

The Great Grid Upgrade

Sea Link

# Sea Link

Volume 9: Examination Submissions

Document 9.117: Applicant's Response to AP104 from Issue Specific Hearing 2

Planning Inspectorate Reference: EN20026

Version: A  
February 2026

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# 1. Introduction

1.1.1 This submission provides the Applicant's Response to AP104 from the Issue Specific Hearing 2. The Examining Authority (ExA) requests the Applicant to:

*'Outline the worst-case level of rental accommodation levels that may be required for workers in Suffolk and Kent for Sea Link, considering the cumulative number of other development workers that may also require accommodation'*

1.1.2 The Applicant's response summarises the work that has been undertaken to date as detailed within the Environmental Statement (ES) (**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1-005]**, **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1-007]** and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**).

1.1.3 Additional analysis has subsequently been undertaken which:

- Uses the most up-to-date data sources;
- Incorporates information from additional cumulative schemes;
- Factors in rental costs when considering availability of visitor accommodation;
- Outlines the worst-case level of rental accommodation levels that may be required for cumulative schemes;
- Notes the impact of Sizewell C; and
- Describes potential commitments to help alleviate concerns for the Suffolk Coastal settlements.

1.1.4 The additional analysis concludes, in a worst case, that there is likely to be capacity within the private rental accommodation sector for construction workers of cumulative schemes that require accommodation.

## 2. Accommodation Assessment

### 2.1 Assessment of Effects for the Proposed Project

- 2.1.1 The Applicant has undertaken an assessment of accommodation capacity within a defined study area as part of the ES, as detailed in **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1-005]** and **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1-007]**.
- 2.1.2 The potential accommodation stock comprises private rental homes, hotels, bed and breakfast and inns. This analysis concluded that in a worst-case scenario at peak workforce employment and typical seasonal occupancy levels, all of Suffolk and Kent Onshore Schemes' construction workers could be accommodated within 60-minute drive times of the Order Limits.

### 2.2 Cumulative Effects Assessment

- 2.2.1 **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** presented an assessment to evaluate whether existing tourism and private rental accommodation within a 60-minute drive of the **Suffolk Onshore Scheme** could meet demand from peak construction workforces from cumulative schemes.
- 2.2.2 In July 2028, there is anticipated to be a total peak of 3,415 non-homebased construction workers requiring accommodation. This includes the peak construction workforce from the Suffolk Onshore Scheme that are likely to require accommodation (229 non-homebased construction workers). This peak lasts for one day (as a comparison for the peak year (2028), an average of 115 construction workers is anticipated per day while an average of 60 construction workers is estimated to be required onsite per day over the entire construction period).
- 2.2.3 For the purposes of the assessment and taking a precautionary approach, all these construction workers are assumed to be Full time equivalents (FTEs). However, in practice, a proportion of these workers will be part-time and therefore unlikely to relocate and require accommodation facilities. After accounting for seasonal demand, a total stock of 10,617 rooms<sup>1</sup> is available within tourist accommodation and private rental accommodation within a 60-minute drive-time area. Based on these statistics, there is accommodation capacity availability of 68%.
- 2.2.4 The assessment concluded that in a worst-case scenario there is unlikely to be a significant cumulative effect on local accommodation capacity.
- 2.2.5 An assessment of cumulative effects from construction workforce impacts on existing tourism and private rental accommodation was not scoped into the **Kent Onshore Scheme** given it was not considered to have likely significant environmental effects. For completeness, the Applicant has now undertaken this work.

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<sup>1</sup> For the purposes of this assessment, for private rental accommodation a dwelling has been captured as a room. Given this, the total stock of available rooms is likely to be higher.

2.2.6 In July 2028, there is anticipated to be a total peak of 799 construction workers requiring accommodation which includes the peak construction workforce from the Kent Onshore Scheme that are likely to require accommodation (169 non-homebased construction workers). After accounting for seasonal demand, a total inventory stock of 13,877 rooms is available within tourist accommodation and private rental accommodation within a 60-minute drive time area. Based on these statistics, there is accommodation capacity availability of 94%.

## 2.3 Additional Accommodation Analysis

2.3.1 The Applicant has undertaken further analysis to inform potential accommodation capacity from a worst-case perspective.

2.3.2 Data sources have been updated to reflect an up-to-date position. The Applicant has also reviewed potential accommodation allowances for construction workers to establish tourist accommodation which is likely to be affordable. Workers are likely to be eligible for an accommodation allowance under the National Agreement for the Engineering Construction Industry (NAECI) or the Construction Industry Joint Council (CIJC). In 2025, the daily allowance under the NAECI was £50.81 per night and £355.67 per week.

2.3.3 Co-star was used to identify hotels, bed and breakfasts and inns within a 60-minute study area for both the Suffolk and Kent Onshore Schemes. Co-star uses a class category (luxury, upper upscale, upscale, upper midscale, midscale and economy) to group hotels according to actual average room rates. For the purposes of this analysis, and adopting a precautionary approach, only hotels that have the lowest cost classification "economy" have been included as potential accommodation which could be used by construction workers.

2.3.4 The peak construction workforce for the cumulative schemes associated with the **Suffolk Onshore Scheme** (Sizewell C, East Anglia ONE North and East Anglia Two Offshore Windfarms, LionLink Interconnector and Norwich to Tilbury Electricity Transmission) has changed since the submission of the ES with further information now gathered from the LionLink Interconnector scheme and the Norwich to Tilbury National Grid project. As a result, in July 2028 the peak construction workforce of the cumulative schemes requiring local accommodation is now estimated to total 3,915. After accounting for seasonal demand, a total inventory stock of 10,095 rooms is available within tourist accommodation and private rental accommodation within a 60-minute drive-time area. Based on these statistics, there is accommodation capacity availability of 61%.

2.3.5 In July 2028, the peak construction workforce for the cumulative schemes associated with the **Kent Onshore Scheme** is anticipated to be a total peak of 799 construction workers requiring accommodation. After accounting for seasonal demand, a total inventory stock of 12,681 rooms is available within tourist accommodation and private rental accommodation within a 60-minute drive time area. Based on these statistics, there is accommodation capacity availability of 93%.

## Private Rental Accommodation Levels

2.3.6 The Applicant has provided an assessment which considers the extent to which existing tourism and private rental accommodation within a 60-minute drive of the Suffolk and

Kent Onshore Schemes could meet demand from construction workforces of cumulative schemes.

2.3.7 Private rental accommodation makes up a significant percentage of the available inventory stock. For the Suffolk Onshore and Kent Onshore Schemes, this represents 9,742 and 12,105 rooms available respectively, equivalent to 96.5% and 94.8% of the total available accommodation stock after accounting for seasonal demand.

2.3.8 The above figures have been informed by the English Housing Survey (latest version 2024) which indicates that, nationally<sup>2</sup>, 11% of properties within the private rental sector are vacant. For the purposes of the assessment, private rental sector vacancy was assumed at 10% while a precautionary approach was adopted which assumes only 75% of these vacant properties would be available for rent.

2.3.9 Table 1 presents the worst case of rental accommodation levels that may be required by the peak construction workforce for the Suffolk and Kent Onshore Schemes, whilst considering cumulative schemes. The rental accommodation requirement for both schemes will depend on the extent to which non-homebased workers from cumulative schemes take up the remaining stock of tourism accommodation. Therefore, the private rental accommodation requirements could range from:

- Suffolk 0-229 construction workers requiring accommodation; and
- Kent 0-169 construction workers requiring accommodation.

**Table 1 Construction workers requiring accommodation (assuming 10% vacancy private rental stock)**

Content	Construction workers requiring accommodation for the Proposed Project	Cumulative Schemes requiring accommodation	Tourism accommodation available stock	Private rental accommodation available stock
Suffolk	229	3,915	353	9,742
Kent	169	799	666	12,105

2.3.10 The English Housing Survey does not account for seasonal fluctuation. However, while the average vacancy rate for private rental accommodation is 11%, industry data from the Goodlord Rental Index suggests that during a summer “peak” vacancies rate could potentially drop to 8-10%. The Applicant has modelled a scenario where private rental accommodation vacancy falls to 8%. Under such a scenario, for the Suffolk Onshore and Kent Onshore Schemes, there is accommodation capacity of 52% and 92% respectively. Therefore, in this scenario, there is still sufficient stock of private rental accommodation to meet the demand from the cumulative schemes.

<sup>2</sup> The English Housing Survey provides these figures at national level. It does not provide figures at lower geographical levels as it has not been deemed to be statistically reliable.

## 2.4 Sizewell C Impact

2.4.1 Sizewell C has the longest construction period of the cumulative schemes, spanning 2025 to 2037. Up to 2,000 workers from 2027 onwards will potentially require accommodation within the private rental and tourist accommodation sectors.

2.4.2 It is evident that any potential future constraints placed on accommodation capacity over the period in which the cumulative schemes associated with the Suffolk Onshore Scheme coincide would be largely due to the scale of the Sizewell C project<sup>3</sup>. The Applicant notes that of the 3,915 peak cumulative construction workers requiring accommodation, 51.1% are required for Sizewell C, whilst in comparison the Proposed Project only accounts for 5.8% (229 workers) of the cumulative demand. The percentage associated with the Proposed Project is likely to be less than 5.8%, given a proportion of these 229 workers are likely to be part time and are unlikely to require accommodation. In addition, 229 workers represent a one-day peak during the entire construction phase. This number reduces to 115 workers per day for the peak construction year (2028) and to 60 workers per day for the average across the entire construction period.

## 2.5 Coastal Settlements and Commitment

2.5.1 The Applicant recognises that the presence of several infrastructure schemes in proximity to Suffolk's rural coastal settlements and the resulting demand for worker accommodation could potentially create constraints in the supply of visitor and private rental accommodation within these areas, particularly established tourist destinations such as Aldeburgh, Southwold, Saxmundham and Thorpeness. It is considered unlikely, however, that construction workers would routinely utilise the coastal boutique and higher-end hotels within these areas.

2.5.2 The Applicant recognises these concerns regarding accommodation capacity. For works in Suffolk, the Applicant will establish a process to monitor where workers are staying by type of accommodation and location on a quarterly basis. If potential constraints arise, the Applicant will consider whether there are steps that can be taken to encourage more workers to stay in accommodation less commonly used by tourists to the coast (e.g. accommodation in Ipswich). The Applicant will build on existing discussions with Sizewell C and other developers in the Suffolk area about shared use of specialist accommodation or encouraging use of accommodation in a larger settlement such as Ipswich with financial incentives and/ or transport from Ipswich to work locations.

2.5.3 The Applicant also acknowledges the proximity of the Proposed Project to coastal settlements in Kent, including Ramsgate. While no material constraint on accommodation capacity is anticipated, a precautionary approach will be adopted, and the Applicant will liaise with relevant local planning authorities where appropriate.

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<sup>3</sup> It should be noted that Sizewell C's accommodation strategy is based on a wider labour catchment, including a 90-minute travel area that extends beyond the 60-minute study area applied for the Proposed Project. As such, Sizewell C will have access to rental accommodation markets outside the Proposed Project's study area, thereby reducing direct overlap in accommodation demand and limiting the extent to which pressures would be concentrated within the same local geography.

## 2.6 Conclusion

- 2.6.1 In response to the ExA's request, the Applicant has undertaken a robust worst-case assessment of the potential effects of the Suffolk and Kent Onshore Schemes on private rental and tourist accommodation, which also considers the cumulative number of other development workers that may require accommodation.
- 2.6.2 The Applicant's assessment concludes that the existing accommodation supply is sufficient to accommodate peak cumulative demand. In Suffolk, approximately 61% of total available accommodation capacity is anticipated to remain available at peak demand. In Kent, approximately 93% of total available accommodation capacity is anticipated to remain available at peak demand.
- 2.6.3 The Applicant remains committed to proportionate monitoring of accommodation demand during construction and to ongoing engagement with relevant stakeholders. In the event where unforeseen pressures on local accommodation arise, the Applicant will consider appropriate and proportionate measures to support the effective management of accommodation demand.

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