

Version 03 APPROVED BY ACCOMMODATION WORKING GROUP 08-07-24

Accommodation Working Group – Request for Approval: Change in Approach to LEEIE Caravan Park

Request for Accommodation Working Group Approval

The Accommodation Working Group is requested to approve a change in the approach to the delivery of the caravan park element of the Project Accommodation. Schedule 3, Section 4.2, para 4.2.1 of the Deed of Obligation provides for this, setting out that the LEEIE caravan park must be delivered "Unless otherwise agreed with the Accommodation Working Group".

Rather than provide 400 touring caravan pitches (assumed occupancy 600) on the Land East of Eastlands Industrial Estate (LEEIE), Sizewell C (SZC) is proposing using a mixture of chalet bedspaces at Pontins, Pakefield Holiday Village (hereafter referred to as Pontins Pakefield) and new third party touring caravan pitch provision within East Suffolk, for exclusive SZC worker use.

The Pontins Pakefield chalet accommodation will be available for exclusive SZC worker use from January 2025. A number of sites are being considered for the touring caravan pitch provision and these will require planning permission. SZC is committed to submitting a planning application(s) (either directly or via the site owner) for one or more sites in Q3/Q4 2024 and, if consented, to delivering this additional accommodation as soon as possible and before the date on which the Deed of Obligation requires the LEEIE Caravan Park to be delivered, which is anticipated to be December 2025.

While SZC is committed to expediting delivery of the touring caravan provision, as a precautionary measure and to ensure consistency with the current Deed of Obligation drafting, SZC is also proposing a recalculation of the Housing Fund Contingency Payment in the event that there should there be any delay in delivery, for example, due to not securing planning consent and having to make applications for other sites. Should the payment need to be made, this will not alter SZC's commitment to expedite the delivery of the touring caravan capacity as quickly as possible.

Pursuant to paragraph 4.2.1 of Schedule 3 to the Deed of Obligation, the Accommodation Working Group is requested to approve:

- a) The principle that the LEEIE Caravan Park is not provided.
- b) That provision of 399 chalet bedspaces at Pontins Pakefield and 134 touring caravan pitches (equivalent to 201 bedspaces at 1.5 occupancy) at a third party caravan park site or sites within East Suffolk, provided these spaces are additional to current provision and exclusively for SZC worker use, would be an acceptable alternative to the LEEIE Caravan Park.
- c) That payment from the Housing Contingency Fund will only apply to any shortfall in bedspaces delivered as set out in b) above.



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Accommodation Strategy

The socio-economic assessment which was submitted to support the application for development consent included an Accommodation Strategy which set out that the project would seek to strike a balance between workers using existing local accommodation - in order to deliver local economic benefits - with the need to avoid impacts on the local accommodation market by providing temporary project accommodation, including a single, 2,400 bed accommodation campus on the main development site and a 400 pitch caravan park on the Land East of Eastlands Industrial Estate (LEEIE Caravan Park). The LEEIE Caravan Park had an assumed occupancy of 600 (1.5 people per caravan).

The reasons for the provision of the caravan park were:

- To pro-actively meet an anticipated demand for civils construction workers seeking to bring their own caravans (as is the case for other construction projects, including HPC).
- To avoid unlicensed sites coming forward to fill a gap in the market, requiring enforcement action.
- To provide project accommodation before the campus is operational.
- To provide a choice of project accommodation once the campus is operational.

Deed of Obligation

The delivery of the caravan park is secured in the Deed of Obligation, Schedule 3, which states:

4.2 LEEIE Caravan Park

- 4.2.1 Unless otherwise agreed with the Accommodation Working Group, SZC Co shall:
- (A) use reasonable endeavours to deliver the LEEIE Caravan Park in accordance with the Implementation Plan; and (B) complete the LEEIE Caravan Park within three months of the LEEIE Date.
- 4.2.2 In the event of a breach of paragraph 4.2.1(B), SZC Co shall pay to East Suffolk Council from the Housing Contingency Fund up to £1,050,000 as determined in accordance with paragraph 4.2.3, to be used by East Suffolk Council to support the delivery of tourist accommodation capacity in accordance with the approved Tourist Accommodation Plan.
- 4.2.3 The amount payable by SZC Co pursuant to paragraph 4.2.2 shall be calculated in accordance with the following formula:

Amount Payable = £1,750 x (600 – Bedspaces Delivered) where:

"Amount Payable" is the amount of money required to be paid; and

"Bedspaces Delivered" is the number of bedspaces practically completed by SZC Co within the LEEIE Caravan Park on the date given in paragraph 4.2.1(B).

4.2.4 SZC Co's maximum liability pursuant to this paragraph 4.2 is £1,050,000.



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"LEEIE Date" means the date of the workforce survey carried out by SZC Co pursuant to paragraph 7.2.2 which first reports that the number of NHB Workers is more than 850.

Workforce surveys are currently planned to take place in July and January each year and the Deed allows 2 months from the close of the survey for reporting. Adding on 3 months (as the caravan park needs to be delivered within 3 months of the LEEIE Date), it is anticipated that the date for delivery as required by the Deed would most likely be December 2025.

Reasons for Change

There are 2 key drivers for the change in approach:

- The LEEIE Caravan Park was designed to maximise the number of caravans. Feedback from the Hinkley
 Point C (HPC) project team who have subsequently moved over to work on SZC is that there is insufficient
 space to create a good quality living environment akin to the HPC offering at Quantock Lakes / Brean Sands
 Holiday Park.
- The land at LEEIE can be utilised in a more efficient way to support the construction of SZC.

Alternative Approach

The following alternative approach is proposed:

Pontins Pakefield Chalet Accommodation

A licence agreement has been entered into with Britannia Hotels for workforce accommodation facilities at Pontins Pakefield. This will provide the SZC workforce with managed accommodation services consisting of 513 chalets (single occupancy), catering, bars and leisure facilities. Exclusive use of the site is set to start from January 2025 and will be for the duration of the SZC construction period.

It is considered that Pontins Pakefield would provide a popular accommodation option for non-home-based workers at SZC, including those who might otherwise have used the LEEIE Caravan Park. The use of Pontins, Pakefield would replicate the contract HPC established with Britannia (Pontins) in 2021 for Brean Sands, where high levels of occupancy are consistently achieved. In addition, in the period between January 2023 and January 2024 when Brean Sands opened to HPC workers, the ratio of workers in caravans reduced (suggesting workers who would otherwise have used caravan accommodation have used Brean instead).

One of the key reasons that workers seek touring caravan pitches is cost and the ability to retain some of the money from their worker allowance each month. Accommodation at Pontins Pakefield would be offered at a reasonable cost within pre-determined worker allowances in the local area. Direct bussing to and from the SZC site would be provided and workers would receive a bussing allowance. Experience from HPC indicates that cost (including the ability to save money on the accommodation allowance via the bussing allowance) and convenience (being able to get on a bus straight to and from site) are particularly important to workers.



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SZC is proposing that two thirds of the alternative provision is provided by chalets at Pontins Pakefield, totalling 399 bedspaces.

Touring Caravan Provision

SZC recognises that there will remain some demand for touring caravan provision and is in discussions with a number of providers within East Suffolk which have the potential for expansion of their sites to provide new touring caravan pitches for exclusive SZC worker use.

Planning permission would be required for the provision of additional caravan pitches and SZC would look to expedite these as quickly as possible. In the first instance, SZC will shortly be consulting with East Suffolk Council's planning team with a view to progressing one of more sites and submitting a planning application in Q3/Q4 2024 (either directly or via the site owner) for one or more sites and, if consented, to delivering this additional accommodation as soon as possible and before the date on which the Deed of Obligation requires the LEEIE Caravan Park to be delivered, which is anticipated to be December 2025.

SZC is proposing that a third of the alternative provision is provided by additional touring caravan pitches, totalling 134 pitches (equivalent to 201 bedspaces at 1.5 people per caravan occupancy).

Housing Fund Contingency Payment

Even though approval of the alternative approach would mean that paragraph 4.2.1(B) is not breached and so no payment falls due under paragraphs 4.2.2 and 4.2.3, it is still proposed that a payment from the Housing Contingency Fund would be made as part of the alternative approach in the unlikely event that any of the 600 bedspaces are not delivered in time. It is proposed that such payment would be calculated in accordance with the following formula:

Amount Payable = £1,750 \times (600 – Bedspaces Delivered) where:

"Amount Payable" is the amount of money required to be paid; and

"Bedspaces Delivered" is the number of bedspaces practically completed or contracted for by SZC Co comprising chalet bedspaces at Pontins Pakefield and new third party caravan pitch provision at Pontins Pakefield or on another third party site for exclusive SZC worker use within East Suffolk on the date given in paragraph 4.2.1(B), provided that no more than 399 bedspaces may comprise chalet bedspaces at Pontins Pakefield for the purposes of this calculation.

In any event, SZC's maximum liability pursuant to paragraph 4.2 of the Deed of Obligation is £1,050,000.