The Sizewell C Project

8.10 Accommodation Strategy

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1.1 Introduction

1.1.1 The construction of Sizewell C would require a significant workforce – up to 7,900 workers at the peak – with a further 600 workers needed to operate the associated developments.

1.1.2 SZC Co. would seek to maximise local recruitment of the workforce, as set out in the **Economic Statement** (Doc Ref. 8.9) and its appended **Employment, Skills and Education Strategy** provided in **Appendix A**, so that local people can benefit from the economic opportunities and social mobility offered by the Sizewell C Project.

1.1.3 At the peak of construction activity, it is estimated that of the c. 7,900 peak workforce:

- Around 2,000 workers would be people who are already living in the local area (home-based (HB) workers) – this includes construction and operational workers joining the Sizewell C Project during the construction phase:
  - This is defined as living within a 90-minute commute, referred to as the Construction Daily Commuting Zone (CDCZ).
- In addition, it is estimated that all 600 associated development workers would also be recruited from the local area. These workers are not included in the overall 7,900 total.
- The remainder (around 5,900) would come from further afield (non-home-based (NHB) workers) and would require temporary accommodation within a 60-minute commute from the main development site. These workers, at peak, are likely to take the following types of accommodation:
  - Up to 3,000 workers could occupy an accommodation campus and caravan park provided by the Sizewell C Project.
  - Around 800 workers would be expected to seek tourist accommodation in a range of types (e.g. serviced, self-catering, caravans) depending on price, location, and availability.
  - Around 1,200 workers would be expected to seek tenancies in the private rented sector (PRS).

- Around 880 workers are predicted to buy accommodation (owner-occupied sector), including NHB operational staff making a permanent move to the area and workers in long-term construction and support/management roles.

1.1.4 This breakdown is considered to be an upper estimate as it does not include workers seeking spare rooms in existing homes, or in currently unregistered accommodation known as 'latent accommodation' – this type of accommodation has proved popular at Hinkley Point C (Ref. 1.1).

1.1.5 In response to the requirement for a large NHB workforce, SZC Co. has developed a balanced **Accommodation Strategy**. This strategy makes use of existing local accommodation where possible, in order to deliver local economic benefits, but also seeks to avoid impacts on the local accommodation market by providing temporary project accommodation in the form of a single, 2,400 bed accommodation campus on the main development site and a caravan park with up to 400 pitches (with an estimated occupancy of 1.5 workers per caravan) on the land east of Eastlands Industrial Estate in Leiston (LEEIE).

1.1.6 SZC Co. is also proposing to establish a Housing Fund to support the local housing market during the construction phase by boosting and improving the efficiency of existing supply, providing resilience, and supporting the delivery and management of tourist accommodation. This Housing Fund will be secured through an obligation in a Section 106 Agreement (see **draft Section 106 Heads of Terms** which are appended to the **Planning Statement** (Doc Ref. 8.4).

1.1.7 This **Accommodation Strategy** forms part of the suite of documents supporting the Development Consent Order (DCO) application for Sizewell C. It sets out the demand for accommodation from NHB workers; the project accommodation proposed as part of the associated development for Sizewell C; the potential for worker use of existing local accommodation; and measures to avoid or reduce significant effects on households and the operation of the housing markets.

1.1.8 The purpose of this **Accommodation Strategy** is to represent a balanced solution for meeting the temporary increase in local accommodation demand which the Sizewell C Project would generate – offering construction efficiencies and supporting the project's aspirations for zero harm; delivering economic benefits for the local area and mitigating impacts during the construction phase.

1.1.9 This strategy seeks to ensure that workers are accommodated in a way which maximises benefits and ensures that impacts are minimised and, where appropriate, mitigated and managed. The document explains how

the strategy has been developed, describes how it would increase the supply of accommodation, and how it would operate throughout the construction of the Sizewell C Project.

1.1.10 This strategy does not cover the operational phase of the Sizewell C Project, including outages because:

- The anticipated demand for accommodation in the operational phase is low in comparison with the construction phase and the demand is likely to be iterative and spread over a number of years, coinciding with the rundown of construction (and the release of some accommodation previously used by construction workers). It is therefore not anticipated that there would be any adverse effects in meeting the accommodation demands associated with the operational phase. The potential significant adverse effects of the operational workforce on accommodation demand are assessed in the Socio-economic chapter of the ES (**Volume 2, Chapter 9**) which concludes that the effects are negligible and not significant.

- The local area is able to cope with outages every 18 months or so at the existing Sizewell B station. These have a substantial NHB workforce in the region of 850 workers (out of approximately 1,000 total outage workers) and are absorbed by the local accommodation market without significant difficulties. This is a similar number to that predicted for Sizewell C outages so no significant adverse effects are predicted. Planned outages for each unit will be scheduled so as not to overlap.

1.2 Structure and content of this strategy

1.2.1 This strategy sets out:

- At **section 2** – The overall context for the assessment of potential effects on accommodation and housing markets including the size, profile and characteristics of the workforce, their choices of accommodation, and their distribution. It also includes a summary of the local demographic and housing characteristics, engagement undertaken by SZC Co. with East Suffolk Council (ESC) on this subject, and a review of local policies and strategies relevant to the assessment.

- At **section 3** – The objectives and principles of this strategy.

- At **section 4** – The stock, characteristics, and capacity of existing accommodation sectors across tourist, private-rented, and owner-occupied sectors.

- At **section 5** – SZC Co.'s approach to the provision of project accommodation including an on-site accommodation campus and worker caravan park.

- At **section 6** – SZC Co.'s approach to accommodation management, setting terms of reference for ensuring that potential adverse effects can be managed at source, or monitored and mitigated before or as they arise.

- At **section 7** – SZC Co.'s justification for a Housing Fund to boost supply in the accommodation market and improve resilience should adverse effects arise. This includes a range of measures, an estimated breakdown of how the Housing Fund could be implemented, and a proposed structure for governance.

1.2.2 This strategy should be read alongside, or with reference to the following documents within the DCO application:

- **Sizewell C Main Development Site Design and Access Statement** (Doc Ref. 8.1) which sets out details of the design and appearance of the proposed accommodation campus and caravan park;

- **Volume 2, Chapter 9** of the **ES** (Doc Ref. 6.3) which sets out the likely significant effects associated with non-home- based workers' demand for accommodation;

- **Planning Statement** (Doc Ref. 8.4) which considers the consistency of the proposals with planning policy; and

- **Draft Section 106 Heads of Terms** (which is appended to the **Planning Statement** (Doc Ref. 8.4)) which sets out the substantive proposed development consent obligations which SZC Co. considers to be required in relation to the Sizewell C Project (including the Housing Fund and Accommodation Management System).

1.2.3 Throughout this document, data has been presented for East Suffolk District where available. Where data was produced or reported at different scales prior to the merger of Waveney District and Suffolk Coastal District Councils, these geographies have been set out.

2 Context

2.1 Workforce size and profile

2.1.1 SZC Co. has estimated the number of workers required in each month across the construction phase by skill level, which has subsequently informed an estimate of how many workers could potentially be drawn from the local labour market (HB), and how many would need to be recruited from outside the area (NHB). This is set out in a workforce profile.

2.1.2 The workforce profile is explained in **Technical Note 1: Workforce Profile**, provided in **Appendix 9A** of **Volume 2** of the **ES**. In summary:

- The workforce profile is split into four main elements: the civil construction work; the mechanical, electrical and heating construction work; the professional, management, administrative and other staff who would oversee the whole construction project; and the operational staff who would start work on site part-way through the construction phase.
- In the early years, the workforce profile is mainly driven by the requirement for civils roles, supported by non-construction project management, professional roles, and site support roles.
- During this time there is a component of the workforce constructing the associated development sites.
- The civils workforce peaks at just above 3,600 workers in year five of the construction phase.
- The civils workforce then reduces, as 'J0' (the date EDF uses to denote the first pour of nuclear safety related concrete – a standard milestone in French nuclear construction) is passed and at this stage there is an increase in mechanical, electrical, and heating roles. During this stage, the operational workforce is also starting to build up. 'J0' is assumed to occur in year five of the construction phase.
- The peak of the construction workforce occurs in year seven of the construction phase – at this stage the mechanical, electrical and heating workforce peaks at around 3,300 roles.
- The peak of the construction workforce is relatively short – it is unlikely to exceed 7,000 workers for more than two years.

- Following the mechanical, electrical, and heating peak (which coincides with the overall peak), the workforce drops substantially. From year 10 to completion, the workforce is forecast to be well below 2,000 workers (including the operational workforce). During this stage, associated development sites would be deconstructed and site restoration undertaken. The operational workforce peaks (at 900), meaning that the construction-related workforce accounts for around 1,000 workers at this stage.

2.1.3 The following schematics show:

- The overall workforce profile by role, as shown in **Figure 2.1**.
- The build-up and ramp-down of NHB workers, who would require temporary accommodation in the local area, as shown in **Figure 2.2**.

2.1.4 As shown in **Figure 2.1**, the construction workforce is anticipated to reach a peak of up to 7,900 workers. Construction workforce numbers would then fall gradually over time until the end of the main construction phase. The overall estimated profile for the construction workforce – along with profiles for the main breakdown of worker categories – is also shown in **Figure 2.1**.

2.1.5 At the peak of construction, it is estimated that of the 7,900 construction workforce, approximately 5,880 would be NHB and seeking accommodation in the local area. This represents the maximum level of accommodation demand that the Sizewell C Project is expected to generate.

2.1.6 For several years either side of peak construction, accommodation demand generated by the project is expected to be less than this, but the demand is still expected to be substantial. The estimate of the number of NHB workers who would require accommodation in the local area over the construction phase of the project is shown in **Figure 2.2**.

2.1.7 This level of demand for accommodation represents the context for SZC Co.'s **Accommodation Strategy** and its proposals.

2.2 Workforce characteristics

2.2.1 **Technical Note 2: Demographic Benchmarks and Workforce Characteristics,** provided in **Appendix 9B, Volume 2, Chapter 9** of the **ES,** provides information on the anticipated characteristics of the NHB workforce. While the construction sector has changed in recent years – and significantly since the construction of Sizewell B, it still consists substantially of men in the 20–49 age range.

2.3 Accommodation choices and use of accommodation

2.3.1 The types of accommodation that the NHB workforce would seek to live in would depend on factors such as the nature of their role on the project including their skill level, income, and length of contract, which would vary considerably between roles.

2.3.2 For management and professional staff, and operational staff (some of who would be on-site during the peak of construction), there would be a higher propensity to buy property in the local area. These roles would typically be higher paid and longer term, so people might choose to move their families to the area.

2.3.3 The majority of workers would be either in civil or mechanical, electrical, and heating roles. These roles are more likely to be shorter term and transient, with skills required for specific packages within the build meaning contracts may last from a few months to a few years. As such, these workers would be more likely to move to the area for shorter periods, requiring greater flexibility of accommodation, and would be more likely to return to their permanent homes between working periods/shift cycles than bring their families and settle in the area.

2.3.4 The estimated split between types of accommodation sought at peak is based on residual demand following embedded mitigation (project accommodation at the on-site accommodation campus and caravan park), experience at Sizewell B, and more recent monitoring information from Hinkley Point C, combined with estimates about the types of roles by skill, contract type and earnings.

2.3.5 At the peak of construction, SZC Co. predicts that:

- Project accommodation – the accommodation campus and caravan park – could accommodate up to 3,000 workers at full capacity (assuming average 1.5 workers per caravan);
- Approximately 880 workers are anticipated to have bought homes and live in owner-occupied sector property[1];

[1] With this range depending on the project's overall level of local recruitment at peak (which affects the residual demand from the NHB work force by accommodation type).

- Approximately 800 workers would be living in accommodation in the tourist sector – predominantly caravans and self-catering accommodation relatively close to the site (depending on cost and availability); and

- Approximately 1,200 workers would have secured PRS tenancies (similar to levels of private renting during the peak of Sizewell B).

2.3.6 Experience from Sizewell B and Hinkley Point C suggests that there is also a significant market in renting of spare rooms, for example using third party sites such as Gumtree, Facebook, or SpareRoom.com. This is known as 'latent accommodation' and is likely to also play a role at Sizewell C. The assessment does not include any assumed uptake of latent accommodation by NHB workers so, as a result, the above numbers are considered to be conservative.

2.3.7 SZC Co. cannot directly control the accommodation choices of the workforce; many workers would not be directly employed by SZC Co. and cannot be compelled to live in any given location. However, SZC Co. would assist workers in finding suitable accommodation, both in terms of its type and location.

2.3.8 SZC Co. would be able to take account of the availability of accommodation and any other relevant local factors (such as the availability of schools or places of worship) in helping contractors and workers to find accommodation. The proposed Accommodation Management System is explained further in **section 6** of this strategy.

2.4 Distribution of the workforce (accommodation uptake)

2.4.1 **Technical Note 3: Spatial Distribution of the Workforce**, provided in **Appendix 9C, Volume 2, Chapter 9** of the **ES** sets out information on where SZC Co. thinks that the NHB construction workforce would be likely to live at the peak of construction.

2.4.2 The precise locations that workers choose to live in would be dependent on a number of factors, including their duration of stay, the price of accommodation, access to their permanent homes, proximity to park and ride facilities and the main development site, and access to amenities such as sport and leisure, and, in the case of families, schools.

2.4.3 SZC Co. has developed a gravity model to estimate the locations of workers, both HB and NHB, by type of accommodation. Based on typical travel times for construction workers in the east of England, this assumes that people already living in the local area would be willing to travel up to

around 90 minutes each way in order to work on the construction of Sizewell C – this area is referred to as the Construction Daily Commuting Zone or CDCZ. Where workers are moving to the local area in order to work on the Sizewell C Project, it is assumed that they would want to move closer to the site. Therefore, a 60-minute zone has been used to assess the availability of local accommodation. These travel times assume workers are travelling either via the park and ride sites or using direct bus services. A full explanation of the gravity model is set out in the **Transport Assessment** (Doc Ref. 8.5).

2.4.4 **Figure 2.3** shows the scale of the 60-minute zone, based on ward boundaries.

2.4.5 For NHB workers, the model has two elements – a weighting based on the amount of accommodation in the area and one based on the distance from the site. The model assumes that:

- workers are more likely to live in areas where there is more accommodation available; and
- they are also more likely to choose locations with shorter travel-to-work times.

2.4.6 This means workers are estimated to cluster in more urban areas (where there is more accommodation), especially those with quick access to the main development site. As a result, relatively few workers are expected to be located towards the extremities of the 60-minute zone, especially in rural areas with relatively little accommodation.

2.4.7 The assessment and **Accommodation Strategy** is therefore based on the 60-minute catchment.

2.5 Local demographics and accommodation

a) Population and migration

2.5.1 The scale of the construction workforce, and the number of NHB workers who would seek accommodation in the local area, needs to be seen in the context of wider local demographics. The workforce would be relatively small in comparison to the existing population (estimated in 2017, Office of National Statistics (ONS) mid-year estimates) of the county i.e. Suffolk (757,000); district i.e. East Suffolk (246,900) level; and across the 60-minute area (316,700).

2.5.2 The existing population is relatively dynamic and mobile. Every year around 4% of people move either within, to, or from the county (Suffolk) or district (East Suffolk) based on ONS Internal Migration Flow data (2016/17). **Table 2.1** shows significant population flows each year in and out of the 60-minute zone.

Table 2.1: Internal migration flows (within the UK): immediate districts

Area	Migration into Area	Migration from Area	Migration Net Flow
Districts			
Great Yarmouth	4,286	4,132	150
South Norfolk	9,899	7,369	2,530
East Suffolk	12,416	9,980	2,440
Mid Suffolk	6,063	5,219	840
Ipswich	6,593	7,822	-1,230
Babergh	5,430	4,730	700
Wider Scales			
Norfolk	31,566	26,131	5,440
Suffolk	26,814	23,359	3,460
East of England	176,465	167,656	8,810

Source: ONS, 2016–17.

2.5.3 These flows are not uniform across housing tenures. Households in owner-occupied sector family housing are much less likely to move compared to households in the PRS.

2.5.4 Two of the key sectors in the Suffolk economy are agriculture and tourism, both of which rely extensively on a seasonal and migratory workforce which moves in and out of the area.

2.5.5 Suffolk has a substantial tourist accommodation industry. Most of this activity occurs at, or close to, the coast, within the 60-minute commuting area likely to attract NHB workers. Relative to tourist accommodation activity, demand for accommodation from the Sizewell C workforce seeking accommodation in the private market would be relatively small, at around half a million nights per year around the peak (based on the average number of workers during the peak year) compared to 2.5 million nights spent by tourists (Ref. 1.2).

2.5.6 The fact that there is already such dynamism and mobility in the local population means the local area is able to cope with the regular, temporary increases in workers for outages at the existing Sizewell B station.

Outages for Sizewell B currently have a substantial NHB workforce of around 850 workers and last for around six weeks. These workers have been absorbed by the local accommodation market without significant difficulties.

2.6 Stakeholder engagement

2.6.1 SZC Co. has engaged regularly with Housing Officers at ESC on issues regarding housing need and vulnerability, capacity and churn/change in the stock, the role of the PRS, SZC Co.'s proposals for project accommodation, and the scope of impact assessments and development of mitigation. This engagement is summarised in **Table 2.2**.

2.6.2 It should be noted that ESC was formed following the merger of the former Suffolk Coastal District Council (SCDC) and Waveney District Council (WDC) in 2019. Reference is made to ESC throughout this document for all engagement with SCDC and WDC, including pre-merger, but reference is made to the individual former districts where data is reported at that spatial scale.

Table 2.2: Record of engagement between SZC Co. and local authorities regarding housing / accommodation issues

Date	Meeting Summary
26 February 2015	Initial discussion about data on the PRS – including rent levels, vacancy and turnover, potential demand from Sizewell C workers, current housing demand and pressures, and the theoretical approach to a Housing Fund to mitigate effects.
9 June 2015	Summary of household characteristics (demographics) in the PRS and local-level review, discussion on housing benefit issues and policy changes, population projections and potential options for mitigation of any impacts of Sizewell C workers on the housing market.
12 June 2015	Meeting to discuss potential effects of the Sizewell C Project on people in receipt of housing benefit living in the PRS and to consider the implications of population projections on future demand. Meeting also discussed the potential for a Sizewell C Project-provided and managed caravan park at the main development site (LEEIE) plus use of existing caravan accommodation by workers.
28 July 2015	Outline and presentation/discussion of information on housing need in SCDC and WDC, and in Leiston more specifically to identify key issues for housing need and introduce the potential effects of the Sizewell C workforce. Initial discussion of empty homes data (following recent SCDC/WDC review), and current schemes to bring back into use.

Date	Meeting Summary
7 October 2015	Focus on issues associated with the PRS in Leiston (as the area which would likely have the greatest capacity effects from Sizewell C workers at peak), with the intention that this could be used as a case study to subsequently apply to wider areas.
8 April 2016	Meeting to discuss potential LEEIE caravan park in more detail. Also covered shared use of existing sites by tourists / workers; possible expansion of existing sites and feedback to the Council following meetings with local caravan accommodation providers.
19 May 2016	Discussion considering working note on potential local effects on private rented housing in Leiston. Discussion on changes to housing services and the effects of legislation since previous meeting – including increase in presentations and resource demand of Homelessness Reduction Act 2017.
29 June 2018	Meeting to discuss any changes that may have occurred in terms of delivery of housing services related to new legislation or economic and political change, to discuss monitoring of effects and start to develop potential measures for the Housing Fund for consultation (at Stage 2). Also covered initial Council feedback on LEEIE caravan park layout send ahead of meeting. Council advised that estimated occupation levels / density proposed were a little high (NB design subsequently amended to reflect this). Agreed that "One-stop-shop" meeting with caravan site owners / local planners / licensing to brief potentially interested site owners would be helpful.
18 March 2019	Meeting to discuss Stage 3 responses from local authorities, and to set out early indicative potential effects of a higher workforce (as introduced at Stage 3). Comparison of effects and consideration of mitigation activities and effectiveness at Hinkley Point C. Consideration of potential sites in Leiston that could be supported by SZC Co.
13 June 2019	Meeting to introduce the methodology for impact assessment (e.g. considering availability and affordability in tourist accommodation, and 'frictional vacancy' in rented sectors), and to develop thinking on project accommodation and Housing Fund measures.

2.7 Housing policy/strategy in East Suffolk

2.7.1 In addition to detailed information on local housing gained through engagement, SZC Co. has also had regard to information, policies, strategies, and business plans that have been published by local authorities and public bodies.

a) East Suffolk Housing Strategy (2017–2023)

2.7.2 ESC's Housing Strategy (Ref. 1.3) sets out what it identifies as the key challenges for housing: primarily the supply of housing, affordability, homelessness, and meeting the changing needs of the population.

2.7.3 It notes that there are approximately 13,500 affordable rented homes across Suffolk Coastal and Waveney and that increasing the supply of affordable homes is the main priority for the strategy. The strategy makes a commitment to increase the number of council-owned affordable homes from 4,479 to more than 5,100. It emphasises plans to increase the number of affordable homes in Waveney by 150 units per annum and in Suffolk Coastal by 100 units per annum. This includes commitments to bring empty properties back into the housing market by all means, including using compulsory purchase where required.

2.7.4 The strategy notes that most housing demand is in urban areas, but there remains a small demand for affordable housing in rural areas. There is also an identified need for more specialist accommodation for specific housing needs, and to ensure that properties are well maintained and meet safety standards. This includes improving the energy efficiency ratings of homes and ensuring that these homes meet fire and other safety standards.

b) East Suffolk Private Sector Housing Strategy (2019–2023)

2.7.5 ESC's Private Sector Housing Strategy (Ref. 1.4) recognises that East Suffolk has an array of areas of relative affluence and deprivation. Some wards are within the 10% most deprived in the country, and these areas are the focus for the strategy.

2.7.6 The strategy introduces a number of recommendations for the housing market, including:

- Ensuring that houses are healthy and safe places to live – ESC has adopted an enforcement protocol to assist with consistent and proportional legal action.
- Ensuring that the housing stock in the district does not become dilapidated – some homeowners are not in the financial position to carry out maintenance for their properties. ESC has formulated a grant policy which is available across all parts of the district. The policy provides financial support to those owners who cannot afford to maintain their own homes.
- Empty homes are a problem within the district. In 2018, 1,130 privately owned homes in East Suffolk were empty for at least six months.

Empty properties are a wasted resource that could help alleviate a housing shortage. ESC has limited legal powers to deal with empty homes but do have a duty to deal with unsafe homes linked to poor housing standards.

- Supplying houses that are adapted for residents with disabilities – a means-tested grant will be provided to those who cannot afford to adapt their homes for specialist needs.
- Some privately rented properties are let to people from several different families or households - known as houses in multiple occupation (HMOs). HMOs may carry a health and safety risk. Health and safety checks and awareness sessions have been conducted and content published to improve the safety of these properties.

c) East Suffolk Housing Revenue Account Business Plan (2018–2048)

2.7.7 ESC's Revenue Account Business Plan (Ref. 1.5) includes plans for surveying the condition of housing stock and improving current stock through measures such as increasing the energy efficiency of the properties, as well as developing new homes in the borough in line with the East Suffolk Housing Strategy. The aspirational target seeks to build 100 new council homes a year for five years.

2.7.8 It notes that retired living schemes are unpopular in the district. These are homes provided to retirees that are owned by ESC. A review of this scheme is underway to either increase funding to improve the scheme or to seek alternative schemes to provide homes for the elderly population, which in turn would enable more efficient use of existing homes.

2.7.9 The fire safety and security of the housing stock is an important issue that is raised in the strategy.

d) East Suffolk Homelessness and Rough Sleeping Strategy (2019–2024)

2.7.10 ESC's Homelessness Strategy (Ref. 1.6) is focused on preventing homelessness by increasing accommodation options and supporting vulnerable households.

2.7.11 The strategy includes a list of actions to tackle homelessness such as partnering organisations including charities, ministries and other organisations:

- Continuous monitoring of the time people spend in temporary accommodation.
- Continuing to publish data on waiting times for social housing.
- Ensuring that there is an adequate supply of emergency and self-contained accommodation, particularly in the south of the district.
- Investigating options for ensuring that there is an adequate supply of temporary accommodation.
- Seeking to develop more move-on accommodation – specifically HMO type units across East Suffolk where there is a shortage.
- Working with 'Gateway to Homechoice' partnership to review local connection residency criteria.
- Consulting on any plans to change policy that would have a significant impact on households on the register.
- Participating in a broad review of housing demand to ensure that appropriate housing is developed to meet the needs of the district in line with the East Suffolk Housing Strategy.

e) East Suffolk Tenancy Strategy (2019)

2.7.12 ESC's Tenancy Strategy (Ref. 1.7) sets out that new tenures in the district should be affordable and sustainable, and that ESC will adopt a benchmark for affordability. The intention is that housing in the Waveney district should be affordable for full time workers on a typical local income.

2.7.13 A number of measures are included in this strategy seeking to match demand to supply, including:

- Converting social rents to affordable rents – converting some of the existing housing stock to affordable rents to allow rental providers to deliver more affordable housing.
- Promoting fixed term tenancies – "where providers use these new flexibilities, they will offer tenancies for a fixed term of at least five years, except for in 'exceptional circumstances' where they may offer a tenancy of between two and five years."
- Providing housing options advice to households at different stages of their lives, and advising of the best choice for them based on their current circumstances, and the implications of exercising that choice.

- Maintaining and enhancing mobility – working with rental providers to ensure that best use is made of the social housing stock, including managing overcrowding and under occupation. The strategy is intended to manage the potential negative impact of affordable rents and fixed tenancies such as immobility, and to ensure that the housing stock is used effectively.
- Disposals of homes owned by registered providers – ESC would like registered providers to discuss with them before deciding on whether to dispose of a property, and want to be involved from an early stage to discuss alternative options such as ESC acquiring the property.

3 Objectives and principles

3.1.1 In developing its **Accommodation Strategy**, SZC Co. has had regard to:

- its operational requirements and overall vision for the Sizewell C Project, which includes optimising the benefits of the project whilst minimising its impacts as far as practicable;
- the local authorities' and other public service providers strategies and policies; and
- responses to consultation.

3.1.2 As a result, the following overarching objectives have been developed:

- To develop a balanced strategy, making use of existing accommodation and supporting businesses and accommodation providers whilst seeking to avoid displacement of local residents or tourists.
- To meet the operational needs of the Sizewell C Project by providing good quality accommodation of a type which would be attractive and affordable to workers and meet the requirements of contractors.
- To ensure that all project accommodation is of a good standard, with access to high quality facilities and amenities (e.g. sports facilities, catering, laundry services), and is appropriately priced, safe, secure and well-managed.
- To avoid or reduce adverse impacts on local communities and to ensure that workers, in all forms of accommodation have access to information and maintain high standards of conduct, especially in their interaction with the local community.

- To ensure any potential adverse impacts of the development on local accommodation are assessed, and that appropriate mitigation measures are put in place if necessary.

4 Existing local accommodation

4.1 Types of accommodation

4.1.1 There are a number of good reasons for using existing accommodation sources to meet a significant proportion of the demand created by the NHB workforce:

- There is potential to deliver both direct economic benefits to local accommodation providers and indirect (spin-off) benefits for other businesses in the local area.
- There is evidence from the responses to SZC Co.'s engagement activities and consultations that there is interest from local providers to offer accommodation to the construction workforce.
- There is evidence that some local accommodation sources have significant spare capacity at certain times of the year (notably tourist accommodation during off-peak holiday periods) which could be in-part filled by construction workers.
- Some workers would prefer to live in local tourist or private rented accommodation rather than living in an SZC Co. campus or caravan park.
- The use of existing accommodation sources would be required prior to the completion of the caravan park (expected at the end of the first year of construction activity, when the NHB workforce is approximately 750), and accommodation campus (expected within the first three years of the Sizewell C Project, when the NHB workforce may reach c.2,500).
- The demand created by the Sizewell C Project should help to 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.

4.1.2 In delivering the **Accommodation Strategy**, SZC Co. recognises that it needs to avoid using existing accommodation sources beyond their

capacity or in ways which would have detrimental impacts on the local tourism sector or local communities.

4.1.3 The temporary campus and caravan accommodation proposed by SZC Co. would help to take the pressure off existing accommodation supply, as well as providing significant operational benefits for SZC Co. and its contractors. These benefits are discussed further in **section 5**.

4.1.4 SCZ Co. has examined in detail the scope for using existing accommodation to meet the additional demand created by the Sizewell C Project.

4.2 Tourist accommodation

a) Stock in the tourist sector

4.2.1 There is a large supply of tourist sector accommodation across the 60-minute area, most of which is concentrated in urban areas or within coastal areas. The stock of accommodation in the area is diverse in terms of the type of service provided and the price per night/booking.

4.2.2 In 2014, EDF Energy was provided with a detailed database of registered tourist accommodation by Visit East Anglia, which set out the location, sector and size of tourist accommodation across the area. This data allows mapping of accommodation at a very local scale (which other sources do not), though it is noted that it is now eight years old, and may not include all accommodation in the tourist sector (for example if providers were not registered with Visit East Anglia at the time). This dataset is used for the gravity model. It is considered to be an underestimate of the overall supply today.

4.2.3 **Table 4.1** sets out the stock of tourist accommodation (by bedroom) using the Visit East Anglia dataset:

Table 4.1: Bedspaces in tourist accommodation – Visit East Anglia data

Geography	Total	Serviced	Non-serviced		
		Hotels and similar	Self-catering	Caravan and campsites	Other e.g. Holiday Parks, Hostels
East Suffolk District	**19,670**	2,526	3,644	4,151	9,350
60-minute Area	**26,276**	6,255	4,300	5,645	10,076

Source: Visit East Anglia, 2012.

4.2.4 Data is also produced at a local authority scale by Visit Britain as part of their Accommodation Stock Audit (latest data 2016) (Ref. 1.8). While this cannot be used to inform the gravity model (which requires local-level data

to run), it provides some context for the wider stock by sector. It should be noted that due to different categorisation of accommodation, the two datasets are not directly comparable.

4.2.5 **Table 4.2** summarises the overall stock by sector (bedspaces) for Suffolk (county) and East Suffolk (district).

Table 4.2: Bedspaces in tourist accommodation – Visit Britain data

Geography	Total	Serviced	Non-serviced		
		Hotels and similar	Holiday dwellings	Tourist campsites	Other collective accommodation
East Suffolk district	**11,005**	4,168	4,262	2,512	63
60-minute Area	**20,620**	12,233	5,302	2,989	96

Source: Visit Britain, 2016.

b) Occupancy, availability (capacity) and affordability in the tourist sector

4.2.6 SZC Co. is aware that in the summer peak a significant number tourists visit the Suffolk Coast. The use of tourist accommodation by workers may have adverse economic impacts if tourists are displaced from accommodation. For off-peak times of the year, the use of tourist accommodation by construction workers could have beneficial economic effects, maintaining local spend and employment in these areas. At these times, accommodation would also be less expensive, and therefore more attractive to workers.

4.2.7 Room occupancy rates for tourist accommodation are produced monthly by Visit England at a regional scale through the England Occupancy Survey (Ref. 1.9). A review of this information for the east of England region from 2016–19 suggests occupancy ranges from 63% in the winter (January) to 85% in the peak of summer (July/August). Occupancy tends to exceed 80% for 4–5 months of the year.

4.2.8 Applied to the above datasets, this suggests that:

- There may be between 1,600 (peak) up to 7,300 (off peak) unoccupied bedspaces in East Suffolk district based on the data sources and assumptions set out above;
- There may be between 3,100 (peak) and 9,700 (off peak) unoccupied bedspaces in the 60-minute area based on the data sources and assumptions set out above.

4.2.9 The Suffolk Coast Tourism Strategy (2013–2023) (Ref. 1.10) notes that the average (2012) bedspace occupancy ranged from 40% per annum for hostels through to 58% for hotels, self-catering accommodation and camping and caravan sites.

4.2.10 SZC Co. has developed area-wide assumptions on the range of availability and affordability of accommodation for construction workers, to identify indicative effects on capacity based on the price of accommodation and the accommodation allowance available to NHB workers under the Construction Industry Joint Council Working Rule Agreement (currently £40.76 per night at the time of this assessment) (Ref. 1.11).

4.2.11 These indicate that a significant amount of tourist accommodation would not be affordable to Sizewell C construction workers. By sector, SZC Co. has assumed that:

- 85% of serviced accommodation would not be affordable for workers;
- in most areas, 90% of self-catering accommodation would be affordable to workers (though SZC Co. notes through engagement with The Suffolk Coast Destination Management Organisation that there is likely to be considerable local variation in price between areas);
- while all caravan accommodation is likely to be affordable, there are planning restrictions for the year-round use of caravans, some providers would not want to accommodate workers or would want to limit the proportion of stock occupied by workers – engagement with ESC suggests this could reduce availability to workers by 50%.

4.2.12 **Table 4.3** applies these discounts to the overall stock identified in **Table 4.1**, with the effect of reducing the overall stock that is anticipated to be available and affordable to workers by over 60%:

Table 4.3: Bedspaces in tourist accommodation – affordability / availability discounts applied

Geography	Total	Serviced		Non-serviced	
		Hotels and similar	Self-catering	Caravan and campsites	Other e.g. Holiday Parks, Hostels
Local Wards					
Leiston	160	4	8	148	–
Saxmundham	233	4	71	158	–
Snape	161	2	136	23	–

Geography	Total	Serviced		Non-serviced	
		Hotels and similar	Self-catering	Caravan and campsites	Other e.g. Holiday Parks, Hostels
Yoxford	335	20	177	139	–
Aldeburgh	1,049	51	725	272	–
Districts					
Great Yarmouth	3,363	563	342	2,458	–
South Norfolk	529	142	299	88	–
East Suffolk	5,734	379	3,280	2,076	–
*Suffolk Coastal**	3,329	193	2,003	1,133	–
*Waveney**	2,405	186	1,277	943	–
Mid Suffolk	574	120	354	100	–
Ipswich	148	148	–	–	–
Babergh	507	175	315	17	–
Other Scales					
60-minute Area	7,631	938	3,870	2,823	–

Source: Visit East Anglia, 2012.

4.2.13 This shows that a significant amount of tourist accommodation would be affordable to Sizewell C construction workers. Only hotels and some self-catering accommodation in the peak of the season would not be affordable.

4.2.14 In the summer peak a significant number of these spaces would normally be occupied by tourists and displacing them might have wider adverse impacts. However, accommodation providers may prefer to let their space to workers so it is not possible to forecast the extent to which supply might be limited in the peak tourist season by "normal" levels of tourist occupancy. Additionally, the supply of tourist accommodation assessed as available and affordable to Sizewell C construction workers is a modest subset of the total rated accommodation in the area.

4.2.15 The figures outlined in the tables above currently do not include "Holiday Parks" or "Holiday Villages" given a level of ambiguity over their function, operation and restrictions on use. It has been noted that some of these facilities may be suitable for construction workers (and were used during the construction of Sizewell B), and may form an additional part of the accommodation supply in practice. The gravity model excludes these in order to take a conservative approach to supply.

c) Potential effects on the tourist sector

4.2.16 It is anticipated that at the peak of construction there would be approximately 800 workers seeking accommodation in the tourist sector within the 60-minute area.

4.2.17 As set out above, it is estimated that there may be around 9,700 bedspaces available (unoccupied) in the off season and around 3,100 during peak months across the 60-minute area (without discounts applied for affordability / availability).

4.2.18 On this basis, workers seeking accommodation have the potential to generate income by using tourist accommodation that would otherwise be unoccupied.

4.2.19 However, SZC Co. notes that there are critical sensitivities within the market in terms of the location of tourist accommodation – much of which is located towards the coast – its popularity and potential local differences in occupancy rates, the tourist sub-sectors accommodation is available in, and its affordability to workers.

4.2.20 This is most likely to be relevant in terms of the local distribution of accommodation, the type of accommodation, and its affordability. **Table 4.4** sets out the number of workers looking for tourist accommodation in areas close to the site, set against the available and affordable stock:

Table 4.4: Workforce estimate in context of available and affordable tourist accommodation stock and capacity in wards closest to the site

Ward	Workers in Tourist Accommodation at peak	Total beds	% of total stock used by workers	Available/ Affordable beds	% of available/ affordable stock used by workers
Aldeburgh	462	1,691	27%	1,049	44%
Leiston	135	333	41%	160	84%
Yoxford	73	605	12%	335	22%
Saxmundham	55	423	13%	233	24%
Snape	21	411	5%	161	13%
Walberswick and Wenhaston	16	373	4%	263	6%
Southwold and Reydon	13	1,015	1%	833	2%
Orford and Tunstall	8	205	4%	126	6%

Ward	Workers in Tourist Accommodation at peak	Total beds	% of total stock used by workers	Available/ Affordable beds	% of available/ affordable stock used by workers
Kessingland	5	3,902	0%	1,040	0%
Hollesley with Eyke	2	274	1%	151	1%

4.2.21 This suggests that:

- Workers in Aldeburgh and Leiston may be likely to seek tourist sector accommodation equivalent to around 27% and 41% of the affordable stock respectively. When discounting for availability/affordability, workers may be anticipated to seek to occupy around 44% of stock available and affordable to them in Aldeburgh, and 84% in Leiston. This may result in some effects on the accommodation sector in these locations at peak, prior to mitigation, but noting the inherent flexibility and market responses that have not been accounted for here (i.e. the potential for demand to influence supply, leading to additional conversions to Airbnb, for example).
- Elsewhere, some effects on supply at peak may occur in Yoxford, Saxmundham and Snape, though in the context of the overall stock and type of accommodation, these effects are likely to be minor and short-lived.

4.2.22 Some concern has been expressed through consultation around the potential displacement of tourists who have higher average daily expenditure than workers.

4.2.23 It would be a commercial decision for accommodation providers to decide whether to let accommodation to workers or tourists.

4.2.24 Additionally, private providers would be responsible for ensuring that occupants comply with any relevant planning or other regulatory restrictions on the use of tourist accommodation.

4.3 Private rented accommodation

a) Stock in the private rented sector

4.3.1 The 2011 Census identifies that there are over 99,000 private rented bedrooms in the 60-minute area, within 42,000 homes. The distribution of these bedspaces across the area varies substantially, with a greater proportion (of all bedspaces) in urban areas.

4.3.2 **Table 4.5** sets out the total number of private rented bedspaces within the 60-minute area and East Suffolk district (formerly Suffolk Coastal and Waveney Districts) specifically as at the 2011 Census:

Table 4.5: Homes and bedrooms in PRS properties in East Suffolk district and the 60-minute area based on 2011 Census data[2]

Geography	PRS Stock (2011 Census)	
	Homes	Rooms
East Suffolk District	16,295	38,755
60-minute Area	42,030	99,033

4.3.3 The PRS has changed substantially since Census data was collected in 2011. Although there is no detailed local-scale data to update the Census, trends can be estimated from a number of sources including:

- The English Housing Survey (EHS) (Ref. 1.12) – which estimates that in the East of England, the PRS has grown by approximately 30% since the 2011 Census – now making up around 18.2% of all homes (compared to 14.7% in 2011);
- The Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) Volume 2 (2017) (Ref. 1.13) – which states that the PRS accounts for 18.1% of overall stock in the HMA in 2018.

4.3.4 By applying the increases evidenced above, it is reasonable to assume that the 2011 Census underestimates the stock of PRS homes and rooms across East Suffolk and the 60-minute area by up to 11,600 and 29,700 bedrooms respectively.

b) Turnover/churn and vacancy in the private rented sector

4.3.5 The PRS is inherently flexible and fast-moving, responsive to significant changes in demand, and variable depending on a number of factors with pockets of high and low vacancy rates likely to exist but very difficult to quantify or monitor.

i. Vacancy

4.3.6 The Ipswich Housing Market Area SHMA Update (2019) (Ref. 1.14) states that the vacancy rate in Suffolk Coastal is around 8.3%. This is defined

[2] LC4405EW - Tenure by household size by number of bedrooms

using 2011 Census data for homes that are empty and those that are used as second homes. A vacancy rate of 6.9% is presented for Waveney within the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment Volume 2 (2017) (Ref. 1.13).

4.3.7 However, there is a significant difference between tenures especially where the market requires a certain level of vacancy to operate efficiently. Average (national) vacancy rates in the PRS over the last ten years, as recorded by the English Housing Survey, suggest vacancy rates of around 10.3%. This includes properties that are empty or available to let, or away from the market for short, medium, or long-term.

ii. Turnover/churn

4.3.8 Using English Housing Survey data referenced above, and Census data on PRS turnover at ward-level, some parameters can be established.

4.3.9 Data from the 2011 Census identifies that, across all tenures in Suffolk Coastal:

- Around 1,700 new households moved into the district in that year.
- Around 1,300 households moved out of the area.
- Around 2,100 households already in the district moved to a new home elsewhere in the district.

4.3.10 In Waveney, the same data shows:

- Around 1,100 new households moved into the district in that year.
- Around 800 households moved out of the area.
- Around 2,400 households already in the district moved to a new home elsewhere in the district.

4.3.11 These figures are influenced by the type of accommodation households occupy, with significant differences between the owner-occupied sector, social rented and PRS.

4.3.12 The English Housing Survey sets out that average annual churn rate in the PRS (households moving within, in or out of the sector in a given year)

averaged around 31.8% over the last 10 years in England. This equates to 2.7% of all properties turning over in each month.

4.3.13 Evidence from the 2011 Census[3] indicates an annual churn of around 29% of PRS households in Suffolk Coastal and 27% in Waveney (those households in the districts in the PRS who moved in the previous year), which appears about average for districts in the UK.

4.3.14 In Suffolk Coastal, around 8.2% of PRS households moved into dwellings in the district in 2011, and in Waveney around 6% of PRS households moved into dwellings in the district in 2011.

4.3.15 Average turnover of the PRS in East Suffolk wards in 2011 (Census) was around 35% (or 2.8% per month).

iii. Frictional and operational vacancy

4.3.16 Given the levels of churn in the market, it is possible that spare capacity could be used, but that this would need to be seen in the context of the effect on current tenants and the wider role of the PRS, and would be sensitive to local characteristics (e.g. stock, type, rent levels and accessibility).

4.3.17 Using the English Housing Survey dataset, the average PRS vacancy rate over the last 10 years is 10.3%, which suggests a maximum spare capacity of up to 7.5% on average across wards in East Suffolk once the average monthly turnover rate of 2.8% is subtracted. As such, this would be the absolute minimum vacancy required for the market to turnover.

c) Potential effects on the private rented sector

4.3.18 The Sizewell C Project may result in NHB workers looking to rent property in the PRS within 60-minutes of the main development site at the peak of construction.

4.3.19 These workers would look to find accommodation for a range of short-medium timescales, with a preference to be relatively close to the site, and to reduce costs as far as possible while maximising the value of their

3 This data only refers to 'wholly moving households' i.e. one where all members of the household have moved from the same address. A partly moving household is where one or more members of the household have moved in the last year but not all members have moved from the same address. Partly moving households in the PRS sector accounted for an additional 8.7% of all PRS households. Overall, 4.4% of all households in Suffolk Coastal were formed in 2011 as a result of partially moving. These are additional to wholly moving households.

subsistence and accommodation allowance (£40.76 per night, based on the 2018 Working Rule Agreement from the Construction Industry Joint Council referenced above, at the time of this assessment). Demand from workers would therefore likely overlap with local residents - especially within the lower quartile of market rents, and within smaller (1–2 bed) properties or HMOs.

i. Effects on the overall stock

Macro-scale effects

4.3.20 At the peak of construction, it is estimated that approximately 1,200 workers would be living in PRS accommodation across the 60-minute area. The PRS provides options for construction workers in medium-term roles, as generally the shortest period for an assured shorthold tenancy is six months.

4.3.21 As set out above, there is a significant stock of homes and bedspaces in the sector – in 2011, there were over 99,000 bedspaces in the area, and based on national and regional average increases this may have since risen to over 128,000.

4.3.22 As such, Sizewell C workers are likely to require around 1.2% of all bedspaces in the area. This is well within the overall calculated level of frictional vacancy within the sector, and is therefore expected to be imperceptible at that scale.

4.3.23 **Table 4.6** sets out the scale of workforce likely to be seeking PRS in the context of overall stock, vacancy and churn:

Table 4.6: Macro-level effects – NHB workers seeking PRS accommodation in the 60-minute area

Construction Workers at Peak		Workers
(a)	Total NHB workers excl. project accommodation (campus and caravans)	2,884
(b)	Of which seeking PRS accommodation	1,200
PRS Stock and Characteristics		
(c)	Total stock of PRS Bedrooms (2011 Census)	99,033
(d)	Total stock of PRS Bedrooms (2019 estimate based on SHMA and EHS)	128,743

Construction Workers at Peak		Workers		
Vacancy Rates		*%*	*2011 Census*	*Potential including growth since 2011*
(e)	Vacancy rates (National – EHS 10-year average)	10.0%	10,200	13,261
(f)	Vacancy rates (Suffolk Coastal – SHMA)	8.3%	8,220	10,686
(g)	Vacancy rates (Waveney – SHMA)	6.9%	6,833	8,883
Turnover Rate		*2011 (Census) Turnover rate in PRS in East Suffolk*		
(h)	Monthly turnover in the PRS	2.8%		
Output		*% Spare*	*Est 'spare' capacity*	
(i)	Potential 'spare' capacity (est. lower range based on 2011 Census)	4.1%	4,060	
(j)	Potential 'spare' capacity (est. upper range based on potential PRS growth since 2011)	7.5%	9,656	

4.3.24 Although at this wide scale effects are negligible, workers are likely to concentrate close to the site and this has been accounted for in ward-level modelling of the workforce by sector within the Gravity Model, provided in **Technical Note 3: Spatial Distribution of the Workforce – Appendix 9C of Volume 2** of the **ES** (Doc Ref. 6.3).

Local effects

4.3.25 Workers are more likely to seek accommodation close to the site - in order to limit their travel time - and to concentrate where there is a substantial amount of accommodation available. The gravity model predicts that workers would tend to live in areas close to the site with accommodation, for example in Leiston, Aldeburgh, Yoxford, or Saxmundham.

4.3.26 The extent to which there is spare capacity within the current PRS stock can be identified based on national data on vacancy, and national and local data on turnover of PRS households.

4.3.27 **Table 4.7** sets out the number of workers anticipated to seek PRS accommodation in the ten wards closest to the site, in the context of the overall stock and the frictional vacancy at ward scale. This uses a workforce profile peaking at 7,900 workers – this is a precautionary approach to ensure that appropriate mitigation can be applied.

Table 4.7: Workforce estimate in context of PRS stock and capacity in wards closest to the site

Ward	Workers at Peak in PRS	PRS beds (2019 estimate)	% of PRS bed stock taken	Frictional vacancy est.[4]	Exceedance of frictional vacancy	% of frictional vacancy
Leiston	392	1,461	27%	117	275	336%
Aldeburgh	105	706	15%	53	53	200%
Saxmundham	87	946	9%	67	20	130%
Rendlesham	54	957	6%	74	-20	72%
Yoxford	40	424	9%	32	-8	125%
Snape	31	456	7%	33	-3	92%
Halesworth	24	595	4%	48	-24	50%
Orford and Tunstall	26	966	3%	72	-46	36%
Sutton	18	1,262	1%	103	-84	18%
Framlingham	16	1,100	1%	78	-62	20%

4.3.28 This analysis highlights that:

- In Leiston, Aldeburgh, Saxmundham, and Yoxford the demand for PRS from the Sizewell C workforce is anticipated to exceed the frictional vacancy. The most significant effects are identified in Leiston and Aldeburgh.
- In Rendlesham and Snape, the demand for PRS from the Sizewell C workforce is anticipated to account for between 50% and 100% of the frictional vacancy in the peak year – this is considered within the capacity required for the sector to operate and is considered a low risk.
- In Halesworth, Sutton, Orford & Tunstall, and Framlingham, the demand for PRS from the Sizewell C workforce is anticipated to account for less than 50% of the frictional vacancy in the peak year – this is considered within the capacity required for the sector to operate and is considered a low risk.

4 using EHS national vacancy rate for PRS and ward-level turnover rate.

Effects on vulnerable sectors of the PRS

4.3.29 In some local areas, there is a danger that workers would compete for the same lower-end of the market as those with a registered housing need, which would have implications for people in housing need.

4.3.30 There are a number of pre-existing factors within Suffolk's (and the UK's) accommodation sectors that are already leading to pressures on ESC's housing services, and the Council has reported that key sensitivities include an increase in homeless presentations since the Homelessness Reduction Act 2017 (Ref. 1.15), and a rise in active cases as a result of the duty to provide each person with a personalised housing plan.

4.3.31 Across the UK, the most common reason for people to present as homeless is that their assured shorthold tenancy has expired and not been renewed by their landlord. This is linked to a combination of changes to the size, function and affordability within the sector, alongside changes to the distribution and level of housing benefit. Since before the last recession (2008) there has been a 13% increase in housing benefit claimants in the former Suffolk Coastal area (now part of ESC). Over this time, the increase has been far greater in the PRS (28%) than the social rented sector (7%). Overall in Suffolk Coastal, around 1 in 3 housing benefit claimants live in the PRS (DWP and 2011 Census Data).

4.3.32 Engagement with Housing Officers from ESC identified the following local areas of need and concern relevant to housing need, homelessness, and housing stock:

- Affordability and end of assured shorthold tenancies are the key reasons for homelessness and housing vulnerability. In the former Suffolk Coastal district, around a third of housing benefit claimants within the PRS are in employment.
- Around 80% of people on the housing register have an income of under £20,000.
- There is a particular vulnerability below the 30th percentile of private sector rents, which is the level at which the local housing allowance rate is set (as of August 2019, the shared accommodation local

housing allowance rate in the Ipswich Broad Rental Market Area [5] is £60.83).

- The majority of housing need (from homeless applications and housing register information) is for 1-bed and some 2-bed properties, and the main limiting factor is affordability. There is an oversupply of 3-bed properties because of the under-occupancy charge on housing benefit.
- ESC place people in the PRS via home-finders and deposit guarantee schemes.

4.3.33 The Ministry for Housing, Communities and Local Government (MHCLG) Live Table 702 shows the average weekly social and affordable rents by local authority. Waveney had an average rent level of £81.60 in 2017/18 compared to £86.71 on average across England. As Suffolk Coastal's stock was transferred largely to the PRS, up-to-date data is unavailable.

4.3.34 Data provided by Suffolk Coastal District Council from solo housing in 2016 noted that rooms cost, on average, around £75–80 per week.

Local effects (Leiston case study)

4.3.35 As set out above, significant effects on the PRS are most likely to occur to the east of the A12, particularly in Leiston.

4.3.36 Technical discussions with ESC have focused on housing need and the PRS in Leiston. It would be particularly important to ensure that the lower 30th percentile of the PRS remains accessible to local people as a way in to the housing market in Leiston (as this is the level at which Local Housing Allowance is set).

4.3.37 Leiston is where estimated vulnerability is greatest (based on housing register and socio-economic data), particularly for households in smaller units, and particularly for young people (and care-leavers) who may be out of work and without access to housing benefit and who the Council would seek to place in the PRS where at all possible (though maybe out of this immediate locality).

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5 A Broad Rental Market Area (BRMA) is an area 'within which a person could reasonably be expected to live having regard to facilities and services for the purposes of health, education, recreation, personal banking and shopping, taking account of the distance of travel by public and private transport, to and from facilities and services of the same type and similar standard.' It must contain a variety of residential property types held a variety of tenancies. It must also contain 'distinct areas of residential accommodation'

4.3.38 In 2011, Leiston's PRS accounted for a greater-than-average 17% of the market (478 homes) with 1,124 bedrooms. Census data also suggests that around 45–50 PRS households move in/out of Leiston each year, and another 45 move within Leiston (not including partly moving households[6]), equivalent to 8–10% of the total stock for in/out flow, and 10% for internal flows. The 2011 Census indicates that the PRS in Leiston has:

- a relatively high proportion of households occupied solely by retired people;
- a high proportion of houses compared to flats;
- a similar proportion of family and adult-only households to the national average;
- a higher proportion of single-person households than the national average; and
- a low proportion of student households compared to the national average.

4.3.39 **Table 4.8** compares the demographic and economic characteristics of PRS households in Leiston, with the districts (as of 2011), East of England and the UK:

Table 4.8: Demographic and economic summary of households in PRS in Leiston ward

Geography	Single-person household	Retired household	Single-person working age	Family with children	Unem-ployed	In Work
Leiston (ward)	38%	13%	28%	31%	4%	73%
Suffolk Coastal	35%	14%	25%	33%	3%	75%
Waveney	37%	13%	28%	35%	7%	63%
East of England	32%	9%	26%	33%	5%	76%
UK	33%	8%	27%	31%	6%	72%

Source: 2011 Census.

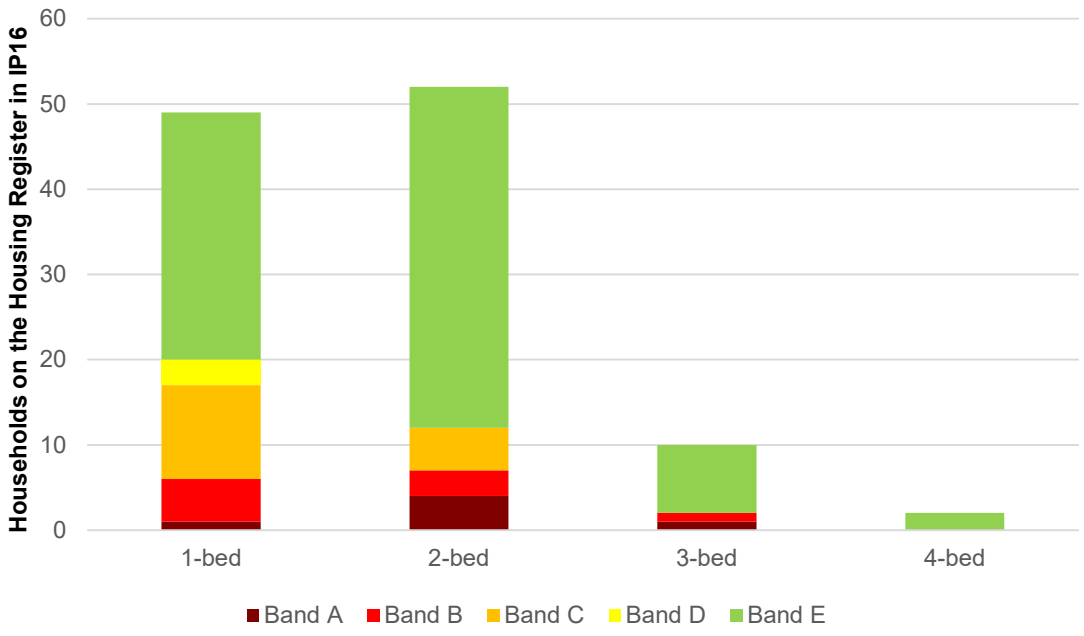
[6] A partly moving household is where one or more members of the household have moved in the last year but not all members have moved from the same address.

4.3.40 ESC shared detailed information[7] on the housing register for people seeking accommodation in Leiston, which sets out that in May 2016 there were 112 households seeking support. Of these:

- 15 are Band A or Band B, considered to be priority need:
  - The majority (c.70% are Band E), and adequately housed;
- Around 80% of households in Band A/B are transfers from current social rented; and
- The overwhelming need is for 1–2 bed properties (62% of all households on the register are seeking this type of accommodation, and 87% of those in priority need).

4.3.41 **Plate 4.1** summarises the housing register for the IP16 Leiston postcode which covers Leiston, Aldringham, Eastbridge, Sizewell, Theberton and Thorpeness.

Plate 4.1: Housing register summary for IP16 postcode (May 2016) by band and size



7 In July 2015 and May 2016.

4.3.42 Compared to 2016 CLG data (Live Table 600), Leiston represents around 6% of the housing need across Suffolk Coastal (with 1,754 households on the register).

4.3.43 In addition to existing need identified by the housing register, the Council notes that the number/proportion of people coming to the Council for housing advice is a useful indicator to monitor housing need. The number of referrals in Leiston has been low in recent years, and was around 16 households in Leiston in 2015.

4.3.44 The gravity model assumes that approximately 392 workers would take PRS accommodation in Leiston (ward) at the peak of the construction phase.

4.3.45 In reality the workforce would build-up over time. The key periods where growth in NHB workers would be steepest are in the run-up to the overall peak, and prior to that in the early years before the project accommodation (on-site accommodation campus and caravan park) is completed (the build-up to the civils peak).

4.3.46 At a ward-level, it is anticipated that in the years leading up to peak the annual build up would average approximately 56 new residents per year in Leiston, compared to an average population turnover of 290 per year based on 2011 Census information:

Table 4.9: Population turnover compared to additional effect of NHB workers in Leiston

Geography	Census 2011		Build-up to peak	
	New working age Residents p/a	Population turnover	New NHB workers in PRS p/a	Proportion of annual average new residents
Leiston	290	6.4%	56	19%

4.3.47 As noted above, this turnover is partly driven by churn in PRS households – around 45–50 whole PRS households move in/out of Leiston each year, and another 45 move within Leiston, equivalent to 8–10% of the total stock for in/out flow, and 10% for internal flows.

4.3.48 Furthermore, within this build up there would be churn as workers on-site for shorter periods move in and out of PRS in Leiston. Churn and frictional vacancy is a necessary factor of the PRS as outlined above.

4.3.49 At present, based on union-agreed rates for accommodation allowance for NHB workers, it is anticipated that workers would be able to afford most of the PRS market with their weekly allowance well above local housing

allowance. However, workers may look to maximise their income by taking accommodation at the lower end of the market.

4.3.50 Workers in the PRS would likely have a preference for 1-bed or shared 2-bed properties.

4.3.51 The current assumptions based on previous experience, experience of Sizewell B outages (which match the skills breakdown of the peak of construction for Sizewell C) and feedback from contractors is that construction workers are likely to share accommodation at an average rate of approximately 1.9 workers per home.

4.3.52 Some workers will also seek HMOs. It is a statutory obligation for local planning authorities to plan for and manage the licencing and enforcement of regulatory standards for HMOs. However, this duty may be affected by a rise in demand.

4.3.53 **Table 4.10** brings together the baseline information on existing stock, housing need, and demand modelled by SZC Co. to compare demand with supply and identify vulnerability in Leiston:

Table 4.10: Comparison of baseline, identified housing need and Sizewell C workers' PRS requirement (estimate) in Leiston

	Housing Stock and Characteristics	Existing Housing Need		Demand from Sizewell C	
Housing Type	Private Rented Sector	Housing Register (excl. Band E)	Housing Need (Band A,B)	Workers in PRS at Peak	Workers in PRS (p/a) – build-up
1-bed	88	20	6	392	56 p/a average to peak
2-bed	171	12	7		
3-bed	182	2	2		
4-bed +	37	0	0		
Total	478	34	15		

4.4 Owner-occupied accommodation

4.4.1 At the peak of construction, approximately 880 construction workers would likely have moved to the area and be living in owner-occupied accommodation across the 60-minute area.

4.4.2 The 2011 Census identifies that there were 134,427 family homes (3+ bedrooms) in the owner-occupied sector across the 60-minute area in

2011. Since then the private housing sector has grown by approximately 4% in Suffolk, so this is considered an under-estimate.

4.4.3 As such, Sizewell C workers are likely to account for less than 1% of all family homes in the owner occupied sector in the area – this is a small fraction of homes, and well within the average level of churn within the sector, and is therefore expected to lead to a negligible effect overall on the operation of the housing market.

4.4.4 Workers are likely to concentrate relatively close to the site and this has been accounted for in ward-level modelling of the workforce by sector within the gravity model as set out in **Technical Note 3: Spatial Distribution of the Workforce – Appendix 9C** of **Volume 2** of the **ES**.

4.4.5 At the peak of construction activity, Leiston would likely be home to approximately 160 workers who have bought property in the owner-occupied sector (accounting for approximately 11–12% of owner-occupied sector homes in Leiston in 2011). Some of these would be members of the operational workforce, as this begins to mobilise by peak construction. Elsewhere around the site, figures are predicted to be far smaller and/or represent a smaller proportion of the housing market, not exceeding 4% of the market in the peak year.

4.4.6 Given the length of time these workers are likely to be involved with the Sizewell C Project, this effect would have built up over several years in advance of the peak. Therefore, this would be well within the capacity of the local housing market to react to change.

4.4.7 **Table 4.11** sets out the effects in wards closest to the site, in the context of average annual change in the market based on household moves by tenure in 2011 (Census):

Table 4.11: Workers in owner-occupied sector accommodation in the context of stock and average annual churn in wards closest to the site

Wards	Workers in owner-occupied sector at Peak (Construction only)	Workers in owner-occupied sector at Peak (Operational only)	Total Stock (2011 Census)	Workers as a % of Total Stock at Peak	Average Annual build-up	Average Annual Churn	Workers as a % of annual churn
Leiston	107	55	1,339	12.12%	23	102	23%
Aldeburgh	51	26	952	8.09%	11	139	8%
Saxmundham	41	21	1,107	5.57%	9	138	6%
Yoxford	19	10	520	5.56%	4	61	7%

Wards	Workers in owner-occupied sector at Peak (Construction only)	Workers in owner-occupied sector at Peak (Operational only)	Total Stock (2011 Census)	Workers as a % of Total Stock at Peak	Average Annual build-up	Average Annual Churn	Workers as a % of annual churn
Snape	16	8	518	4.56%	3	52	6%
Rendlesham	17	8	659	3.79%	4	90	4%
Orford and Tunstall	9	5	449	3.18%	2	65	3%
Walberswick and Wenhaston	11	6	567	3.04%	2	65	4%
Wickham Market	7	4	474	2.20%	1	43	3%
Halesworth	14	7	1,041	2.04%	3	129	2%

4.4.8 This shows that in Leiston (for example), over 100 households in the owner-occupied sector moved in 2011 (Census). Sizewell C workers would represent around one in four of those moves in any given year up to the peak of construction. Elsewhere, Sizewell C workers may be expected to account for less than one in ten of annual moves per area.

4.4.9 The remainder of workers in the owner-occupied sector at the peak of construction would be dispersed in wards beyond this area (not shown here, as the number of workers represents an insignificant change to the housing market in these areas).

4.5 Latent and other accommodation

4.5.1 Latent accommodation includes un-rated tourist accommodation, rooms for let in private homes, currently empty homes, and accommodation new to the market each year. This type of accommodation would offer an opportunity to mitigate negative effects on tourist and PRS capacity, as well as allowing local residents to benefit economically, for example, by renting out spare rooms.

4.5.2 The gravity model makes no assessment of the likelihood of workers using latent accommodation. The stock of latent bedspaces is likely to follow the general distribution of the overall stock in family homes, rented, social rented and tourist accommodation.

4.5.3 Feedback from Hinkley Point C (Ref. 1.16) suggests that this type of accommodation is very popular with workers, with around 10%, of NHB

workers using spare rooms in existing homes. As such, the figures presented in above for uptake of accommodation in the PRS and tourist sectors may be considered an upper-estimate should these levels of latent accommodation be achieved.

4.5.4 Based on 2011 Census data for occupancy rating (using a conservative assessment – considering that any home with a '+2' occupancy rating has at least one spare bedroom), there were over 1,000 spare bedrooms in Leiston alone. **Table 4.12** sets out the number of empty bedrooms across the study areas in 2011 by tenure (2011 Census):

Table 4.12: Estimated unoccupied bedrooms by tenure based on occupancy rate

Geography	Owner Occupied (Bedrooms)	Social Rented (Bedrooms)	Private Rented (Bedrooms)
Local Wards			
Leiston	830	37	81
Saxmundham	875	81	109
Snape	865	51	80
Yoxford	407	20	51
Aldeburgh	445	11	42
Districts			
Great Yarmouth	11,967	760	1,030
South Norfolk	22,228	594	1,787
East Suffolk	39,745	1,550	3,407
*Suffolk Coastal**	*22,372*	*678*	*1,929*
*Waveney**	*17,373*	*872*	*1,478*
Mid Suffolk	16,622	488	1,373
Ipswich	15,735	1,467	1,693
Babergh	15,100	629	1,304

*Source: Census, 2011. * now part of East Suffolk Council.*

a) Empty homes

4.5.5 SZC Co. has been working with ESC and recognises that there is an opportunity for the Sizewell C Project to facilitate the return of empty properties into use.

4.5.6 MHCLG Live Table 615 (ONS, 2018) identifies that as at October 2018 there were 3,257 vacant properties in East Suffolk. Of these, 1,130 are

long-term vacants – meaning that these dwellings had been unoccupied and substantially unfurnished for over six months.

4.5.7 Based on the same data, Waveney had 73 local authority-owned vacant properties, and across East Suffolk there were 56 general needs vacant properties owned by private registered providers.

4.5.8 The ESC website states that *"Empty properties can not only bring down the amenity of a neighbourhood, but are also a waste of resources as they could provide much needed accommodation without the need for new housing"* and *"Empty homes often become a target for vandalism, arson, squatters, fly-tipping and other criminal behaviour"* (https://www.eastsuffolk.gov.uk/housing/empty-properties/).

4.5.9 SZC Co. considers that it is possible to achieve a reduction in these numbers of empty homes, recognising the significant opportunity and potential for a positive impact this approach could have on the housing market and in terms of sustainable resource use.

4.5.10 SZC Co. is working with ESC to understand practical options to facilitate such a reduction. SZC Co. will provide ESC with a Housing Fund, which would be secured through the Section 106 agreement (see **draft Section 106 Heads of Terms**). Details of the Housing Fund and the measures which may be funded through it, including options relating to use of empty homes, are set out in **section 7** of this Accommodation Strategy**.**

4.5.11 SZC Co. considers that measures which enable the use of long-term empty properties would increase the supply of housing for use by construction workers or facilitate accommodation for households in need, in turn boosting the overall supply and making it more efficient. ESC currently employs measures such as compulsory purchase, private sector leasing schemes, and occasionally provision of financial support where funds are made available for improvements. **Figure 4.1** sets out geographically where ESC has identified the location of empty homes across the district.

4.6 Summary of accommodation capacity

4.6.1 This section has identified that:

- There are unlikely to be macro-level effects on the housing market or availability of accommodation in any tenure when considered across the whole 60-minute area, at the peak of construction.

- There may be some localised effects at the peak of construction, particularly in areas to the east of the A12, on availability of accommodation in the PRS and tourist sectors.
- In terms of owner-occupied accommodation, at peak of construction and in the years leading up to peak, new workers are unlikely to account for a substantial proportion of existing average turnover. Workers may represent around one in four new households per year in Leiston, and less than one in ten elsewhere.
- In terms of effects on tourist accommodation, at peak there may be demand from approximately 800 NHB construction workers. This compares to up to 6,400 (off-peak) 2,600 (peak) spare bedspaces across the 60-minute area. There may be more localised effects on capacity, particularly in Leiston and Aldeburgh.
- In terms of effects on the PRS, at peak there may be demand for 1,200 bedspaces from Sizewell C construction workers. This would require part of, or in some cases exceed, the frictional vacancy within the sector estimated in these wards, requiring mitigation via accommodation management and a Housing Fund (Sections 6 and 7).
- The assessment of effects is considered conservative, in that it assumes no uptake of holiday park accommodation or latent accommodation, assesses the effects at the peak of tourist demand, and likely underestimates the total number of beds at a local scale as a result of limitations on recent datasets (Visit East Anglia and Census data for tourist and PRS supply respectively are nearly 10 years old).

5 Project accommodation

5.1 On-site accommodation campus

5.1.1 SZC Co. considers that there is a clear requirement to provide additional accommodation to meet the needs of the NHB construction workforce. Many of those coming to work on the Sizewell C Project would prefer to live in easily accessible, safe, secure and well-managed campus-style accommodation, which has been purpose-built to meet their needs and is easy to book, good quality and affordable.

5.1.2 This view has been confirmed by EDF Energy's experience of working with contractors at Hinkley Point C. At the time of writing, the on-site accommodation campus at Hinkley Point C remains popular with contractors, is fully occupied, and has been well-used ever since opening.

5.1.3 Contractors have also advised that the provision of good quality campus accommodation can help contribute to SZC Co.'s aspirations for zero harm. Benefits to both physical and mental health may be derived from minimising travel time (thereby the length of the working day), access to comfortable rooms and a range of high quality food options, opportunities to mix in the evenings through the on-site bar and a range of organised events such as quiz nights and access to the on-site gym and (by bus) the off-site sports pitches.

5.1.4 Providing campus accommodation would also help mitigate against the risks of negative local impacts, e.g. the potential displacement of local residents or tourists, as well as delivering significant operational benefits for SZC Co. in terms of the delivery of the construction programme and management of the workforce.

5.1.5 SZC Co.'s project vision outlines the intention to *"deliver a nuclear power station at Sizewell C that would make a major contribution to the nation's low carbon energy needs"*. The Sizewell C Project would be competing with a number of other large infrastructure projects in the UK and Europe and would need to be attractive to draw in the best possible workforce.

5.1.6 The provision of a single, high-quality, on-site accommodation campus where a significant proportion of the workforce can stay for varying lengths of time to complete their tasks is an effective and practical way to achieve the number of workers required to meet the national need for the construction of a large energy infrastructure project, in the context of a large NHB workforce.

5.1.7 This approach takes into account the substantial weight attached by EN-1 (Ref. 1.17) and EN-6 (Ref. 1.18) to the ability to build and deliver nationally important infrastructure in a timely and cost effective manner, while also creating a strong monitoring and mitigation strategy helps to avoid and reduce adverse effects in the local area

a) A single, on-site accommodation campus for 2,400 workers (at peak)

5.1.8 A single campus, within walking distance of the temporary construction area, would play an important role in attracting the high quality workforce required to deliver such a large and complex project. It would meet worker needs and aspirations and help manage worker behaviour and impacts on the wider community, including traffic impacts.

5.1.9 It would result in a better option compared to others that SZC Co. has consulted on, and would help to address concerns about potential adverse effects identified by stakeholders and members of the public through consultation and engagement. The Site Selection Report provided in the

Planning Statement (Doc Ref. 8.4) sets out in detail how SZC Co. has arrived at this option.

5.1.10 The strategy would:

- reduce the number of journeys on local roads;
- balance the economic benefits of workers integrating within housing markets and communities, without overwhelming local communities with new residents;
- reduce pressure otherwise placed on tourist and PRS accommodation; and
- allow flexible working patterns and out of hours working that would be necessary to maintain construction productivity and progress.

5.1.11 The campus has been designed to create a high quality environment in which workers can rest and socialise between shifts and would comprise:

- modular buildings with self-contained rooms, each for one person, and en-suite facilities;
- car parking for residents of the campus (approximately 1,500 parking spaces at a ratio of one parking space per 1.6 bedspaces) in a one storey and two storey car park;
- a restaurant and kitchen facilities;
- bar and recreational areas;
- a gym (on-site);
- a footpath around the periphery of the site to give workers an outdoor exercise option on site;
- a shop;
- laundry service;
- central administration offices;
- waste recycling and facilities to supply energy to the site;
- site security area including fencing;
- perimeter road and appropriate lighting to ensure the safe and secure operation of the site;

- refuse stores for each block; and
- other utilities and services, including a foul water pump station.

5.1.12 Details of the design of the accommodation campus are set out in the **Sizewell C Main Development Site Design and Access Statement**, **Appendix A** (Doc Ref. 8.1).

5.1.13 All Sizewell C workers will be able to access the public areas of the campus, including bar, restaurant, and gym.

b) Off-site sports pitches

5.1.14 Off-site sports pitches will also be provided as part of the campus, with bus transport provided to and from the campus. These will comprise new sports facilities – a 3G pitch and two multi-use games areas at Alde Valley School and adjacent to Leiston Leisure Centre. All Sizewell C workers will be able to use the off-site sports pitches and use will also be shared with the school and community during construction. The pitches will be left as a legacy to enhance community provision thereafter.

5.1.15 Details of the design of the off-site sports pitches are set out in the descriptions of development in **Chapters 2** and **3** of **Volume 2** of the **ES**.

5.1.16 SZC Co. proposes to construct or provide a contribution to fund the construction of these off-site sports pitches which would be managed by ESC. The funding would include a contribution for the maintenance of the pitches during the construction phase when the facilities would be used by the Sizewell C construction workforce and provision of a sink fund. During the operational phase, it is proposed that any ongoing costs of the sports facilities would be borne by ESC / Alde Valley School. The provision of the off-site sports pitches will be secured through an obligation in the Section 106 Agreement (see **Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)).

5.2 A managed caravan park for 400 caravans

5.2.1 Caravan accommodation is proving popular at Hinkley Point C with a number of sites coming forward in the early years of construction which required licensing or enforcement action by Sedgemoor District Council. It was agreed with ESC that it would be prudent to pro-actively meet workers' demand for caravans at Sizewell C, and desirable to provide early accommodation to the construction workforce prior to delivery of the accommodation campus on the temporary construction area. Therefore, serviced pitches for up to 400 caravans would be created on LEEIE in Leiston.

5.2.2 This facility would continue to be offered throughout the construction phase, providing an option to workers not wishing to use the accommodation campus or the PRS, owner-occupied sector or local tourist accommodation. Buses would run between the main development site and the caravan park.

5.2.3 An average of 1.5 workers per caravan is assumed, therefore creating a total of 600 construction workers staying at this facility. The number of workers per caravan would depend upon the size of caravans brought to site but an estimate of around 1.5 workers per caravan is considered realistic.

5.2.4 Details of the design of the caravan park are set out in the descriptions of development in **Chapters 2** and **3** of **Volume 2** of the **ES**.

5.2.5 A temporary footpath for construction workers would be provided from the caravan park through LEEIE, joining Valley Road opposite the existing footpath. This would allow construction workers from within the caravan part to walk to Leiston town centre safely.

5.2.6 The primary purpose of the proposed caravan park is to ensure civils construction workers who seek to bring caravans to construction projects have a designated space, thereby reducing the risk of unlicensed caravan sites, while also seeking to reduce effects on the rest of the market.

5.2.7 However, SZC Co. also expects the market to also bring forward accommodation of this type, but in smaller pitch numbers due to the nature/size of existing sites. SZC Co. will be supporting this in a managed, sustainable way in-line with providers' aspirations and ESC policies.

5.3 Phasing, operation and post-operation

5.3.1 **Figure 5.1** shows the interaction between the build-up of the NHB workers requiring accommodation in the local area, and the indicative opening dates of the campus and caravan park.

5.3.2 This sets out that construction workers would be able to bring caravans from the end of the first 12 months of construction activity, when the NHB workforce is approximately 750, and the on-site accommodation campus would be online after approximately 36 months when the NHB workforce is approximately 2,500.

5.3.3 The chart is illustrative. In reality, SZC Co. would work closely with contractors and ESC to consider lead-in times for booking, and potential phased opening and closing of the accommodation to ensure it can respond quickly to demand when it is online.

5.3.4 It can be seen that the gap between the availability of campus accommodation and the total amount of accommodation required is never greater than the number of bedspaces which SZC Co. assesses to be the minimum amount of spare capacity available in the 60-minute area.

5.3.5 The proposed phasing of the Sizewell C Project is set out in the **Implementation Plan** which is provided as **Appendix I** to the **Planning Statement** (Doc Ref. 8.4). Through an obligation in the Section 106 agreement, SZC Co. will commit to using reasonable endeavours to deliver the accommodation campus and caravan park in accordance with the Implementation Plan (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)).

5.4 Consideration of alternatives

a) Alternative campus strategies e.g. dispersal

5.4.1 SZC Co. has considered the alternatives to a single, on-site accommodation campus. It has concluded that an off-site campus (either as an alternative, or an addition to a smaller, on-site accommodation campus) would be unlikely to make a significant difference in terms of any localised community impacts around the main development site, but would lead to the reduction or loss of the many benefits of an on-site accommodation campus in terms of reduced journeys and wider worker management.

5.4.2 Providing a single, on-site accommodation campus approach also helps to mitigate the impacts of large groups of construction workers in a number of otherwise small rural communities. A multiple campus option would spread the workforce across a wider area and increase the difficulty in managing effects on those communities, as well as increasing traffic through more and longer bus journeys across multiple shifts.

5.4.3 By having accommodation adjacent to the site, workers would be able to walk to work, and the effects on traffic that would be generated by a multiple-campus approach would be avoided. This approach is supported by the Examining Authority's report from Hinkley Point C (Ref. 1.19). In examining the development consent order application, subsequently granted in 2013, the Examining Authority recommended to the Secretary of State (paragraph 4.231) that there are:

> *"…significant advantages for the project in housing workers as close as possible to the site. In that way they would be readily available at short notice to tackle any emergencies that arise, and undertake 'out of hours' tasks. The time they would spend*

travelling to work would be reduced. Whilst this would no doubt be offset in part by an additional need to travel when not working between the site and other nearby centres for leisure and other purposes, it nonetheless seems to us that overall there would be a net reduction in vehicle movements."

5.4.4 SZC Co. has considered feedback from public consultation, some of which suggested that project accommodation should be located in Ipswich and/or Lowestoft, stating that these locations would be better able to cope with the influx of a large numbers of workers. However, experience from other projects indicates that these locations are too far from the site to be attractive to NHB workers (at least 36 minutes to Lowestoft and 46 minutes to Ipswich by car but considerably longer via park and ride). As SZC Co. cannot impose workers' accommodation choice, it is likely that project accommodation in these locations would be under-utilised. In turn, this could lead to increased pressure on tourist and private-rented sector accommodation close to site.

5.4.5 Other concerns were raised that provision of an on-site accommodation campus would limit economic benefits to local businesses. However, the anticipated distribution of NHB workers indicates that non-campus-based workers would prefer to live close to the site, with concentrations particularly in built-up areas where there are more PRS and tourist rooms. This means that economic benefits would be shared around different communities, regardless of the number of campuses or campus location.

5.4.6 The operation of the campus would bring economic benefits in and of itself, including the potential for local businesses to supply goods and services used by the accommodation campus (e.g. administration, security, catering and other support functions) which have a high local contingent and therefore bring economic benefits for residents and small businesses.

b) Alternative campus sites

5.4.7 **Volume 1, Chapter 4** of the **ES** (Doc Ref. 6.2) sets out the evolution of the Sizewell C Project through consultation and engagement, including consideration of alternative strategies and locations for workforce accommodation.

c) Caravan park at LEEIE

5.4.8 The proposal to provide bespoke caravan accommodation and a potential location for this was consulted upon with ESC who suggested that SZC Co. should consider land already within the proposed main development site red-line boundary, that is, either on the on-site accommodation campus

land or LEEIE (subject to feasibility, for example with regards to being able to provide a suitable waste water / sewage solution at LEEIE).

5.4.9 There was insufficient space on the campus while LEEIE is close to Leiston with facilities such as supermarkets, pubs and takeaways that are likely to be attractive to workers choosing to live in caravan accommodation.

5.4.10 The layout of the site has been shared with ESC and refined in response to comments on the capacity, layout, and facilities at the site.

5.4.11 SZC Co. has been working with ESC to examine the issues around the delivery, operation, and management of the site. Discussions have also been held with Leiston Town Council, in response to a number of issues raised during consultation in terms of the movement of workers between the caravan park and facilities in Leiston.

6 Accommodation management system and workforce monitoring

6.1 Accommodation management system

a) Introduction

6.1.1 In order to help manage the distribution of workers and avoid or reduce potential adverse effects on accommodation capacity in local areas in a responsive way, SZC Co. would work with partners to develop mechanisms that:

- allow local landlords, tourism businesses, and residents to register accommodation available for workers; and
- enable SZC Co. and its contractors to signpost workers towards this accommodation and provide information to accommodation providers.

6.1.2 The Accommodation Management System would be secured through an obligation in the Section 106 agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)) and would have the following components:

- Monitoring of the workforce (see **Section 6.2**), contractors and local housing market.
- Provision of information to workers, contractors and accommodation providers, and working with providers to help them understand opportunities to support the project's workforce.

b) Information management

6.1.3 As part of the Accommodation Management System, SZC Co. would collect information about the local accommodation market (including registrations from providers with accommodation) that could be used to provide contractors and workers with a means of finding the most suitable accommodation by type and location.

6.1.4 In addition, information would be provided to prospective or existing landlords that could help to make sure they are providing accommodation that meets safety and quality standards. This would help to avoid the risk of landlords being unaware of rules and regulations that apply to letting property, or new providers entering the market with accommodation of an unacceptably low standard.

6.1.5 An accommodation portal would serve to raise understanding of applicable regulations and sources of further information as well as confirming SZC Co.'s expectations. This would be an online resource publicised through the Sizewell C Project website and via newsletters, community engagement (including regular community forums) and through partners and stakeholders.

6.1.6 SZC Co. would run a series of 'one-stop-shop' open events – for potential providers of accommodation, along with ESC, in order to:

- inform them of the likely scale of demand from workers, how this may change over time, and the likely accommodation requirements and characteristics of the workforce;
- set out expected safety and quality standards, as well as planning and licensing that may be required to provide accommodation to workers, for example amendments of residency criteria for caravan sites;
- respond to any concerns that accommodation providers may have about NHB construction workers, including how the Sizewell C Project uses the Worker Code of Conduct to enforce high standards of behaviour both on and off-site; and
- explain what providers can / cannot expect from the Sizewell C Project based on lessons learnt from Hinkley Point C e.g. the project will not reimburse unpaid rent and – due to the large number of people on site - can only enforce the Worker Code of Conduct if accommodation providers collect a full name / contractor name from tenants.

6.1.7 Through a 'look-ahead' with contractors and SZC Co.'s workforce delivery team, spikes in worker demand may be mitigated through a proactive approach to identifying suitable accommodation.

6.1.8 The Sizewell C Project would also be able to provide information to accommodation providers about the key activities of the construction phase, facilities and build-up of the workforce, which would help providers understand more about the likely demand and plan for it. This may include providing information on the location of project infrastructure, such as park and ride sites and pick-up points for buses for example.

c) Workforce induction and accommodation information

6.1.9 The induction process would promote community cohesion through the provision of local information, which would help workers to integrate within the community. Information on leisure activities, sports facilities, and places of interest would be made available to workers. SZC Co. and ESC would seek to promote community cohesion through the management of the use of the off-site sports pitches delivered by the Sizewell C Project which may include organised events and leagues.

6.1.10 Information would be collected on the location of buildings for different faiths. Wherever possible, this would be supplemented with contact details provided to workers on the project. A chaplaincy service would be included as part of occupational healthcare provision within the project.

6.1.11 Accommodation providers would be encouraged to keep the project updated on activities and events that they are organising and topical information on events would be sought from tourist bodies including The Suffolk Coast Destination Management Organisation (DMO).

6.2 Community cohesion and property quality and safety

a) Community safety

6.2.1 A stakeholder group will be established, comprising relevant service providers including the emergency services and local authorities, to deliver the objectives of the **Community Safety Management Plan** (Doc Ref. 8.16). Implementation of the **Community Safety Management Plan** will be secured through an obligation in the Section 106 Agreement (see **Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)).

6.2.2 The **Community Safety Management Plan** outlines the approach to community safety in the area including some measures that will be secured through the Section 106 agreement, including a governance process and:

- a precautionary approach to manage impacts on community safety, cohesion and public services, with a focus on prevention where possible and measures to raise awareness of the Sizewell C Project's potential risks to community safety;
- a mechanism for the local community to register public concerns, through (for example) a hotline;

6.2.3 This extends to include issues associated with the provision and use of accommodation.

6.2.4 SZC Co. is committed to ensuring high standards of behaviour among its workforce, both on site and when they are out and about in the local community. The Worker Code of Conduct will set out clear expectations of how workers should behave and interact with the local community, including the way they use accommodation. It would be communicated to all contractors and workers and would be strictly enforced.

6.2.5 The Worker Code of Conduct:

- sets out the behaviour expected of workers both on site and in the community;
- outlines the role of employers in ensuring good conduct by their employees;
- informs the community of the standard of behaviour they should expect from workers and their employers; and
- explains how the Code would be enforced.

6.2.6 The Worker Code of Conduct would be explained to workers at induction and there would be regular awareness campaigns throughout the construction period to ensure workers remain aware of the requirements and obligations.

6.2.7 Each worker would be required to sign a copy of the document at induction, as a condition of employment on the Sizewell C Project. Comments and complaints about the workforce would be monitored and necessary action taken, with feedback given to anyone making a complaint. Breaches of the Code of Conduct would be dealt with on a case by case basis, with the ultimate sanction for breach being removal of a worker from the Sizewell C Project.

6.2.8 A Community Engagement Strategy is set out within the **Code of Construction Practice (CoCP)** (Doc Ref. 8.11). This sets out points of contact between the community and the Sizewell C Project, with the aim of

minimising negative impacts and community tension and building on positive opportunities for community cohesion.

b) Quality/safety of accommodation

6.2.9 Some landlords and providers of tourist and latent accommodation may be new to letting and unaware of rules and regulations that apply to letting property. In addition, increasing demand may lead to providers entering the market with accommodation of an unacceptably low standard.

6.2.10 As set out above, the accommodation portal and one-stop shop events would serve to raise understanding of applicable regulations and sources of further information as well as confirming ESC and SZC Co.'s expectations on quality, together with actions to be taken when minimum levels are not met, which could be addressed by the Housing Fund provided in **section 7** of this strategy.

6.2.11 As set out above, a **Community Safety Management Plan** (Doc Ref. 8.16) has been prepared. This sets out that a Strategic Relationship Protocol would be agreed with Suffolk Fire and Rescue Service which will include resourcing information. Financial contributions towards additional resourcing would be secured through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)). This would enable Suffolk Fire and Rescue Service to respond to increased demand for community information and awareness training, such as home safety checks.

6.3 Workforce monitoring

6.3.1 As set out in this **Accommodation Strategy**, SZC Co. is proposing embedded mitigation in the form of project accommodation, as well as a Housing Fund and Accommodation Management System which would be secured through a Section 106 Agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)). SZC Co. considers that these measures would be effective in mitigating the effects of a total NHB workforce of up to approximately 5,880 at peak.

6.3.2 Worker use of accommodation assessed and mitigated in this Accommodation Strategy has excluded latent accommodation. This is a precautionary estimate and therefore the mitigation should be sufficient to mitigate significant adverse effects that are predicted.

6.3.3 However, SZC Co. recognises that:

- Within this total workforce, there may be variations from the predicted spatial distribution and accommodation assumptions that could cause differential effects in some local areas;
- Effects and mitigation set out in the **Accommodation Strategy** have the potential to be influenced by factors beyond SZC Co.'s control including political, legislative and policy change, economic change and local factors.

6.3.4 In order to plan for this uncertainty, and to help ESC manage the Housing Fund effectively, SZC Co. would monitor the workforce and accommodation being used by workers. This workforce monitoring will be secured by the Section 106 Agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)). SZC Co. and contractors would work together to decide how mitigation can be best directed to areas, sectors and services that would address any issues as they arise.

a) Workforce monitoring and surveys

6.3.5 Information on the location and type of accommodation being used by workers would be collected throughout the construction period through regular workforce survey. The results would be benchmarked to an overall database that would record any worker who is employed on the Sizewell C Project, and who travels to site.

6.3.6 The workforce profile includes all workers who work at the site for 5 days in any calendar month, or 4 consecutive days, and therefore captures all people likely to seek accommodation in the local area that may contribute to potential adverse effects.

6.3.7 The approach to monitoring would be set out and secured by the Section 106 and would be based on the following principles:

- That workers would be inducted to the Sizewell C Project and given a unique reference number and site access card that would be used to track their progress on the Sizewell C Project on a single database. This would inform SZC Co. of how many people are working on the Sizewell C Project, and how many people travel to site, and how regularly.
- Workers would periodically need to re-induct on the Sizewell C Project, but would retain their unique reference number.

- Regular workforce surveys would be undertaken, fixed to a statistically significant sample size, and with consistent survey questions that can provide longitudinal data.
- Workforce surveys would return information relating to:
  - Whether the workforce is HB or NHB – by asking about the permanent place of residence if workers do not move to the area for work (i.e. HB workers), and the temporary place of residence if workers do move to the area for work (i.e. NHB workers).
  - The skill/role of the employee.
  - Demographic and housing characteristics of the worker relevant to the assessment, the type of temporary accommodation they are staying in, and whether they have brought with them any dependent children or adults.

6.3.8 This data would be collected in a single database and reviewed every six months in order to track the scale and potential effects of the workforce to inform the delivery of mitigation measures as set out in this assessment.

b) Governance

6.3.9 By monitoring accommodation patterns, and through on-going stakeholder engagement, potential effects arising from accommodating workers (on housing, public services or community safety) would be identified.

6.3.10 SZC Co. propose to establish a Sizewell C Socio-economic Advisory Group via the Section 106 agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)) which would enable it to work with ESC and contractors to regularly review monitoring and survey information collected, against the changing background of policy, economic and legislative change that may arise during the construction phase of the Sizewell C Project, and collaboratively decide on how best to:

- Implement and review the Accommodation Management System;
- Interact with providers and ESC regarding measures the Housing Fund should seek to deliver.

6.3.11 It is proposed that East Suffolk Council would bid directly to SZC Co. for the release of Housing Fund monies.

c) Monitoring of effects

6.3.12 In some instances, the monitoring of potential effects of the construction workforce is a more useful way of identifying where and which mitigation measures need to be enacted than monitoring the workforce itself. For example, local authorities are required to provide a substantial amount of monitoring data to central government in order to monitor the level of service demand, for example in the form of H-CLIC[8] returns that monitor the effectiveness of homelessness prevention by tracking presentations to the council (by reason) and outcomes of personalised housing plans (PHPs).

6.3.13 SZC Co. and ESC recognise the value of tracking homelessness presentations caused by landlords' ending of assured shorthold tenancies. This could be tracked against the national average rate to consider whether the Sizewell C Project may be having an influence on the lower 30% of the PRS, upon which the Council relies to discharge housing need (and support people with housing benefit to find affordable private rented tenures).

6.3.14 This, or any other measure deemed appropriate and agreed bilaterally between SZC Co. and East Suffolk Council would be amended from time to time, with agreement from both parties, in response to any potential changes in policy or legislation. This agreement would be reported to the Socio-economic Advisory Group.

7 Housing Fund

7.1 Introduction and principles of the Housing Fund

7.1.1 As set out in **section 4**, the construction phase of the Sizewell C Project may result in NHB workers looking to rent property in the PRS or tourist sector within 60-minutes of the main development site at the peak of construction.

7.1.2 These workers would look to find accommodation for a range of short-medium timescales, relatively close to the site, and would therefore likely overlap with demand from local residents, especially within the lower quartile of market rents, and within smaller (1–2 bed) properties or HMOs in order to maximise the value of their subsistence and accommodation allowance.

[8] Homelessness Case Level Information Collection (H-CLIC). H-CLIC is quarterly data return on local authorities' actions under statutory homelessness legislation.

7.1.3 There are a number of pre-existing factors within Suffolk's (and the UK's) accommodation sectors that are already leading to pressures on the ESC's housing services, and the councils have reported that key sensitivities include, for example:

- Specific areas such as Leiston where vulnerability is greatest (based on housing register and socio-economic data), particularly for households in smaller units, and particularly for young people (and care-leavers) who may be out of work and without access to housing benefit and who the Council would seek to place in the PRS where at all possible (though maybe out of this immediate locality – Leiston is unpopular with households in need and is often rejected).
- Homeless presentations have increased since the Homelessness Reduction Act, and there is a rise in active cases as a result of the duty to provide each person with a personalised housing plan.

7.1.4 SZC Co. would provide support for the housing market in the local area through the measures set out in **section 6** and by the establishment of a Housing Fund to address potential adverse effects on local accommodation markets and sectors, and service provision across the 60-minute area resulting from the inflow of NHB workers. The Housing Fund would be established through an obligation in the Section 106 Agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)).

7.1.5 SZC Co. considers that direct investment in the market, i.e. providing equity investment into new-build schemes to assist developers in bringing forward or 'kick-starting' stalled development schemes, is unlikely to be effective in increasing aggregate supply, as there are very limited stalled sites – in scale and location – that could benefit from this.

7.1.6 However, investment in existing projects may enable them to deliver more social housing which would ease potential displacement impacts at the bottom of the market.

7.1.7 In determining how to target the Housing Fund, a range of factors would need to be considered including the cost, the need to deliver specific outcomes in specific locations, and the balance between providing permanent homes, temporary solutions, and service support to indirectly reduce demands.

7.1.8 Decisions about how the Housing Fund would be distributed and managed to support the above initiatives would in part need to respond to monitoring information, and in part be defined by likely significant effects identified in advance. For example, direction of funds could be linked to trends in

variation from the national average of reasons for homelessness presentation, pro-rating ESC's rate of end of assured shorthold tenancy as the reason for homelessness to the national average.

7.1.9 The key principle would be to ensure that the Housing Fund is directed towards the areas likely to experience significant impacts but also to provide ESC (as the local experts) with flexibility as to how it is best used.

7.2 Role of the Housing Fund

7.2.1 The Housing Fund would assist ESC to:

- pre-empt and mitigate against any potential adverse effects on the local housing market arising from the temporary inflow of construction workers and their demand for accommodation;
- boost the supply of accommodation, including affordable housing, in the local area; and
- provide support for the provision of housing services to local residents who need access.

7.3 Initiatives and possible outcomes

7.3.1 SZC Co. has been discussing a range of possible initiatives with ESC with the aim of identifying the type of targeted initiatives that would be most effective in avoiding or mitigating the specific potential adverse impacts of the Sizewell C Project. These are based on:

- SZC Co.'s projected information on the size, location and demographic of the workforce, and assumptions about how many would seek private rented accommodation;
- Experience at Hinkley Point C, and particularly feedback from the Hinkley Point C Socio-economic Advisory Group on the effectiveness of monitoring and implementation of the Housing Fund across Sedgemoor and West Somerset;
- Public datasets on the stock and turnover within the PRS;
- Quantitative information from ESC on local demand for homes and vulnerability to homelessness, including housing register information by settlement showing the characteristics of households in Band A and B (previously referred to a priority need); and

- An understanding of the existing pressures on housing services based on meetings with ESC's Housing Officers, and a review of published material including the East Suffolk Housing Strategy.

7.3.2 A number of initiatives are set out in **Table 7.1**, as options that could draw on the Housing Fund to mitigate effects:

Table 7.1: Measures for potential implementation via the Sizewell C Housing Fund with justification

Measures to boost accommodation supply across all tenures

Workers may seek accommodation in the PRS, reducing the capacity of the market to serve existing needs. By increasing the overall supply and quality of homes across all tenures, this would reduce the pressure on the overall stock.

Measure: Stimulating new/improved supply in the PRS and social rented stock.

Reason for inclusion in the Housing Fund: Some workers would seek smaller units in the lower percentiles of market rent within the PRS. These are same type of properties that the local authorities would also look towards to discharge their housing duties to residents in housing need. Therefore, funding initiatives to improve stock and stimulate supply would help to mitigate the pressure on competition for the existing stock.

Implementation and potential outcomes: May include:

- Support rent/deposit guarantee schemes - interventions to make the market work better, and support rent deposits for people at risk of homelessness.
- Support existing and new activities such as the Leiston Foyer scheme – enabling care leavers and vulnerable young people to build independent living skills in a safe environment.
- Support selected activities funded by the Housing Revenue Account within ESC where these is a clear mitigation of project effects. For example, ESC is working with Solo Housing to provide studios or shared use facilities, linked to services that would help deliver personalised housing plan initiatives such as supported pathway into work/college.
- Investigate the potential to pro-actively bring forward HMOs to address likely demand for these from the project/address the issue of unlicensed and overcrowded HMOs. This could use Council-owned Leiston properties to become exemplar for HMOs and kick start other developments (LPAs have role as specialist housing provider). To avoid an over-concentration of HMOs being left in Leiston post-Sizewell C construction, there are ways of bringing forward HMOs to future proof them e.g. conversion into 2 bed flats when construction phase over.
- Provide equity loans to residents in the social rented sector, owner occupied or PRS. Initiatives funded as loans, enable money in the Fund to be recycled so that it could provide ongoing support for future housing initiatives and serve as a further legacy benefit
- Housing management, enforcement and licencing support for ESC to ensure best use of existing stock.

Measure: Bringing empty homes back into beneficial use.

Reason for inclusion in the Housing Fund: Opportunity to boost supply – bringing existing homes back into use for either workers or general lettings/sales - private or public-sector operated.

Implementation and potential outcomes: May include:

- Funding for investigative services to identify and research empty properties and their potential for re-occupation. Targeted initiatives could for example specifically look at smaller units, flats, units above shops, etc. that would serve the specific needs identified by households in priority need, and the

needs of workers.

- Support empty homes back into use specifically as rented worker accommodation by, for example, brokering relationships between owners and contractors.
- Loans/grants/guaranteed lets e.g. the creation of a renovation grant for property owners who are committed to renting accommodation or rent agreements fixed to local housing allowance rates. The upgrade of these properties would also enhance their potential for continued use by communities beyond the construction phase, providing a legacy benefit.
- Make it easier for residents to report empty homes, for example via online forms.
- Help by funding information on options for renting, selling and refurbishment for owners.
- Support the East Suffolk Housing Strategy (2017) target to "use the full range of powers available including Compulsory Purchase Orders to further reduce the number of long term empty properties in East Suffolk".

Measure: Funding to act as 'grant replacement' for existing/pipeline development schemes, and support registered housing providers (RHPs) to bring forward properties.

Reason for inclusion in the Housing Fund: Boosting supply, and particularly the proportion of pipeline supply per development/site that could be affordable, helps to reduce potential pressure on housing need generally (taking pressure of the PRS for workers and households in housing need). Supporting the East Suffolk Housing Strategy (2017) target to "increase the amount of Council owned affordable housing from 4,479 homes to more than 5,100 homes".

Implementation and potential outcomes: This would:

- Help to deliver the measures in the East Suffolk Housing Strategy (2017) that support work with housing associations to explore opportunities for mixed schemes of private sale and affordable housing to generate profits to replace grant funding, in partnership with the private sector. These measures are directly complementary to measures that would meet the aspirations of the Housing Fund.
- Support the East Suffolk Housing Strategy (2017) target to "develop partnership arrangements with key housing association partners to increase the delivery of new housing supply". For example – East Suffolk are already working with Flagship Housing Association on the review of their estates to identify opportunities for new supply and estate renewal. The Housing Fund could be used to support such relationships though site promotion, financial assistance, etc.
- Support the East Suffolk Housing Strategy (2017) target to "actively support the broader supply of housing to ensure East Suffolk is the preferred location for private developers and housing associations" – activities could include funding national promotion events, strategic relationships with providers, and liaison between developers, RHPs, landowners and landlords, etc.

Measures to improve the efficiency of existing housing stock

Workers may seek accommodation in the PRS, reducing the capacity of the market to serve existing needs. By making better use of existing stock across all tenures, capacity may be freed to better respond to households at risk of homelessness who would otherwise be competing with construction workers for property.

Measure: Stimulating more efficient use of the PRS and social rented stock.

Reason for inclusion in the Housing Fund: By making better use of existing stock across all tenures, capacity may be freed to better respond to households at risk of homelessness who would otherwise be competing with construction workers for property.

Implementation and potential outcomes: May include:

- Tackling under-occupation – The East Suffolk Housing Strategy (2017) recognises that existing homes are often too large for the recent demand from smaller households needing one or two bedrooms. Review of Census data identifies there are hundreds of under-occupied properties in the

area.

- Enabling searches for and promotion of PRS stock for ESC to use to discharge housing duty, and engagement with landlords.
- Support the East Suffolk Housing Strategy (2017) target to "address need for specialist housing for older people" (and care leavers). In recognition that workers in Leiston may seek smaller units within the lower quartile of the rental market, that might otherwise be suitable for supporting older and more vulnerable people.
- Support the East Suffolk Housing Strategy (2017) target to "work with the PRS to ensure properties are well maintained and managed" - homes in the PRS – particularly HMOs are most likely to fail to meet minimum legal standards. Housing association and council homes generally meet decent homes standards and the main issues for social landlords are investment to maintain the stock in good condition and the suitability of the existing housing for changing needs.
- Measures to identify and promote the use of latent stock – there are an estimated 300 under-occupied homes with 400 spare rooms in Leiston (2011 Census).

Measures to support service delivery

As a result of competition for private rented units between Sizewell C construction workers and permanent residents (including those claiming Universal Credit or housing benefit, vulnerable people, and people on low incomes), there may be an increase in demand for Council services including homelessness presentations, demand for personalised housing plans and increase in households on the housing register. Measures to support the provision of housing services may therefore help to relieve some of this pressure should it occur (or avoid it through resilience).

Measure: Funding for staff/service resilience.

Reason for inclusion in the Housing Fund: Ensure that the potential effects on housing need and need for Council housing services (including provision of front-line services, admin support, development of personalised housing plans) from local residents as a result of pressure on the PRS can be mitigated, should it arise.

Implementation and potential outcomes: May include:

- Backfilling of roles to ensure existing housing officers are able to continue to provide services
- Financial support for delivery of the floating support service, to ensure marginalised adults have access to specialised accommodation and services (the East Suffolk Housing Strategy (2017) notes that "there are approximately 100 supported housing places in East Suffolk for marginalised adults who would otherwise be in danger of homelessness. In addition to this, a floating support service provides support to people who would otherwise struggle to maintain their tenancies in non-specialist housing. The effect of the Homelessness Prevention legislation is likely to lead to added demand for these services.")

Measure: Supporting schemes to enable access to the PRS, and particularly tackle issues directly affected by legislative changes.

Reason for inclusion within Housing Fund: East Suffolk estimate that approximately 30% of households on the housing register are aged under 18 to 24 – and this age group are no longer eligible for housing benefit if not in employment. This has led to greater demand for front-line housing services, particularly from young, single people – and a demand for smaller properties – that may be exacerbated as a result of construction worker demand for PRS properties.

Implementation and potential outcomes: May include:

- Support for temporary accommodation provision e.g. support funding for an in-district facility of sufficient quality, and with appropriate support for the sometimes complex needs of the people using it.
- Support for investigating solutions out-of-area, where adequate conditions for implementation of

personalised housing plans are unlikely to be met (for example, investigating solutions for access to work for households in need in Leiston may lead to the need to seek housing solutions elsewhere).

- Supporting the East Suffolk Housing Strategy (2017) target to "implement the Homelessness Reduction Act 2017 to ensure members of the community threatened with homelessness are provided with increased support" – guidance states that most local authorities should prepare for an increase in customers who are entitled to 'case work' support, and be prepared to capture more information on the circumstances and needs of homeless people seeking assistance.
- Support the East Suffolk Housing Strategy (2017) target to "develop a specific programme tailored to the needs of rural communities".

7.3.3 It is anticipated that:

- The range and balance of initiatives would evolve over time as the Sizewell C Project progresses and can be responsive to (e.g.) legislative changes and economic climate should they change.
- The Housing Fund would be drawn on both as a response to monitored effects, and as precautionary investment to avoid potential adverse effects where initiatives require a lead in time ahead of the peak of construction effects. The Housing Fund could be used to both increase supply and to invest in a range of initiatives that provide greater housing choice, opportunities and resilience in ESC's statutory service.

7.3.4 Where relevant, funding from the Housing Fund may also be used to kick-start stalled development, or lead to direct investment in existing developments which may enable them to deliver more social housing which would ease potential displacement impacts in the lower 30th percentile of the market (on which local housing allowance rates are based).

7.3.5 Part of the Housing Fund would be set aside to support the supply, capacity, and resilience of the tourist accommodation sector and latent accommodation. This would enable additional capacity in the tourist sector to help provide resilience and provide legacy benefits.

7.3.6 This part of the Housing Fund would support in the delivery of supply using the provision of information through regular communication with existing and potential new tourist accommodation providers on expanding or building new provision set out above as a starting point. This would include setting out the scale and requirements of the workforce and enabling businesses to plan for accommodating workers, should they wish. This information may form part of a website, and include, for example links to the Worker Code of Conduct, shift patterns, demographics, and details of information events.

7.3.7 This part of the Housing Fund may also support with planning, licencing, and development, for example funding for ESC to investigate amendments

to licencing for year-round occupancy. It may include funding of pre-application advice should a tourist provider seek to expand/develop a site with the potential for use by workers.

7.3.8 Finally, this portion of the Housing Fund could include funding for tourism businesses to increase capacity or re-design sites to accommodate additional provision, subject to coordination (and any required consents) with ESC.

7.4 Scale of the Housing Fund and implementation

a) Developing supply

7.4.1 **Table 7.2** sets out the measures from **Table 7.1** which could be considered to develop supply in the housing market. In each case, an estimate has been made about the cost per unit/bedspace that the measure could require.

7.4.2 Each of the measures offers slightly different outcomes: some act to increase private sector supply, while others act to increase affordable supply. Some also aim to improve market access and opportunity and would therefore improve turnover generally.

7.4.3 Some of the initiatives could be funded as temporary grants or loans, enabling money in the Fund to be recycled so that it could provide ongoing support for future housing initiatives. This is particularly likely where the Fund is invested in empty homes initiatives and as equity support to new projects. Whilst the decision about how the Fund would be distributed between the various measures would be finalised by the Section 106 Agreement, it would not be unreasonable to target the recycling of a proportion of the investments so that they could be returned to the Fund to deliver further housing outcomes in later years.

7.4.4 In the examples set out in **Table 7.2**, part of the Housing Fund is directed at a combination of equity investment, empty homes and improvement grants and these would typically incorporate recovery of the grant over a 2–10 year period. Based on a very conservative assumption, around 50% could be recovered in this period for reinvestment purposes within the first 10 years.

7.4.5 This recycling of the Fund would be able to deliver on-going benefits to the community in the form of a range of housing initiatives both in the affordable and market sectors.

7.4.6 Consideration would also need to be given to the location of schemes, likely lead in times for delivery, and the potential for funds to be recovered and recycled to deliver other housing outcomes.

7.4.7 **Table 7.2** below provides an illustration of how the Fund could prioritise/invest in various measures:

Table 7.2: Potential Housing Fund measures to deliver 'supply'

Measure and Description	Indicative Bedspaces delivered			Commentary
	Low	Mid	High	
Support rent/deposit guarantee schemes – interventions to make the market work better, and support rent deposits for people at risk of homelessness.	654			Average monthly rent for a house in Suffolk is £1,062 and flat is £728. Single room is £414. Most of the priority banding housing need is in 1 or 2 bed properties (home.co.uk, 2019). Assume this average, plus 20% would cover deposit plus damages. Assume a deposit payment would bring forward an average of 2.1 rooms. Alternatively, this could support guaranteed rents, meaning the Council pays the landlord and recoups the rent from the tenant. Would need incentive payment or up front guarantee for landlord.
Provide equity loans to residents in the owner-occupied and PRS. Initiatives funded as loans, enable money in the Fund to be recycled so that it could provide ongoing support for future housing initiatives and serve as a further legacy benefit. Housing management, enforcement and licencing support for local authorities to ensure best use of existing stock.	31			Net average household income is around £35k in most of Suffolk Coastal so mortgage of up to £140k achievable based on 4x annual income. In the east of England in 2019 the average price paid by first time buyers (CLG Live Tables) was £259k, with a mortgage of 202k and an annual income of £54k. Additional subsidy release for registered social landlords could be possible subject to how the scheme is advanced. Moving households out of social rented has the additional benefit of freeing up affordable accommodation for re-let.
Provide equity loans to residents in the social rented sector. Initiatives funded as loans, enable money in the Fund to be recycled so that it could provide ongoing support for future housing initiatives and serve as a further legacy benefit. Housing management, enforcement and licencing support for local authorities to ensure best use of existing stock.	30			Help To Buy has granted 562 loans over six years in East Suffolk at an average of c.£48,500 per loan.
Support empty homes back into use specifically as rented worker accommodation by, for	92	154	462	Live Table 123 shows that East Suffolk gains an average of 70 homes per year as a result of change of use e.g. from agricultural or commercial to

Measure and Description	Indicative Bedspaces delivered			Commentary
example, brokering relationships between owners and contractors. Improvement grants to bring properties into beneficial occupation. Funding for investigative services to identify and research empty properties and their potential for re-occupation.				residential. There are c.3,257 empty homes in Suffolk Coastal and Waveney. We assume (for the mid-point scenario) around 20 per year can be brought back into beneficial use with grants of average c.£15k per home (noting lag time of six months in the first year), with an average of 2 bedspaces per home.
Loans/grants/guaranteed lets e.g. renovation grants (c.£15k); rent agreements fixed to local housing allowance rates; assistance with minor improvements to bring forward property into PRS.	84	129	336	East Suffolk Private Housing Strategy sets out plans to redevelop and adapt 30 properties p/a over 30 years at a cost of £56m. This translates into c.£62,000 per home or around £24,000 per bedspace - though there would be variation in terms of the type of investment (grants, loans, etc.) East Suffolk offers grants of £1,000 up to £20,000 for renovation for owner occupiers, landlords and first time buyers, and minor works grants for those on low income from £1,000 to £5,000.
Help to deliver the East Suffolk Housing Strategy (2017) pledge to work with housing associations to explore opportunities for mixed schemes of private sale and affordable housing to generate profits to replace grant funding, in partnership with the private sector e.g. grant payment to subsidise provision of affordable housing developed by registered social landlords.	26	39	105	Government's Affordable Homes Programme (Oct 2017) assumes an average subsidy of £80,000 per home for social or affordable rent. Live Table 253a shows an average of 150 starts and 190 completions per quarter in East Suffolk since early 2017. Of these around 30 starts and 25 completions per quarter are housing association or local authority dwellings.
Tackling under-occupation – payment to compensate for tenant releasing property and moving to more suitable accommodation.	5	6	9	Statutory Home Loss Payments in England at £6,300 in 2018. Assume average cost of removals is £1,200 (comparemymove.com). Incentive may be c.£5,000 for flats; £15,000 for family homes. 2011 Census shows that under-occupancy occurs in 79% of all homes in East Suffolk though this varies by sector (down to 44% in social rented tenure). SHMA (2017) shows that the Ipswich Housing Market Area does not suffer from above average levels of overcrowding or concealed households. There

Measure and Description	Indicative Bedspaces delivered			Commentary
				are c.4,500 3-bed homes in the social rented sector in East Suffolk based on 2011 Census data. There could be up to c.2,000 incidences of under-occupation, but the incidence of under-occupation may be different between household size so a conservative reduction has been assumed (down to 500).
Implementation of the Funds.	N/A	N/A	N/A	Assume funding FTE position and administration/support over c.10 years
Total	922	1,043	1,627	N/A

7.4.8 The above supply measures mix could increase the supply of accommodation relative to worker demand for accommodation. The suite of measures with the potential to be used will be set out in the Section 106 agreement, and those implemented would be subject to the governance arrangements of the Housing Fund.

7.4.9 Taking the illustrative example approach set out above across each of the measures builds a picture of the potential number of outcomes and how these relate to the expected change in worker numbers. Indicatively, this would provide around 1,000 extra bedspaces including legacy or permanent provision, part of which is the creation of additional lettings from within the existing affordable stock facilitated both by moves into the intermediate or affordable rent sector and the freeing up of under-occupied properties.

b) Providing resilience for demand

7.4.10 Some initiatives in **Table 7.1** would be more reactionary dealing with demand, or could develop resilience within the housing service.

7.4.11 ESC has spent close to £700,000 from internal sources on homelessness advice and staffing in 2017/18 (Ref. 1.20). A further £355,000 was drawn from external sources including Homelessness Prevention Grant and the Rough Sleeper Grant, for example. This does not include spending on temporary accommodation, bed and breakfast and emergency response, which accounted for an additional £150,000 in that financial year.

7.4.12 SZC Co. recognises that local authorities are facing the potential for increases in demand for services as a result of legislation and policy, such as the Homelessness Reduction Act 2017 (Ref. 1.15), and may be subject to change depending on political and economic change/cycles which present significant uncertainty. Where there is evidence that the effect of the NHB construction workforce may exacerbate these effects, mitigation will be applied.

7.4.13 SZC Co. notes that the preference is to fund measures to demonstrably boost supply, which can offer a legacy benefit. However, it recognises that the distribution and accommodation demand related to NHB workers may require more reactive measures in local areas such as Leiston where demand is greater.

7.4.14 As a result, SZC Co. proposes to commit part of the Housing Fund over the lifetime of the Sizewell C Project to support and provide resilience to services, staffing, advice and short-term response such as temporary accommodation and the use of bed and breakfast accommodation. This would help to supplement existing spending set out above.

7.4.15 SZC Co. would provide a portion of the Housing Fund over the lead-up to peak and peak years of the Sizewell C Project as a contingency that ESC can draw upon for the above.

i. Supporting tourist sector growth

7.4.16 SZC Co. would provide a portion of the Housing Fund over the years leading up to peak to enable additional tourist accommodation supply to enter the market. This would enable additional capacity in the tourist sector to help provide resilience and provide legacy benefits.

7.4.17 This part of the Housing Fund would build on the provision of information (through regular communication with existing and potential new tourist accommodation providers on expanding or building new provision) set out as part of the Accommodation Management System. This would include setting out the scale and requirements of the workforce and enabling businesses to plan for accommodating workers, should they wish. This information may form part of a website, and include, for example links to the Worker Code of Conduct, shift patterns, demographics, details of Information events, and a process for liaison with SZC Co. over safety concerns.

7.4.18 This part of the Housing Fund may also support with planning, licencing and development, for example funding for ESC to investigate amendments to licencing and year-round occupancy. It may include funding of pre-application advice should a tourist provider seek to expand/develop a site with the potential for use by workers.

7.4.19 Finally, this portion of the Housing Fund could include funding for tourism businesses to increase capacity or re-design sites to accommodate additional provision, subject to coordination with the local authority.

7.5 Governance and monitoring

7.5.1 In determining how to target the Housing Fund, a range of factors have been considered including the cost, the need to deliver specific outcomes in specific locations, and the balance between providing permanent/legacy improvements to existing stock thereby developing an increase in supply, temporary solutions, and service support to indirectly reduce demands. The management of the Housing Fund would need to strike a balance between promoting more cost-effective but potentially temporary outcomes with more costly measures that have the potential for recycling and better legacy outcomes.

7.5.2 It is clear that the Housing Fund would need to be partly precautionary and applied ahead of the peak effects to ensure resilience, and partly reactive to issues as they arise.

7.5.3 The key principle would be to ensure that the Housing Fund is directed towards the areas likely to experience significant impacts but provide ESC (as the local experts) with flexibility as to how it is best used.

7.5.4 ESC are expected to continue to review the effectiveness of their response to homeless presentations and to identify the measures that are most effective in preventing homelessness. Going forward, this would provide a guide to which interventions would benefit most from the Housing Fund to avoid or reduce significant effects and would be considered on an ongoing basis through the governance of the Housing Fund, which will be secured by the Section 106 agreement (see **draft Section 106 Heads of Terms** at **Appendix J** of the **Planning Statement** (Doc Ref. 8.4)).

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