up of various accommodation will be monitored, identifying any issues or problems as soon as possible. High standards of behaviour will be enforced through the Workforce Code of Conduct.

This strategy is based on a number of conservative assumptions, such as a high proportion of workers requiring on-site accommodation and assuming peak occupancy in the tourism accommodation sector applies year round, despite high seasonable variability. Such conservative assumptions are applied so as to present a worst case scenario, allowing for more meaningful planning and minimising the risk of negative outcomes being realised.

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Chapter One ◆ Introduction

THE LONDON RESORT

1.1. The London Resort will be a nationally significant visitor attraction and leisure resort, built largely on brownfield land at Swanscombe Peninsula in Kent on the south bank of the River Thames and with supporting transport and visitor reception facilities on the northern side of the river in Essex.

1.2. A detailed description of the London Resort is provided in Chapter 3: *Project Description* (document reference 6.1.3). The focus of the Resort will be a 'Leisure Core' containing a range of events spaces, themed rides and attractions, entertainment venues, theatres and cinemas, developed in landscaped settings in two phases known as Gate One and Gate Two ('the Gates'). Outside the Gates will be a range of ancillary retail, dining and entertainment facilities in an area known as the Market.

1.3. The Resort will also include hotels, a water park connected to one of the hotels, a conference and convention centre known as a 'conferention centre', a Coliseum (capable of hosting e-Sports events), creative spaces, a transport interchange including car parking, 'back of house' service buildings, an energy centre, a wastewater treatment works and utilities required to operate the Resort. Related housing is also proposed to accommodate some of the Resort's employees.

1.4. Substantial improvements are proposed to transport infrastructure. This will include a new direct road connection from the A2(T) and a dedicated transport link between Ebbsfleet International Station, the Resort and a passenger ferry terminal beyond. The ferry terminal would serve visitors arriving by ferry on the River Thames from central London and Tilbury. A coach station is also proposed. On the northern side of the Thames to the east of the Port of Tilbury, additional coach and car parking and a passenger ferry terminal are proposed to serve the Resort.

1.5. The London Resort would involve an extensive restoration of land used in the past for mineral extraction, waste disposal and industrial activities including cement and paper production, with a comprehensive landscape strategy proposed incorporating the retention and enhancement of wildlife habitats.

THE CONSTRUCTION WORKFORCE ACCOMMODATION STRATEGY

1.6. The construction of the London Resort is expected to require a significant number of workers. The Applicant would seek to maximise local recruitment of the workforce, as set out in Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7). However, not all of these workers will reside within a reasonable daily commuting distance from the site. Those workers that live further afield will therefore require some form of temporary accommodation in the area close to the site. For the purposes of this strategy, it has been assumed that most workers requiring temporary accommodation will seek accommodation options within the Core Study Area (CSA), comprised of the local authorities of Dartford, Gravesham and Thurrock.

1.7. To meet their temporary accommodation needs, workers would generally look to utilise the tourism accommodation sector (hotels, short stay holiday lets or campsites), the private rented sector (PRS) or the owner occupied sector (OOS).

1.8. However, it is possible that, given the large construction workforce required, the increased demand will put excessive pressure on these temporary accommodation markets, negatively impacting their ability to meet demand from their existing customer base (tourists, private renters, homeowners).

1.9. This strategy aims to ensure that the additional demand generated by the construction workers at the London Resort does not negatively impact these temporary accommodation markets.

1.10. To do this, the strategy first estimates the maximum number of London Resort construction workers that are likely to be seeking temporary accommodation and considers cumulative schemes which might also be placing additional demand on the local accommodation markets. Subsequently, the strategy reviews the accommodation market to understand the amount of available and affordable supply available to construction workers. This enables a clear comparison between the expected increase in demand and any ‘spare’ capacity available in the local market that could meet this demand. Upon finding that the likely increased demand far outweighs the spare capacity, the strategy outlines the potential ways in which the London Resort could look to mitigate the negative demand impacts by providing additional temporary accommodation supply to the market and promoting this to the workers.

1.11. This Construction Workforce Accommodation Strategy forms part of the planning application supporting the Development Consent Order application. It should be read alongside the following documents within the DCO application:

- Appendix 7.7: *Outline Employment and Skills Strategy* (document reference 6.2.7.7): the Applicant would seek to maximise local recruitment of the workforce, as set out in the Employment and Skills Strategy, so local people can benefit from the opportunities provided by the London Resort and to minimise the likely impact on the accommodation market;

- Chapter 7: *Land-use and socio-economics* (document reference 6.1.7): this sets out the likely significant effects associated with non-home based workers demand for accommodation. There will also be impacts upon the accommodation market once London Resort is operational. These impacts are not addressed in this report but are considered in Chapter 7 of the ES;

- Appendix 3.1: *Outline Construction Method Statement* (document reference 6.2.3.1): this sets out the indicative construction methodologies, works and procedures required for constructing the London Resort. It describes how it is anticipated the London Resort will be constructed and will set out the overall programme and phasing of works.

Chapter Two ◆ Construction Workforce

ESTIMATED CONSTRUCTION WORKFORCE SUPPORTED BY THE LONDON RESORT

2.1 The construction workforce has been estimated using an industry standard method of dividing the estimated construction cost by the average output of a construction worker in the area, and then sense checked by the London Resort construction team.

2.2 It is intended that Gate One will be built between 2022 and 2024 (a construction period of 2.5 years), and Gate Two built between 2026/7 and 2029 (a construction period of 3 years). Construction period phasing means that there will be a different number of construction workers on-site at any one time. It is expected that the maximum peak workforce will be in 2023 for Gate One and 2028 for Gate Two, as shown in Table 2.1. However, it is acknowledged that due to the scale of construction required and short timescales for construction, employment is expected to be at or near peak levels for a large part of the construction period.

2.3 The construction of both gates will require specialist and highly skilled contractors. The specialist elements (such as the themed rides and attractions) are expected to be largely manufactured offsite, but then delivered and assembled on-site by specialist workers. Table 2.1 splits the construction jobs estimates by the offsite and on-site elements, where the breakdowns relate to where the work would take place. For example, the rides' construction would be included in the offsite estimates, but its assembly would be included in the on-site estimates. Similarly, it is envisaged that modular construction methods would be utilised for 'pod' elements such as the production of hotel rooms, and on-site accommodation where the units would be predominantly constructed offsite and then brought to site for assembly.

2.4 The disaggregation of construction activities between different elements and between on-site and offsite elements is not yet fully known, so low and high scenarios are presented. The low scenario for the on-site workforce requirement aligns with the high scenario for offsite workforce and vice versa. The figures are therefore intended to capture estimates of the maximum numbers of jobs that would be required both on-site and offsite, at different points in time.

2.5 The construction of London Resort is estimated to support 23,300 job years over the course of the whole construction period (2022-2029), encompassing both gates. The construction of Gate One is expected to support 16,500 job years (average 6,600 per year), where, at peak, between 3,300 and 5,000 will be on-site and between 3,300 and 5,000 will be offsite. The construction of Gate Two is expected to support 6,800 job years (average 2,300 per year), where, at peak, between 1,100 and 1,700 will be on-site and between 1,100 and 1,700 will be offsite.

Table 2.1: On-site and offsite construction employment supported by the London Resort for Gates One and Two

		Gate One		Gate Two	
		Low	High	Low	High
On-site	Job years	6,600	9,900	2,700	4,100
	Average jobs per year	2,600	4,000	900	1,400
	Total peak	3,300	5,000	1,100	1,700
Offsite	Job years	9,900	6,600	4,100	2,700
	Average jobs per year	4,000	2,600	1,400	900
	Total peak	5,000	3,300	1,700	1,100
Total	Job years	16,500	16,500	6,800	6,800
	Average jobs per year	6,600	6,600	2,300	2,300
	Total peak	8,300	8,300	2,800	2,800

Note: one job year is defined as full time employment for one person for one year

NON-HOME BASED CONSTRUCTION WORKERS AND TEMPORARY ACCOMMODATION

The London Resort

2.6 According to the Construction Industry Training Board (CITB), in 2018/19, 5% of UK construction workers required temporary accommodation.[2] At the regional level, the figures were 7% of South East construction workers, 5% for East workers and 10% for London workers. These statistics are for the construction industry generally and are not available specific to largescale construction-sites and major infrastructure projects. Relevant to the London Resort construction are the following factors: (i) general likelihood of construction workers to be based away from home; (ii) geographical location of the construction and how this interacts with quantum and availability of construction workers; and (iii) the specialisms required (such as themed rides construction and assembly) and how that may impact upon nature of workforce. As a result of these complexities and the lack of available data, other DCOs have been reviewed.

- Heathrow Airport Ltd DCO conservatively doubled the London figure (from 10% to 20%) to reflect the major nature of the project, however this was challenged by the local authorities as likely under-estimating potential temporary accommodation requirements.
- Other specialised projects such as Wylfa,[3] Sizewell C,[4] and Hinkley Point C[5] estimated 77%, 75% and 66% of peak workers (respectively) would be non-home based.
- Other DCOs near to the London Resort, Tilbury2 and Manston Airport, did not give

[2] CITB Workforce Mobility and Skills Report, 2019
[3] Wylfa Newydd Project, 2016, Construction Workers Accommodation Strategy
[4] The Sizewell C Project, 2020, Accommodation Strategy
[5] EDF Energy, 2011, Hinkley Point C Draft Accommodation Strategy

detail over the proportion of non-home based workers.[6]

2.7 The proportion of non-home based workers is also driven by the accessibility of a site (and, as such, the proximity of a larger labour force pool). Given that the site is considerably more accessible than Wylfa (Anglesey, Wales), Sizewell C (edge of Suffolk) and Hinkley Point C (edge of Taunton), the proportion of non-home based workers for this project will likely be smaller than these schemes.

2.8 Considering the above benchmarks, it is estimated that between 25% and 50% of workers supported by the on-site budget would be non-home based and require some form of temporary accommodation, equating to up to 2,500 workers at Gate One peak and up to 850 at Gate Two peak. This means that 50%-75% would be home based, commuting from within 60-minutes. It is estimated that within this radius there are 361,000 residents employed in construction; Gate One would require 0.7%-1.0% of this workforce and Gate Two would require 0.2%-0.4%.

2.9 Despite the specialist aspects of the construction of the London Resort, this is expected to be a worst-case estimate of the likely number of non-home based workers due to the accessibility of the site and location near large labour markets, including a 17 minute Southeastern train to London St Pancras International every 30 minutes and future plans for ferry services into London Docklands, Greenwich and Central London.[7] It is therefore a conservative assessment of the impact on the accommodation market. The on-site workforce would be relatively small compared to future CSA population (estimated to be 409,000 in 2023).

Cumulative schemes

2.10 There are a number of schemes in the area which will require construction workforces at the same time as the London Resort. It is expected that at least some proportion of these workforces will also be non-home based and requiring some form of temporary accommodation. Additionally, Gate One will be operational in 2028, meaning that visitors could place additional demand on existing accommodation options. Paragraph 5.5 contains further discussion of this cumulative impact.

2.11 Table 2.2 presents the estimated demand for temporary accommodation from cumulative schemes in the area. Scheme specific information is used where possible. Only two schemes (Lower Thames Crossing and A2 Bean) provided information regarding their estimated non-home based workforce. For the other schemes, the CITB UK standard of 5% of peak[8] was conservatively doubled and then assumed to apply. Overall cumulative schemes in the area are expected to generate 630 workers in 2023 and 210 in 2028 which

[6] Neither of these two DCOs appear to have produced a Construction Workforce Accommodation Strategy nor provide detail regarding temporary accommodation they might be providing as part of the project. This may be due to the far smaller construction workforces expected: Manston Airport estimated an average of 210 workers on site each year (peak 630) and concluded that, given the majority would be home-based, there would be no significant adverse effect on local accommodation. Tilbury2 estimated a maximum of 226 construction full time equivalent workers over the 1 year construction period. Whilst this was considered a significant beneficial effect in terms of employment, no assessment of the effect of non-home based workers on local accommodation was made.

[7] Ebbsfleet Garden City, February 2020, Connecting people and places: DRAFT: A sustainable travel strategy to balance mobility in Ebbsfleet

[8] Where peak information was not available (for six schemes), the average on-site per year was factored by 1.5, which is an average ratio of peak:average from other projects.

might be requiring some form of temporary accommodation. Together with the London Resort, this becomes 3,100 peak workers in 2023 and 1,100 in 2028.

Table 2.2: Cumulative schemes workforces (for schemes with construction periods overlapping that of the London Resort) and conservative estimates of non-home based workers requiring temporary accommodation in 2023.

Scheme	Construction Period	Relevant London Resort Peaks	Application information regarding construction workforce and non-home based	Estimated annual workforce requirement (and description of conversion assumptions where required)	Estimated peak non-home based
Lower Thames Crossing	2021-2027	2023	900 (peak workforce), 125 non home based	900 (use peak in absence of more information)	125
Riverside Energy Park, by Cory Riverside Energy	2021-2024	2023	1,097 (peak workforce per month)	1,097 (use peak per month in absence of more information)	110
Eastern Quarry, Swanscombe by Barton Wilmore.	2007-2025	2023	1,150 (FTEs over whole period)	639 (Use standard assumption that 1 FTE = 10 job years to get total job years, then average for 18 year construction period)	96
A2 Bean and Ebbsfleet Junction Improvements by Highways England.	2020-2022 /3	2023	100 (peak workforce), 0 non home based	100 (use peak in absence of more information)	0
Stone Lodge Complex by BAM Construction.	2018-2023	2023	*	*	*
Northfleet Embankment, by Keepmoat Homes Ltd.	2017-2024	2023	143 (FTEs per month)	204 (Assume per month FTE = per year FTE. Use standard assumption that 1 FTE = 10 job years to get total job years, then average for 7 year construction period)	31
Land East Of Caspian Way	2018-2034	2023 2028	1,250 (workers per annum)	1,250	188
C.Ro Ports London Ltd Purfleet Thames Terminal	2017-2022	2023 (worst case)	*	*	*

Scheme	Construction Period	Relevant London Resort Peaks	Application information regarding construction workforce and non-home based	Estimated annual workforce requirement (and description of conversion assumptions where required)	Estimated peak non-home based
Thames Enterprise Park The Manorway Coryton Essex	2018-2031	2023 2028	201 (FTEs over whole period)	155 (Use standard assumption that 1 FTE = 10 job years to get total job years, then average for 13 year construction period)	23
Langdon Hills Golf And Country Club	2020-2023	2023	335 (job years per annum)	355	50
Outline application for a mixed development and comprising: up to 532 Homes, up to 46,000 sq. m Employment Floorspace and a Mixed Use Neighbourhood Centre	2017-2027	2023	1,600 (job years) with ‘high local’ proportion	80 (average per year over 10 years of construction)	12

*Planning Applications. Note * denotes missing data*

Chapter Three ◆ Accommodation Stock Baseline

INTRODUCTION

3.1 There may be several benefits of the non-home based construction workers staying in existing accommodation options. These could include: providing economic benefits to local accommodation providers and other businesses, filling spare capacity and improving the viability of local accommodation (particularly off peak), worker preference, and stimulating improvements in existing housing and tourist stock.

3.2 That said, the Applicant does recognise that there may be negative impacts on the sector, particularly where accommodation is at capacity. This section assesses the existing accommodation stock to understand the capacity of the accommodation market.

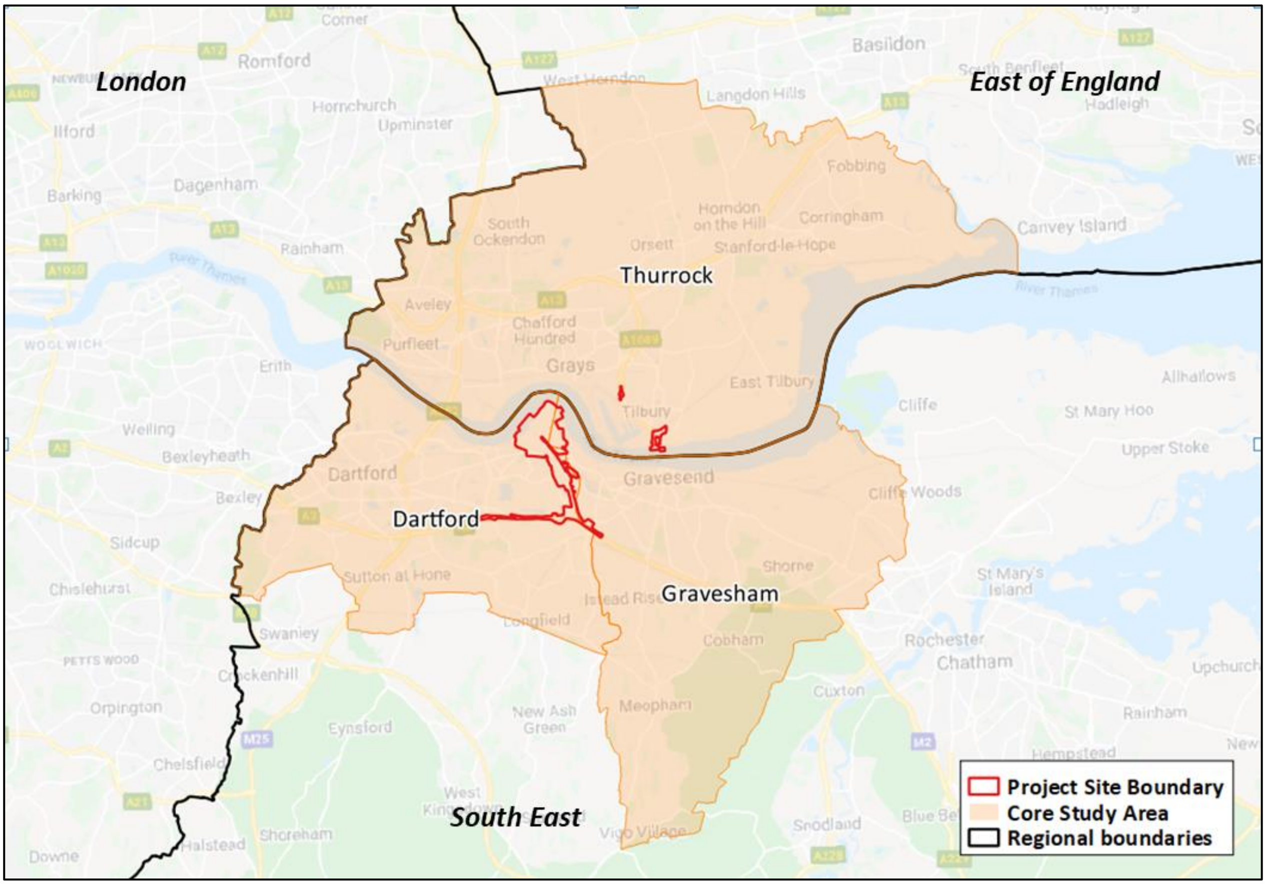
VIABLE DISTANCE FROM THE SITE

3.3 It is common in the construction of major projects that non-home based workers requiring temporary accommodation look for options within a reasonable commuting distance of the site. This distance is usually shorter than that of the home-based workers.

3.4 This assessment has assumed that the construction worker catchment for daily (home based) commuters is likely to be within 60-minutes travel time to the site. It is therefore expected that non-home based workers requiring temporary accommodation will seek accommodation within a smaller catchment than 60-minutes travel. This assessment considers existing room stock within the CSA, comprised of the local authorities of Dartford, Gravesham and Thurrock. It also considers a few tourism accommodation options if they lie just outside of the CSA or are particularly accessible to the site.

3.5 Whilst it is plausible that some workers may choose temporary accommodation further from the site, the effect at wider geographies is unlikely to be significant. This provides a conservative assessment of the impacts of the London Resort on local accommodation.

Figure 3-1: CSA in which construction workers will likely seek temporary accommodation



FACTORS INFLUENCING ACCOMMODATION CHOICE

3.6 The choice of accommodation stock option partly depends upon the length of the construction worker contract. For short-term jobs, workers will tend to utilise the tourism accommodation market including serviced accommodation, non-serviced accommodation or campsites which workers may bring a caravan to or rent a caravan from, since these offer the most flexible solutions. For slightly longer contracts (months), workers could utilise the tourism accommodation market or the private rented sector (PRS). In the case of very long-term contracts (years), the owner occupied housing market is a further option, particularly if the worker has a family which will move with them, however this is typically a very minimal proportion of overall workforce.

3.7 There is also a question of availability and affordability when looking at reasonable accommodation options. Availability can be accounted for by applying reported occupancy or vacancy rates to the total stock.

3.8 For affordability, under the Construction Industry Joint Council (CIJC) Working Rule Agreement,[9] construction industry workers can receive subsistence allowances of just over £40 a night to cover accommodation and food and drink. For other workers on higher salaries or able to add to their subsistence allowance, they may be able to afford higher priced accommodation. The stock, availability and affordability assumptions are discussed in more detail for each subsection below.

EXISTING STOCK BASELINE

3.9 This analysis is based on stock levels before the COVID-19 pandemic, which has likely had an impact on demand and vacancy levels. Given the lack of more recent data, this strategy has used pre-pandemic data and assumed that the market will return to these levels by 2023 (the peak year of Gate One construction).

Tourism accommodation

Serviced accommodation

3.10 The serviced accommodation sector includes the provision of furnished short-stay accommodation with daily cleaning, bed-making, food and beverage services. These normally take the form of hotels but can include other forms of serviced accommodation such as serviced apartments, pubs, B&Bs and guesthouses.[10] The most recent data for Dartford and Gravesham is from the Visit Kent 2019 accommodation audit.[11] For Thurrock, room numbers are taken from the 2016 Visit Britain accommodation stock audit.[12] Combining these sources results in an estimated 1,800 serviced accommodation rooms in the CSA. Additional sites just outside the study area but highly feasible options for construction workers given short commutes to the site have also been considered here, providing 160 additional rooms. It is conservatively assumed that each worker would require one room (i.e. there would be no sharing).

3.11 Visit Britain[13] reported that hotel room occupancy in the East and South East reached a peak of 86% over 2019 which has conservatively been applied as a year-round occupancy despite lows of 63%. Analysis suggests that 15% of these rooms will be affordable for construction workers.[14]

Non-serviced accommodation

3.12 This category of accommodation includes the provision of accommodation in self-contained spaces consisting of complete furnished rooms or areas for living/dining and sleeping, with cooking facilities or fully equipped kitchens. This may take the form of

[9] Which all contractors will be required to sign up to as a minimum
[10] Retrieved from https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Holiday_and_other_short-stay_accommodation. Accessed September 2020
[11] Visit Kent, 2019, Accommodation Audit
[12] Visit Britain, 2016, Accommodation Stock Audit
[13] Visit Britain, 2019, Accommodation Occupancy
[14] Average daily rates over the year for hotel rooms in the area were analysed and compared to the affordability of construction workers subject to the CIJC Working Rule Agreement

apartments or flats in small free-standing multi-storey buildings or clusters of buildings, or single storey bungalows, chalets, cottages and cabins. Very minimal complementary services, if any, are provided.[15] This sector has seen high growth in recent years,[16] with the trending 'sharing economy' leading to a rise in popularity of online home sharing marketplaces, offering opportunities for peer-to-peer short-term rental transactions.

3.13 Recent research by YouGov and Capital Economics[17] found that 16% of adults in Great Britain had let all or part of their property in a short term let[18] in the past two years, whether through an online platform or arranged formally or informally offline.[19] This rises to just over 17% for the East and South. Given a lack of more detailed information, this report has halved (to better represent a worst case scenario) this 17% to provide an estimate for the proportion of adults in the East and South East that might let all or part of their property in one year. To account for the difference between the regional supply rates and the CSA itself, the average number of serviced rooms per local authority for the CSA was compared to that of the East & South East.[20] The comparison finds that the CSA rate is 38% that of the regional rate. Overall, it is therefore estimated that 3% of CSA households might have engaged in the sector in the last year. Applying this to the total number of non-vacant privately owned dwellings in the CSA (129,000) implies that just over 4,000 CSA properties are involved in some form of short term let each year.

3.14 Other parameters from the entire non-serviced accommodation industry are not well known. However, one home sharing website business does release useful data, and this company can be considered a reasonable proxy for the market as they are considered to make up a large proportion of the non-serviced market.[21] This company report that hosts in the East and South East host an average of 36 nights per year.[22] This is factored by occupancy in order to estimate that each host lists their offering 42 times each year.[23] Applied to the 4,000 properties, this elicits just under 176,000 nights per year listed in the CSA. It is also reported that, in the CSA, there is an average of 2.2 rooms per listing, which equates to just over 387,000 rooms listed each year in the CSA. On a per night basis,

[15] Retrieved from https://ec.europa.eu/eurostat/statistics-explained/index.php/Glossary:Holiday_and_other_short-stay_accommodation. Accessed September 2020

[16] For example, between 2016 and 2019, the number of active rentals (as reported by Airdna.co) grew by 493% in Dartford and by 419% in Gravesham. Retrieved from Visit Kent, 2019, Accommodation Audit.

[17] Capital Economics, 2019, The impact of short-term lets: Analysing the scale of Great Britain's short-term lets sector and the wider implications for the private rented sector.

[18] The report states with regard to defining short term lets, *"Although there are no official definitions, for the purposes of this report we define short-term lets as lets of entire properties or parts of properties of between one night and six months. Short-term lets provide flexible accommodation for tourists and those staying in a location for a short period. They are generally agreed between the 'host' and 'guest' through an online platform. This differs from traditional longer term tenancies in the private rented sector which typically have an initial fixed term of six months or more and are conducted under an Assured Shorthold Tenancy Agreement or similar."*

[19] The English Housing Survey (2017/18) found that 12% of respondents answered yes to the question "In the past 12 months, have you used these or similar organisations to let your home or part of your home? Airbnb, FlatClub, FlipKey, HomeAway, Housetrip, Roomorama, Uproost, Vive Unique, Windu, WorldEscape, 9Flats, other similar organisation?". However, given that this records activity in the sector over one year, the YouGov source used provides a more conservative estimate (once halved).

[20] This method assumes that serviced room development is equally likely in all local authorities

[21] The House of Commons Briefing Paper on short-term lettings names Airbnb as the market leader and focusses their discussion on the company whilst acknowledging that it does not provide a comprehensive view of the entire market. House of Commons, May 2020, Briefing Paper 8395, The growth in short-term lettings (England).

[22] Airdna.co is a website which reports short term lettings statistics for Airbnb and Vrbo, and is used in the Visit Kent (2019) Accommodation Audit to demonstrate the short-term lettings market.

[23] In the absence of more information, serviced accommodation occupancy in the East and South East derived above (86%) is assumed to apply to non-serviced accommodation.

therefore, there are expected to be 1,060 rooms offered each night within the CSA in the non-serviced tourism accommodation sector.

3.15 In the absence of more information, serviced accommodation occupancy and affordability in the East and South East derived above (86% and 15% respectively) is assumed to apply to non-serviced accommodation. This is conservative as the sector is generally considered cheaper than the serviced accommodation sector.[24]

Campsites

3.16 Visit Britain campsite data was used and combined with a manual search of campsites just outside the CSA (within a reasonable commute), and pitch information was gathered from the campsite websites. It is conservatively assumed that there is one pitch per worker.

3.17 According to UK Caravan and Camping Alliance, occupancy rates for English holiday parks / campsites reached a peak of 70% in 2018 which has conservatively been applied as a year-round occupancy despite high variability with lows of 11%.[25] The same survey reported that the total cost of holiday accommodation (touring pitch fees, park fees and park facility fees) was £26, hence all pitches are considered affordable.

Table 3.1: Tourism accommodation rooms (and available and affordable for construction workers) in the CSA

		Rooms
Serviced accommodation	Total	1,900
	Available and affordable	40
Non-serviced accommodation	Total	1,060
	Available and affordable	20
Campsites	Total	40
	Available and affordable	10
Total available and affordable		75

3.18 Overall, the summary table shows that, accentuated by the conservative assumptions applied, the CSA is highly constrained in terms of available and affordable tourism accommodation options for construction workers. This is consistent with findings from other strategies which state that tourism accommodation is the least affordable type of accommodation for construction workers.[26]

3.19 This assessment is based on conservative assumptions on occupancy, data inputs and the number of construction workers requiring temporary accommodation. It is mostly likely to be representative of peak times where the use of accommodation by workers may have

[24] House of Commons, May 2020, Briefing Paper 8395, The growth in short-term lettings (England).
[25] UK Caravan and Camping Alliance, 2019, Pitching the Value: Economic Benefit Report for Holiday Parks and Campsites UK
[26] Wylfa Newydd Project, 2016, Construction Workers Accommodation Strategy

adverse economic impacts if people are displaced from accommodation. There may be more capacity during off-peak times, when the use of accommodation could have beneficial economic effects.

Private rented sector

3.20 According to Dartford housing and general monitoring, 3,206 (net) new homes were completed in Dartford over the last three financial years. This delivery track record results in a housing delivery target output of 161%.[27] Over the three years to March 2018, only 64% of dwellings needed in Gravesham were delivered.[28] In the three years to March 2019, 1,867 dwellings were delivered in Thurrock,[29] equivalent to 60% of the identified need.[30] Overall, housing delivery in the CSA could be considered sensitive issue for both PRS and OOS.

3.21 The most recent estimate for PRS and OOS dwelling stock is from 2018.[31] These proportions have been applied to 2019 estimates of private dwelling stock[32] to estimate 24,800 PRS dwellings in the CSA. According to the Census, in 2011 there were 2.3 PRS bedrooms per PRS dwelling,[33] which is applied to the 2019 dwelling count to estimate that there are currently 57,400 PRS bedrooms in the CSA. It is assumed that there would be one bedroom per worker.

3.22 The English Housing Survey reports that approximately 10% of PRS dwellings across England are vacant[34] and that this has been the case since the early 2000s.[35] In the absence of more localised data, this is used to proxy PRS vacancy rates in the study areas. This vacancy rate includes natural vacancies which are required to give the market fluidity and allow it to function. This fluid element is approximated by taking the proportion of dwellings in the study areas that were living at a different address one year before the Census was taken (c. 30%)[36] and adjusting to a monthly statistic of c. 2%. This leaves an overall property vacancy rate of c. 8%. Notably, this method does not include available "spare rooms" in non-vacant properties that could be let out in the PRS sector using month-by-month tenancy agreements. In the absence of more information, these have been conservatively excluded from stock estimates.

3.23 The ONS release rental market summary statistics, breaking down monthly rent in the PRS sector by region, administrative area, and number of bedrooms.[37] This analysis has

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[27] Dartford Borough Council, 2020, Housing and General Monitoring. Retrieved from https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/five-year-housing-land-supply. Accessed October 2020.
[28] Gravesham Borough Council, 2019, Housing Delivery Action Plan
[29] Thurrock Council, 2020, Planning policy monitoring: Housing completions 2018/19
[30] Thurrock Council, 2015, A housing strategy for Thurrock.
[31] ONS, Subnational dwelling stock by tenure estimates, 2018. These research outputs are not official statistics on dwelling stock by tenure.
[32] MHCLG, 2019, Live tables on dwelling stock (including vacants): Table 100 Dwelling stock: Number of Dwellings by Tenure and district: England 2019
[33] This is calculated by taking the number of PRS bedrooms in the CSA (50,000) and dividing by the number of PRS households (22,000). ONS, 2011, Census; Tables DC4405E and KS402EW.
[34] English Housing Survey, 2018
[35] MHCLG, 2011, Dwelling Stock Estimates: 2011 England. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6868/2039750.pdf
[36] Census, 2011, Table UKMIG011
[37] MHCLG, 2018/19, Private rental market summary statistics

adjusted the data for the study areas to be on a per room per working night basis.[38] This approach results in median rent per room per working night ranging between £40 (for one beds) and £25 (for four beds). Based on this, it is assumed that all rooms will be affordable.

3.24 Overall, it is expected that there are 4,600 PRS rooms that are available and affordable for construction workers in the CSA.

Table 3.2: PRS rooms (and available and affordable for construction workers) in the CSA

	Rooms
Total PRS dwellings	24,800
Total PRS bedrooms	57,400
Total available and affordable	4,600

Owner occupied sector

3.25 Estimates of total OOS dwelling stock were derived via the methodology outlined in paragraph 3.21. The profile of construction workers that would tend to seek this type of accommodation is more senior, managerial roles. Given this, these workers are most likely to either live by themselves (in a one bed or studio) or to live with their families (who would take up other rooms in the dwelling but are not included in the jobs estimates). Very few would look to buy and share with another worker(s). Therefore, a conservative ratio of one OOS dwelling per worker has been assumed.

3.26 According to the English Housing Survey, 4.3% of OOS households are vacant, and 3% of England OOS households moved in the past year. This suggests a spare capacity of 1.3% in the OOS.

3.27 The median house price in the CSA is £296,000, higher than the England rate (£240,000).[39] The median house price to affordability ratio in the CSA is 9.1, meaning that a resident on a median income would need just over nine times their earnings in order to afford a house in the area. This is on par with the equivalent ratio for the East (9.0), higher than England (7.8) and lower than the South East (9.7). Overall, it can be deduced that houses are less affordable in the CSA than the national average. However, it is likely that construction workers looking to utilise this accommodation option will be on a higher than median salary. It has conservatively been assumed that half of the dwellings in the CSA will be affordable for construction workers.

3.28 There are expected to be 1,400 houses available for sale each year in the CSA, 700 of which could be considered affordable, equating to 700 rooms available for construction workers.

[38] Where an average of 16 working nights per month has been applied
[39] MHCLG, 2019, House price to residence based earnings ratio

Table 3.3: OOS rooms (and available and affordable for construction workers) in the CSA

	Rooms
Total privately owned dwellings	108,000
Total spare capacity	1,400
Total available and affordable rooms	700

Summary of existing available and affordable rooms

3.29 Overall, it is expected that the CSA has at least 5,400 rooms that are available and affordable for construction workers at any point throughout the year. The majority (86%) of these are found within the PRS (4,600), with the fewest in the tourism accommodation sector.

3.30 Latent accommodation is defined as spare rooms or other accommodation that are not currently rented out, but which could be and which could generate income for local households. In some other accommodation strategies, these are estimated separately, usually by surveying the local area (across both PRS and OOS) and ascertaining willingness for local residents to offer part of their home to the construction workers for a part of the project length. However, it is highly likely that these residents could now seek to utilise home sharing websites in order to market their offering, hence the non-serviced accommodation sector estimates included in the above analysis could at least partially capture some of this latent accommodation market. In the absence of more information around how these two stock offerings interact, the latent accommodation sector is conservatively not estimated separately in these stock estimates. It is instead assumed that all latent accommodation is captured by the non-serviced estimates.

Table 3.4: Summary of available and affordable rooms in the CSA by accommodation type

Accommodation Type	Rooms
Tourism	75
Private rented sector	4,600
Owner occupied sector	700
Total	**5,400**

FUTURE STOCK BASELINE

3.31 The Gate One construction phase peak is expected in 2023 and Gate Two in 2028. There will likely be growth in both tourism accommodation and housing stock up to this year that might increase the options available to construction workers above that which has been derived above. For example, consultation with Locate in Kent informed that a 60 room mid-market hotel had planning consent in Gravesend. The five year housing supply statements from the CSA local authorities identify deliverable sites of at least 9,700 homes up to 2025.[40]

3.32 However, this development is dependent upon many factors. For example, if the DCO application is accepted, this will increase the tourism offering in the area, potentially incentivising hotel developers to direct investment to the nearby area that might not otherwise be realised. Furthermore, once construction starts, accommodation providers will have more confidence in the delivery of the London Resort and could be incentivised to deliver more supply to meet demand from workers and visitors. On the other hand, there is significant uncertainty due to COVID-19, which could hinder the delivery of hotels and housing in the area. These market pressures may be exacerbated by the British exit from the European Union. In the absence of more information about stock growth, this report has conservatively assessed 2023 and 2028 impact against existing stock levels.

IMPACT OF THE PEAK CONSTRUCTION WORKFORCE ON THE 2023 AND 2028 CSA ACCOMMODATION STOCK

3.33 As discussed earlier, different types of construction workers will seek different types of temporary accommodation. For example, it is highly likely that a negligible number of workers will seek OOS accommodation due to the short construction period. Therefore, despite low future supply of 700 rooms, this is expected to be more than enough to accommodate these types of workers. If a large proportion of the workers were short term, flexible contractors, the most suitable accommodation market for these workers (tourism) will not be able to provide sufficient capacity for this type of demand given only 75 available and affordable rooms. For the medium term contractors, the PRS market is the most appropriate and is the most able to absorb their demand, with an estimated 4,600 available and affordable rooms. However, the detailed construction programme is still being finalised so, in the absence of this information, total workforce is compared to total stock.

3.34 The future accommodation stock baseline found that options will be constrained within the CSA, with a total of 5,400 available and affordable rooms. Without intervention of any specific form of temporary accommodation offered to them then, it is expected that the 2,500 Gate One peak non-home based workers who will be requiring some form of temporary accommodation would account for approximately 46% of the available total stock, placing high constraints on the market. For Gate Two, the 850 peak non-home based workers would account for 16% of this available stock, smaller than Gate One impact but still sizeable.

3.35 Considering the impact of the cumulative schemes (along with the London Resort), there is estimated to be up to 3,100 construction workers seeking temporary accommodation in the area in 2023 (58% of available stock) and 1,100 in 2028 (20% of available stock).

[40] Dartford Borough Council, Dartford Five Year Deliverable Housing Supply, 2019; Gravesham Borough Council Five Year Deliverable Housing Land Supply Statement 2018 – 2023; consultation with Thurrock Council.

3.36 As discussed above, Gate One visitors may place additional demand on accommodation stock in 2028. Paragraph 5.5 contains more discussion.

Table 3.5: Summary of construction workforce impact on available stock in 2023 and 2028

		2023	**2028**
CSA available and affordable rooms		5,400	
Peak non-home based workforce requiring temporary accommodation	London Resort	Up to 2,500	Up to 850
	London Resort and cumulative schemes	Up to 3,100	Up to 1,100

3.37 Overall, it is clear that the future CSA accommodation stock market is highly constrained and will suffer high pressure if the London Resort and cumulative schemes decided to only utilise existing markets. Given this, on-site accommodation provision is strongly advised for the London Resort.

Chapter Four ◆ Stakeholder Engagement

INTRODUCTION

4.1 This section summarises the stakeholder engagement which the London Resort has considered in order to inform the strategy.

4.2 In 2014/15, the Applicant carried out several stages of public consultation. These included a variety of events and workshops on socio-economic considerations. This included engagement with local authorities and the EDC who all raised the issue of temporary construction workforce and their potential impact on an already constrained housing and accommodation market. Feedback included the need for more information, and the need to mitigate adverse effects where possible. This feedback, which is consistent with the feedback received more recently on the same issue (detailed below), has been taken into consideration in devising this strategy.

Table 4.1: Summary of stakeholder engagement with regards to the construction workforce accommodation strategy

Date	Meeting Summary
20/07/20	Initial meeting with Thurrock Council to discuss aspects of the socio-economic chapter. Discussion considered the peak construction workforce, the likely impact on the available and affordable accommodation stock, and proposed mitigation. Stakeholders reiterated the desire to maximise jobs locally, thus reducing the need for non-home-based workers and in turn temporary accommodation. However the conclusion of there being constraints in the accommodation market were agreed, and suggestions of forms of temporary accommodation to alleviate this were broadly welcomed.
14/08/20	Initial meeting with Arcadis on behalf of Ebbsfleet Development Corporation to discuss aspects of the socio-economic chapter to the ES. Discussion considered the peak construction workforce, the likely impact on the available and affordable accommodation stock, and proposed mitigation.
03/09/20	Initial meeting with Gravesham Borough Council to discuss aspects of the socio-economic chapter and the peak construction workforce, the likely impact the local accommodation stock, and proposed mitigation. Gravesham Borough Council noted the desire to maximise jobs locally but suggestions of forms of temporary accommodation to alleviate this were broadly welcomed.
10/09/20	Initial meeting with Kent County Council to discuss aspects of the socio-economic chapter. Discussion considered the peak construction workforce, the likely impact on the available and affordable accommodation stock, and proposed mitigation. Stakeholders reiterated the desire to maximise jobs locally, thus reducing the need for non-home-based workers and in turn temporary accommodation. However the conclusion of there being constraints

Date	Meeting Summary
	in the accommodation market were agreed, and suggestions of forms of temporary accommodation to alleviate this were broadly welcomed.
21/09/20	Meeting with Visit Kent, Locate in Kent and Gravesham to discuss hotel accommodation in the area. Confirmed local constraints, emphasising the requirement for on-site accommodation. It was identified that there is a pipeline of stock coming forward across the wider area, but considerable uncertainty exists about the viability of existing stock as well as the deliverability of future stock due to COVID-19.
14/10/20	Meeting with Dartford Borough Council, Ebbsfleet Development Corporation and Arcadis. The Applicant presented the construction workforce and plans for onsite temporary accommodation provision. Feedback was that the ES should discuss the location of the mobile homes and cruise ship(s) and how the construction workers would access the site from north of the river. The location of mobile homes and cruise ship(s) is discussed in this report. Appendix 3.1: *Outline Construction Method Statement* (document reference 6.2.3.1) contains more information on worker access.
10/12/20	Meeting with Dartford, Gravesham, EDC (and representatives) and KCC. The accommodation strategy was presented and discussed. Queries were raised over the on-site accommodation being able to include families. It was explained that no families were expected in either phase.

Chapter Five ◆ Construction Accommodation Strategy

INTRODUCTION

5.1 The accommodation that the non-home-based workers decide to take up will partly depend on which of the options (either in its entirety or a blend of various options) outlined below are taken forward by the London Resort in the finalised construction workforce accommodation strategy.

5.2 Key considerations in the design of these options include:

- The potential adverse impacts on local communities;
- The potential adverse impacts on local housing markets;
- The health and wellbeing of the construction workforce; and
- The different needs of construction workers, with respect to affordability, location, and type of accommodation.

TEMPORARY ACCOMMODATION OPTIONS

5.3 The preliminary options for temporary accommodation provision are outlined below. It is important to note that it is unlikely one option on its own could account for the entire need for temporary accommodation by construction workers at the London Resort; it is more realistic that a mix of these options will be provided.

Rely on existing accommodation options	
All workers seeking temporary accommodation utilise existing markets, purchasing rooms in tourism accommodation, PRS and OOS.	
Advantages -Brings money to local markets from construction worker spend, inducing positive economic impacts	Disadvantages -The above findings conclude that workers (and workers from cumulative schemes) will be heavily reliant on the PRS, with insufficient capacity in the tourism accommodation market and OOS. That said, this is based on conservative assumptions.[41] It

[41] It is conservatively assumed that all workers would seek temporary accommodation in the CSA when in reality some could seek temporary accommodation in other areas. Peak occupancy in the tourism accommodation market is applied to year-round stock despite high seasonal

Rely on existing accommodation options	
-The demand generated by the London Resort should stimulate improvements in the existing housing and tourist stock, generating legacy benefits -Using existing accommodation that is not fully occupied is responsible, cost efficient and sustainable	also does not assume any growth in the accommodation stock (which is likely to occur). -It is likely that the additional demand will place excessive pressure on the markets, particularly tourism accommodation stock. -The construction workforce would be dispersed across the CSA community, with the potential to negatively impact vulnerable groups such as over 65s,[42] women[43] and LGBTQ workers.[44] -Hotel demand from the construction workforce could preclude tourists visiting the area -The presence of the construction workforce could discourage tourists from visiting the area, reducing tourist spend.

Purchase or rent a decommissioned cruise ship which will be docked at the port of Tilbury	
The London Resort have had several approaches from ferry companies looking to sell or lease cruise ships in response to the PEIR. So far, discussions suggest that a cruise ship could have a capacity for approximately 1,000 to 2,000 workers. There is also room for a second ship if required.	
Advantages -Provide huge relief to the high demand of the temporary workers, offering large enough capacity to accommodate the majority of the Gate One non-home based workforce and all of the Gate Two non-home based workforce. -The price of the rooms will be pitched in line with the local market so as not to displace demand from existing options. - The accommodation will be safe, secure and well-managed and easy to book. There may	Disadvantages -Potentially unsightly for nearby residents. -Minimises potential for knock on economic benefits in the local area, as most construction workforce related activity will be contained onboard.

variation. It is conservatively assumed that there is one worker per room in the tourism accommodation market, one per bedroom in the PRS and one per dwelling in the OOS, despite there being an average bed space of 2 per room in the tourism accommodation and PRS and (generally) more than one bed space per dwelling in the OOS.

[42] Health and Safety Executive (2019): Preventing Workplace Harassment and Violence

[43] TfL (2019): Travel in London: Understanding Our Diverse Communities 2019

[44] Construction News (2014): Sexist, Racist and Homophobic Language Common in the Construction Industry

Purchase or rent a decommissioned cruise ship which will be docked at the port of Tilbury	
also be other benefits associated with high quality food options, opportunities for socialising and social events. -Potential to provide training opportunities for hospitality roles at the London Resort. -Minimises impact on the roads and public transport from commuting non-home based workers that would otherwise be travelling within the CSA to work. -Allows workers to have instant access to the site, increasing on-site productivity and reducing health and safety risks. -Workers will be contained on one site rather than spread across the community, thereby decreasing the risk of adverse social impacts on vulnerable groups. -Provision of catering facilities and showers, toilets and changing facilities, all of which will go through a rigorous timed cleaning process.	

Mobile homes located on-site	
Appendix 3.1: *Outline Construction Method Statement* (document reference 6.2.3.1) shows the area on-site where mobile homes would be located. It is calculated that there would be capacity for 500 to 700 worker homes on the Gate Two site, which could be utilised for the Gate One workforce. There is also room at Tilbury for mobile homes which could be utilised for the Gate Two workforce.	
Advantages - Provide huge relief to the high demand of the temporary workers -Flexible provision which can be adapted depending upon demand. -Minimises impact on the roads and public transport from commuting non-home based workers that would otherwise be travelling within the CSA to work.	Disadvantages - Potentially unsightly for nearby residents - Connection to services such as waste management and electricity can be feasibly difficult -Minimises potential for knock on economic benefits in the local area, as most construction workforce related activity will be contained onboard.

Mobile homes located on-site	
-Allows workers to have instant access to the site, increasing on-site productivity and reducing health and safety risks. -Workers will be contained on one site rather than spread across the community, thereby decreasing the risk of adverse social impacts on vulnerable groups. -Provision of catering facilities and showers, toilets and changing facilities, all of which will go through a rigorous timed cleaning process.	

THE APPLICANT PREFERRED OPTION

5.4 The Applicant currently prefers a combination of the cruise ship and mobile homes on-site to meet the demand of the temporary non-home based workers and mitigate negative impacts on the local constrained accommodation market.

5.5 The options are such that they can fully mitigate the demand for both the Gate One and Gate Two peak workforce. In this way, the cumulative impact of the Gate Two peak workforce and the Gate One visitors on local accommodation options does not need to be considered in this strategy. Instead, the impact of the visitors on local accommodation options is considered as a separate effect in Chapter 7: *Land use and socio economics* (document reference 6.1.7).

Approach to management and monitoring

5.6 The Applicant recognises that the prospect of a large number of construction workers moving to the area can be concerning for local residents. The Applicant is committed to managing and monitoring the accommodation impacts of the workforce on an ongoing basis.

Accommodation matching service

5.7 The Applicant will facilitate the matching of accommodation providers and construction workers, either through key appointed personnel or an online hub.

5.8 The matching service will gather the entire list of available accommodation for workers, including on-site accommodation managed by the principle contractor and any external providers (such as a homeowner with a spare room). This will generate a one-stop-shop for the London Resort worker accommodation market.

5.9 The service will include, but may not be limited to:

- Allowing providers (personal and businesses) to register, placing listings which detail various features (such as price, access to facilities that the listing has);
- Give information to providers on their statutory obligations (e.g. fire regulations); and
- Allow workers to select their accommodation preferences based on location, price, access to facilities etc.

5.10 It will be up to accommodation providers to take bookings and enter into contractual arrangements with workers.

Workforce monitoring

5.11 The take-up of various accommodation will be gathered by the matching service by conducting regular checks and ensuring that all contractors are keeping up to date with the changing accommodation needs of their workers such as the flexibility of the contract needed or whether they require their families to join them.

5.12 Furthermore, regular dialogue between the Applicant and the provider market will be encouraged, in order to ensure that any issues or problems are identified as soon as possible.

5.13 Appropriate actions to address potential concerns will be developed. For example, if one area or accommodation provider is experiencing excessive demand (as identified by the regular dialogue), the monitoring service should be made aware and workers will be directed to alternative locations for their accommodation needs.

5.14 In consultation with relevant stakeholders, the management of the service will be adjusted if necessary, based on the findings of the monitoring.

Workforce behaviour management

5.15 All workers will be required to adhere to the Worker Code of Conduct (the Code), which details the behavioural standards expected of them, as well as of all workers for contractors throughout the supply chain. The Code is enforced to ensure that the entire workforce have no impact on the local community in terms of antisocial behaviour, vandalism, property destruction or other types of social crime. The Code is enforceable in both working and non-working hours. Violation of the Code will result in intervention and the Applicant could preclude the operative from working on the London Resort. Chapter 7: *Land-use and socio-economics* (document reference 6.1.7) contains more detail on the Code and enforcement measures.

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