



Sizewell C
DCO Written Representation
Part 2 – SZC Policing Impact Assessment
Suffolk Constabulary

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1 Introduction

1.1 Introduction

1.1.1 This Policing Impact Assessment ('PIA') forms Part 2 of the Written Representation ('WR') submitted by Suffolk Constabulary regarding the Sizewell C ('SZC') Development Consent Order ('DCO') application. The WR builds directly on a Relevant Representation submitted by Suffolk Constabulary ('the Constabulary') in September 2020, which formally registered the Constabulary as both an Interested Party and a Statutory Party in the Examination of the SZC DCO application. In doing so, the WR sets out the Constabulary's full case regarding the assessment and mitigation of likely community safety and policing impacts from the SZC project.

1.1.2 The Constabulary's WR comprises three elements:

- Part 1 - Summary
- Part 2 – SZC Policing Impact Assessment (PIA): sets out the Constabulary's assessment of the likely community safety and associated policing impacts of the proposed Sizewell C (SZC) project (**this document**)
- Part 3 - Collated comments regarding the assessment and acceptability of community safety impacts as predicted by the scheme promoter, NNB GENERATION COMPANY (SZC) Ltd (hereafter 'the Applicant'), in the published SZC DCO application (May 2020 as updated).

1.1.3 In addition to providing the WR at Deadline 2, the Constabulary has also submitted responses to relevant Written Questions asked by the Examining Authority ('ExA'). For brevity these responses cross-refer to relevant sections of this PIA where full details of the Constabulary's position regarding likely community safety and policing impacts are set out.

1.2 Purpose and Objectives

1.2.1 The Constabulary holds no views as to the virtues of nuclear energy or the merits of the proposed development itself. In responding to the SZC DCO application, the Constabulary is solely concerned with ensuring all likely significant impacts relating to community safety and policing arising from SZC are fully identified, assessed, and adequately mitigated. As noted within their Relevant Representation, the Constabulary's objectives in relation to the Examination and determination of the SZC DCO application are to:

- Understand and address the full range of likely community safety and policing impacts from SZC. Acting as a statutory consultee, the Constabulary will be pleased to assist the ExA in considering these matters fully; and

- Secure adequate and appropriate mitigation, including additional police resourcing, to avoid likely significant adverse community safety impacts and any other unacceptable community safety risks, including in relation to both local policing and roads policing. The cost of providing adequate additional police resourcing to help mitigate community safety impacts from the SZC project should not be borne by existing taxpayers in Suffolk¹.

1.2.2 This WR supports the discharge of the Constabulary's roles as an Interested Party and a Statutory Party under the Planning Act 2008 by identifying likely community safety impacts from the SZC project. It presents the findings of detailed modelling undertaken to predict associated policing resource demands and identify mitigation requirements.

1.3 Summary of Suffolk Constabulary Concerns

1.3.1 As a major infrastructure project involving a long construction period and large non homebased ('NHB') construction workforce, the SZC project will generate substantial demographic and traffic changes in Suffolk, together with additional health and safety risks and the likely occurrence of protests. These are all likely to generate net additional community safety impacts and policing demands which the Constabulary and partner agencies would need to manage. Such impacts extend well beyond what may be perceived as deterring and investigating traditional crime types to include prevention, deterrence, safeguarding, incident response and investigation roles in relation to both crime and non-crime related community safety incidents.

1.3.2 As noted in their Relevant Representation, the Constabulary raised concerns with the Applicant at multiple pre-application and pre-Examination stages regarding the adequacy of consideration afforded to community safety and policing matters. From the outset and throughout the process to date, major concerns expressed by the Constabulary relate to:

- Narrow scope of assessment - the singular focus of the small policing impact assessment on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than assessing wider community safety impacts likely to require police involvement.
- Limited consideration of demographic factors – the assessment of population dynamics undertaken in Chapter 9 – Socio-economics of the Environmental Statement ('ES') does not appear to have been factored into the assessment of resulting community safety impacts.
- Over reliance by the Applicant upon the perceived experience of the construction of Hinkley Point C ('HPC') project within the Avon and

¹ Existing police funding mechanisms (Council tax and Home Office grant calculated on a per capita resident basis using ONS data) will not capture much of the required Non-Home Based (NHB) SZC workforce, meaning that without adequate additional funding being provided by the Applicant, policing services for this component of the workforce would be unfunded.

Somerset Police area to seek to predict community safety and policing impacts from the SZC project in Suffolk. This approach is not appropriate as baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different and due to weaknesses in the recording of policing demands arising from HPC.

- In consequence it is also not appropriate to replicate incident modelling or police resourcing mitigation between the projects; a bespoke solution based on evidence relevant to Suffolk and aligned with the Constabulary's operational approach is instead required.

1.3.3 At the time of writing these concerns remain unresolved, as indicated in the draft Statement of Common Ground ('SoCG') between the Constabulary and the Applicant submitted at Deadline 2. The issues have resulted in gaps in the Applicant's assessment of likely significant effects on community safety and policing (discussed further within Part 3 of the Written Representation).

1.3.4 In the absence of a full assessment having been provided within the submitted Environmental Statement ('ES') or otherwise agreed to date, the Constabulary considers that the effectiveness, quantum and delivery of community safety mitigation and monitoring required to avoid likely significant adverse effects (including specifically additional resourcing for the Constabulary) still requires to be confirmed and secured. Acting as a Statutory Party to the Examination, the Constabulary requires adequate, appropriate and effective mitigation and associated monitoring to be secured through this Examination prior to the determination of the DCO Application for the SZC project.

1.4 Need for and Preparation of this PIA

Need

1.4.1 To help address the identified assessment gaps it was agreed between the Applicant and the Constabulary that the Constabulary, as the subject matter experts for policing, should undertake an independent assessment of likely community safety and associated policing resourcing impacts. This PIA, which forms the second element of the Constabulary's WR as detailed in this report, utilised projected SZC workforce and traffic data provided by the Applicant.

1.4.2 At this stage, the parties have not been able to agree on the approach to modelling likely community safety impacts (crime and non-crime incidents) and associated policing demands attributable to the SZC project and associated workforce. In consequence the level of additional police resourcing required to help mitigate likely community safety impacts has also not been agreed.

1.4.3 The PIA prepared by the Constabulary has therefore necessarily been submitted in full (rather than only summary conclusions being drawn from it) to the ExA as part of this WR in order to evidence the Constabulary's strong views regarding:

- Community safety and policing impacts likely to arise from the SZC project;

- Why the Applicant's reliance upon data collated for the HPC project to attempt to predict policing impacts from SZC in Suffolk is flawed;
- The need for a bespoke mitigation for the SZC project in Suffolk and why it is inappropriate to replicate mitigation proposals from the HPC project as the Applicant has proposed; and,
- The need for adequate and effective mitigation and monitoring to be secured through the terms of any DCO granted (and associated Section 106 Agreement) for the project. This mitigation solution must be adequate, effective and appropriate for the SZC project in Suffolk.

Preparation including Engagement with the Applicant

- 1.4.4 The Constabulary has engaged with the Applicant throughout all pre-application and pre-Examination stages of consultation and continues to do so, including through topic-based meetings and written requests for clarifications. The Constabulary has also participated in meetings of the Emergency Service Working Group and Community Forum convened by the Applicant and has maintained regular dialogue with other consultees concerned with the management of community safety impacts. These engagement activities have informed the Constabulary's assessment of likely community safety and policing impacts and the need for adequate mitigation to be secured, as set out in this PIA.
- 1.4.5 Previous drafts of the PIA which now forms part of the Constabulary's WR were shared with the Applicant for review and to facilitate discussions around the preparation of an initial SoCG (as submitted at Examination Deadline 2). All feedback received from the Applicant was carefully considered and informed several refinements to the Constabulary's PIA as described in Appendix A.

1.5 Requests of the DCO Examining Authority

- 1.5.1 At the time of submission there remains clear differences between the positions of the Constabulary and the Applicant as detailed in this WR. The ExA will therefore need to consider the acceptability of likely community safety and policing impacts and associated mitigation requirements, including additional police resourcing, as part of the Examination.
- 1.5.2 For the reasons set out in this WR, the ExA is respectfully asked to endorse the following positions held by the Constabulary and to ensure these are applied by the Applicant:
- Any assessment of likely policing impacts must be based on reliable data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project;

- It is therefore inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group ('SEAG') as the basis for assessing likely community safety and policing impacts from the SZC project in Suffolk;
- The development of community safety mitigation measures, including the quantum and structure of additional police resourcing, must be adequate, effective and appropriate for the policing context of the SZC project in Suffolk;
- To be effective officers need to be based in the community, integrated with the Constabulary's existing resources (e.g. Safer Neighbourhood and Response Teams) and available across all shift patterns. Additional resourcing in specialist roles outside of Local Policing ('Beat') teams will also be required to address the net additional policing demand generated by the SZC project; and,
- It is therefore inappropriate to replicate the on-site 'Beat Team' approach to policing mitigation adopted at HPC for the SZC project in Suffolk; and,
- Instead, the quantum and structure of additional police resourcing identified by the Constabulary through this PIA as being necessary to help mitigate likely community safety impacts over the build period of the SZC project should be funded by the Applicant. Robust monitoring and adequate contingency funding also needs to be secured through the SZC Public Services Resilience Fund (Section 106 Agreement) to address additional potential community safety risks.

1.5.3 As intimated at the Preliminary Meeting of the Examination, given the identified deficiencies in the Applicant's impact assessment and due to differences between the Constabulary and the Applicant regarding associated mitigation requirements, the Constabulary is of the view that there the assessment and mitigation of community safety impacts needs be examined further through Issue Specific Hearings. Matters which could usefully be addressed through a hearing as part of the Socio-Economic Principal Issue in relation to law and order considerations include the range of likely impacts on the workforce and local communities, the role of the emergency services in addressing these impacts and the need for adequate, effective and appropriate mitigation to be provided by the Applicant.

1.6 Written Representation Structure

1.6.1 The remainder of this WR is structured as follows:

- **Section 2 – Suffolk Constabulary Overview** provides an overview of policing in Suffolk, highlighting key characteristics which need to be taken account of in assessing likely community safety and policing impacts from the SZC project and identifying mitigation requirements.

- **Section 3 – Pertinent Differences between Suffolk and Avon & Somerset** highlights key operational differences between the force areas and policing models to illustrate that it is not appropriate to replicate the policing mitigation approach between the HPC and SZC projects as the Applicant has proposed.
- **Section 4 – Community Safety Impacts from the Sizewell C Project** identifies the community safety impacts that the Constabulary consider are likely to occur from SZC which will require policing involvement or management to avoid residual significant adverse effects or other unacceptable community safety risks.
- **Section 5 – Concern's Regarding the Applicant's Approach** outlines the Constabulary's main concerns with the approach adopted by the Applicant to date in the consideration of likely community safety and policing impacts from SZC. Further comments regarding the assessment, mitigation and acceptability of likely community safety impacts as predicted by the Applicant are provided in Part 3 of the WR.
- **Section 6 - Suffolk Constabulary Police Resourcing Assessment Methodology** details the approach adopted by the Constabulary to undertake an independent assessment of likely community safety and associated policing resourcing impacts from the SZC project.
- **Section 7 - Population Based Community Safety and Policing Impacts** outlines the Constabulary's current demand and resourcing structure in respect of three main impacted policing functions before setting out forecasted additional resourcing demands likely to be generated by the SZC construction workforce.
- **Section 8 - Construction Traffic Based Community Safety and Policing Impacts** outlines forecasted additional roads policing demands likely to be generated by the construction phase of the SZC project.
- **Section 9 – Mitigation and Monitoring** confirms the quantum, structure and phasing of additional resourcing identified through this PIA as being required to help mitigate likely community safety impacts from the SZC project.

2 Suffolk Constabulary Overview

2.1 Introduction

- 2.1.1 This section provides an overview of policing in Suffolk, highlighting key strategic and operational characteristics which need to be taken account of in assessing likely community safety and policing impacts from the SZC project and identifying mitigation requirements. It begins with a brief discussion regarding the context in which police forces operate, before describing the operational structure and current capacity of the Constabulary.

2.2 National Context

- 2.2.1 Policing across England and Wales is provided by 43 territorial autonomous police forces. For most forces, their geographical responsibility is synonymous with the county borders. For a small number there are two or more counties covered. The College of Policing and the National Police Chiefs Council ('NPCC') ensure standardisation of policing delivery across the UK but the way in which individual police forces are structured and resourced differs significantly dependant on demand, community needs and geography.
- 2.2.2 The Policing Protocol Order 2011 establishes the position of elected Police and Crime Commissioners ('PCC') and their respective Chief Constables in law. Chief Constables are charged with the impartial direction and control of all constables and staff within the police force that they lead. The Chief Constable holds office under the Crown but is appointed by the PCC for their force area. At all times the Chief Constable, their constables and staff remain operationally independent in the service of the communities that they serve.

2.3 Policing in Suffolk – Operational Model

Overview

- 2.3.1 The Constabulary has the responsibility for policing the county of Suffolk and has a mission to make Suffolk a safe place to live, work, visit and invest. Under the leadership of the Chief Constable, the Constabulary uses its resources to protect its communities and prevent crime happening in the first place, with a particular focus on preventing harm and protecting the most vulnerable in our communities. This is articulated in the Constabulary's Strategic Plan 2020 - 2023. The Suffolk PCC is responsible for setting policing objectives and does this through his Police and Crime Plan.

2.3.2 The Constabulary has an establishment of 1,219 FTE police officers and 40 Police Community Support Officers ('PCSO')² and over 872 police staff. In 2019³, the force dealt with:

- 80,102 incidents and investigations. It should be noted that incidents often require multiple resources and multiple teams to be involved.
- 110,448 emergency (999) calls and 132,847 non-emergency (101) calls.
- 10,758 detentions and 12,864 online crime and intelligence reports submitted through the Constabulary web portal.

2.3.3 The demands on policing have changed over the last five years with greater focus and emphasis placed on vulnerability and hidden harm. This has led to increasingly complex challenges to keeping communities safe and protecting vulnerable people, which are exerting pressure across the organisation and facilitated a shift towards Neighbourhood Policing.

Policing Structure

2.3.4 Suffolk's local policing structure comprises of two Commands. County Policing Command ('CPC') and Crime, Safeguarding and Investigation Management ('CSIM'). The CPC is comprised of the following functions:

- **Response Policing:** Neighbourhood Response Teams ('NRTs') predominantly respond to calls for service into the force Contact and Control Room ('CCR'). On the whole these will be calls requiring an immediate or timely response.
- **Neighbourhood Policing:** Safer Neighbourhood Teams ('SNTs'), supported by Neighbourhood Partnership Teams address those less time critical calls and undertake longer term work to problem solve crime, anti-social behaviour, and other community safety issues, often working closely with a range of local partner agencies.

2.3.5 The importance of the shift to Neighbourhood Policing has been outlined by the Government and policing bodies both in relation to Suffolk and nationally. This style of policing, which moves beyond traditional enforcement and investigation, is critically important to the policing model in Suffolk as it is integral to maintaining public trust and confidence in the force.

2.3.6 Whilst much of policing demand is dealt with through Response Policing, this must be considered part of the local policing structure in the same way that

² Data as of March 2020 Home Office data: Police Workforce, England and Wales: 31 March 2020: data tables second edition. Sourced from <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2020>

³ 2019 baseline policing data is used in this Policing Impact Assessment as 2020 data is significantly affected by the impacts of the COVID-19 pandemic (including the associated emergency response) and is therefore not representative of pre-2020 baseline conditions.

SNTs operate. SNTs play an important role in helping to address local hidden harm including domestic abuse, child protection, and sexual offences.

Area Commands

- 2.3.7 The Constabulary operates as a single Basic Command Unit ('BCU'). The BCU is led by a Chief Superintendent. The county BCU is then divided into three 'Area Commands' each led by a Superintendent⁴. Within the three Command Areas, Neighbourhood Response Teams (NRTs) operate from nine bases across the County. The NRTs operate a five-shift pattern to provide an early, late, and night shift seven days a week. There are nine response teams operating across the county at any one time to ensure sufficient resources at the right locations to respond to any calls for service.
- 2.3.8 Each Command Area is also split into several SNT areas; there are 18 SNT areas across the County. Each NRT and SNT is made up of Police Constables and Police Sergeants. Police Inspectors have responsibility for a number of NRTs or SNTs. The SZC main development site lies within the Eastern Command Area, the Halesworth Local Policing Command ('LPC') and the Leiston SNT.

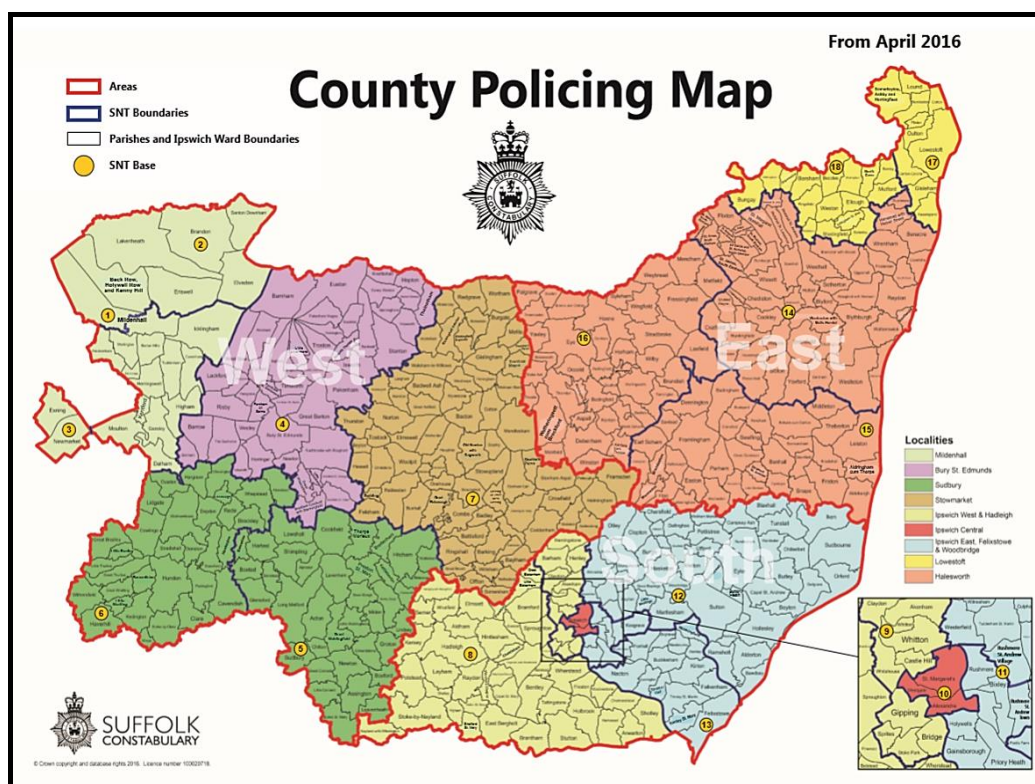


Figure 2.1: Suffolk Constabulary Operational Areas

⁴ Area Commanders are responsible for the performance in their area, the deployment of resources and for maintaining and building strong strategic and operational partnerships with other agencies and organisations.

Crime, Safeguarding and Investigation Management

2.3.9 Detective resources at a local policing level are primarily based within the main police station of each of the three Area Commands, with the detective resources that cover the locality of Leiston therefore based at Lowestoft Police Station. All crime management functions are centrally located for the Constabulary at Police Headquarters, Martlesham Heath.

Other Policing Functions

2.3.10 Other policing functions include:

- **Roads and Armed Policing:** teams operate from five operating bases across both Norfolk and Suffolk. Armed and roads policing for Leiston is based at Police Headquarters at Martlesham. Strategic Threat and Risk Assessments ('STRAs') are undertaken for both Armed and Roads policing functions and these dictate the level of cover provided over each part of the day.
- **Intelligence and specialist crime functions:** these functions are both area and centrally based. For Leiston this would either be Lowestoft Police Station or Police Headquarters in Martlesham.
- **Custody facilities:** located at three Police Investigation Centres (PICs) at Martlesham, Bury St Edmunds, and Gorleston in Norfolk. Persons arrested in the Leiston area may be taken to any of three PICs depending on capacity but in most cases this will be either Martlesham or Gorleston.
- **Forensic Services:** provided from either Lowestoft Police Station or from Landmark House on the A14 south of Ipswich.

2.3.11 The Constabulary works in close collaboration with Norfolk Constabulary and several functions, both operational and support are shared between the two forces. Collaborated units include Finance, Human Resources, Estates and Fleet within the support functions and Intelligence, Roads and Armed Policing, Major Crime and Criminal Justice in the operational functions. This is not an exhaustive list of shared functions.

Policing in Halesworth and Leiston

2.3.12 The SZC main development site is located within the Constabulary's Halesworth Local Policing Command ('LPC') area, itself within the Constabulary's Eastern Command Area. These are defined on an operational basis, taking account of factors including emergency response times and population centres.

2.3.13 Five NRTs are assigned to the Halesworth LPC to provide a 24/7 response, all operating out of Halesworth Police Station. Leiston, together with other pockets within the Eastern Command Area and Halesworth LPC, has long been

recognised as an area faced with multiple deprivation and has specific policing needs above that of other more affluent areas of the county. Halesworth LPC therefore includes a dedicated Leiston SNT, although effective local policing also relies on area based and county-wide policing resources.

2.3.14 The Leiston SNT community team provides cover between the hours of 8am and 22.00pm Monday to Sunday. Key responsibilities are to investigate local “volume crime”, work with partner organisations, engage with communities, solve ongoing community problems and reduce crime and anti-social behaviour. The size of this SNT is commensurate to the current ‘demand’ that needs to be policed.

2.3.15 Appendix H confirms the council wards and lower-level super output areas (‘LLSOAs’) which lie within the Halesworth LPC and Leiston SNT areas respectively. It should be noted these relevant wards and LLSOAs extend beyond the local study area applied within Chapter 9 – Socio-economics of the ES (APP- 195) where the Applicant’s formal assessment of likely significant effects on policing is set out.

2.4 Local Policing Deployment

2.4.1 Reflecting the geographic size of the county and available resourcing levels, the Constabulary operates both ‘single and double crewing’ for its Response Policing (‘NRT’) units. The safety of officers is a priority for the force and safe operating practices are essential.

2.4.2 Between 2300–0700 hours officers are double crewed wherever possible. Where single crewed units are necessary, their default patrol areas and deployment to calls are strictly risk assessed by the Constabulary’s Contact and Control Room (‘CCR’) officers based on a single crewed status. After 0500 hours single crewing is permitting to allow officers to remain patrolling whilst their crew partner completes any necessary paperwork. However, CCR policies dictate where single officers are not deployed to certain types of incident (e.g. domestic abuse incidents).

2.4.3 The Constabulary operates on an assumed 30% abstraction rate from its full available resources. This allows for leave, sickness, training, court, and other operational abstractions.

2.5 Roads Policing

Overview

2.5.1 Suffolk and Norfolk Constabularies operate a joint Roads Policing team (‘RAPT’), currently comprising 141 RAPT officers. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort abnormal indivisible loads (‘AILs’).

AIL Escort Role and Capability

2.5.2 Escorting vehicles carrying AILs along Suffolk’s road network is resource intensive for the Constabulary. The RAPT is a joint team shared between

Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled can impact the remaining operational number of RAPT officers available to be rostered for normal duties⁵.

- 2.5.3 The movement of AILs including obtaining permission for the required route is a complex and time intensive operation. Hauliers are required to provide advance notice of the movements of an AIL in accordance with the Department for Transport regulations. For many loads this is set at a minimum of two clear days to the Constabulary and the affected Local Highway Authorities and bridge authorities. For Special Order movements⁶, including mobile cranes over 80 tonnes GVW, two clear days' notice are required to the affected police and five clear days' notice to highway and bridge authorities. Longer notice could be necessary where temporary traffic management measures are required which are generally managed under Temporary Traffic Regulation Orders ('TTROs'). The management of AILs is always at the discretion of the Chief Constable for the affected local Constabulary.

⁵ Police Regulations state that changes to shift patterns require 30 days' notice and that police officers should have at least 11 hours rest between shifts.

⁶ Driver & Vehicle Standards Agency - Special types enforcement guide – Updated 27 September 2018

3 Pertinent Differences between Suffolk and Avon and Somerset

3.1 Overview

- 3.1.1 The Constabulary is concerned regarding the over reliance by the Applicant upon the perceived experience of the construction of the HPC project within the Avon and Somerset Police area to seek to predict community safety and policing impacts from the SZC project in Suffolk. Whilst the Constabulary acknowledge the importance of 'learning lessons' from HPC and have indeed spent considerable time engaging with the Avon and Somerset Police to understand potential impacts, this approach is not appropriate as baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different.
- 3.1.2 The section highlights key operational differences between the Constabulary and Avon and Somerset Police to illustrate that, irrespective of the predicted level of community safety impacts, it is not appropriate to replicate the same policing mitigation approach between the HPC and SZC projects as the Applicant has proposed. Details regarding the Constabulary's proposed approach to the delivery of adequate and appropriate mitigation are discussed in Section 9.
- 3.1.3 Evidence presented in this section demonstrates that the baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different, with Leiston and Hinkley also having significantly different baseline policing capacities. This reflects differences in the two forces operational policing models which have evolved to address differential needs of the local communities within their respective counties. In consequence it is not appropriate to replicate incident modelling or police resourcing mitigation solutions between the projects as the Applicant has proposed; a bespoke solution is instead required to address the net additional policing impacts of the SZC project within Suffolk.

3.2 Demographic and Socio-economic Differences

- 3.2.1 Suffolk's demographic profile differs from other areas including that of Avon and Somerset, meaning that impacts resulting from demographic changes due to SZC are not likely to be the same as experienced in relation to HPC. A comparative mapping exercise has been undertaken which highlights relevant geographical, demographic and socio-economic differences, provided in Appendix B.

Population Density

- 3.2.2 Avon and Somerset have a population of over 1.6 million and covers 1,855sq miles. Within that area are three cities, Bristol (pop. 467,099), Bath (pop. 88,589) and Wells (pop. 12,000) and 30 towns including the county town of Taunton (pop. 65,000+) and Bridgewater (41,000+).

- 3.2.3 Suffolk is more rural than Avon and Somerset with a population of around 760,000 over 1,585sq miles. There are six main population centres in Suffolk: the county town Ipswich (pop. 137,000), Lowestoft (pop. 75,000) and Bury St Edmunds (pop. 41,000), Felixstowe (pop. 25,000), Stowmarket (pop. 20,000) and Newmarket (pop. 16,600).
- 3.2.4 The proposed location of SZC is in a low population density area of Suffolk. Leiston is the nearest town to SZC. In 2019 it was estimated that the population was 5,751. The nearest larger towns with access to amenities are Ipswich (25 miles) and Lowestoft (24 miles).
- 3.2.5 While HPC is located on the coast in a rural part of Somerset the nearest population centre with good access to amenities is Bridgewater (pop. 41,000+) which is 11 miles from the site.

Age Groups

- 3.2.6 The population served by the Constabulary is different from that served by Avon and Somerset Police. As shown in Figure 3.1 below, the working age population in Avon and Somerset in proportional terms (64.5%) is considerably larger than in Suffolk (59.8%).

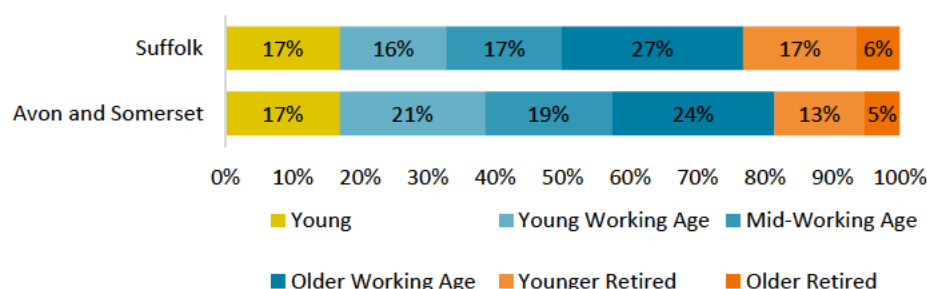


Figure 3.1: Age Structure Comparison with Avon and Somerset, 2018

- 3.2.7 Deprivation The nearest town to SZC is Leiston which sits within the East Suffolk District Authority. In 2019 Leiston and the surround area was ranked 15,788 out of 32,844 LSOAs in England: where 1 is the most deprived LSOA. This is amongst the 50% most deprived neighbourhoods in the country.
- 3.2.8 Using the Index Multiple Deprivation ('IMD') rank of average summary measure East Suffolk Authority District ranked 158 out of 317 local authorities and has some of the most deprived areas in Suffolk. Bridgewater is the nearest town to HPC. It is situated within the Sedgemoor Local Authority District. Using the IMD rank of average summary measure Sedgemoor Local Authority District ranked 121 out of 317 local authorities.
- 3.2.9 Compared to the 2015 IMD data deprivation has increased in both the East Suffolk and Sedgemoor District Authorities. However, the severity of IMD has increased more in Sedgemoor than in East Suffolk.
- 3.2.10 East Suffolk has some of the least deprived Lower-level Super Output Areas ('LSOA') in the country using the Crime MDI filter. The area around Leiston shows a generally low crime deprivation rate although Saxmundham is an

exception. In comparison, the Sedgemoor shows greater levels and concentrations of crime related deprivation. Bridgewater, Burnham on Sea and Woolavington are amongst the most deprived LSOAs in England.

Summary

- 3.2.11 The different demographic makeup of the two force areas is likely correlated to the different crime trends observed in each area. In addition to differential crime rates, Table 3.1 below shows that a higher proportion of recorded crimes in Avon and Somerset in the year ending September 2020 were theft offences (+5%) and public order offenses (+5%).

Table 3.1: Police recorded crime by offence group, year ending September 2020

	Suffolk	Avon and Somerset
Violence against the person	41%	35%
Sexual offences	4%	3%
Robbery	1%	1%
Theft offences	25%	30%
Criminal damage and arson	11%	11%
Drug offences	4%	3%
Possession of weapons offences	1%	1%
Public order offences	10%	15%
Miscellaneous crimes	2%	2%

Source: ONS (2021) Crime in England and Wales: Police Force Area data tables

- 3.2.12 This suggests that like-for-like comparisons of macro-level trends in policing cannot be accurately made between the two areas without controlling for demographic and socio-economic factors. The direct comparisons of policing requirements for Avon and HPC and SZC are therefore inappropriate and misleading.

3.3 Operational Policing Differences

Resourcing Capacity

- 3.3.1 At force level, differences between Avon and Somerset Police and the Constabulary are evident in the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services ('HMICFRS') categorisation of Most Similar Groups ('MSGs'), which places Avon and Somerset and Suffolk in significantly different groups. Importantly this relates to factors including geographical situation, resourcing, capacity, and workload, meaning the ability of Avon and Somerset Police and the Constabulary to help address community safety impacts from HPC and SZC, the need for associated mitigation and the most appropriate mechanism to deliver this mechanism are not directly comparable.
- 3.3.2 The HPC main development site is located within the Sedgemoor District policing area of Avon and Somerset Police. A comparison of existing local policing resources within the Constabulary's Halesworth LPC and Avon and Somerset Police's Sedgemoor District area is provided in Table 3.2 below.

Table 3.2: Local policing resource comparison

	Available Local Police Assets - Hinkley (Sedgemoor District)	Available Police Assets – Sizewell (Halesworth Locality)
Response Officers	5 teams of 16 (1 Sgt plus 15 Pc's) operated from Bridgwater.	5 teams of 6 (1 Sgt plus 5 Pc's) operated from Halesworth.
Community Officers	Bridgwater: 1 x Sergeant, 5 x PCs, 12 x PCSOs Wider Sedgemoor area: 7 x Pc's, 9 x PCSOs	Halesworth: 2 x Sergeants 7 x Pc's, 3 x PCSO's and a civilian investigator.
Funded Posts	HPC Team (1 x Sgt, 2 x Pc's, 1x PCSOs)	N/a
Total	6 x Sgts, 72 x Pc's, 12 x PCSOs. (excluding HPC team)	7 Sgts, 36 Pc's and 3 x PCSOs plus a civilian investigator.
Land Area	Sedgemoor 564.4 Sq km.	Halesworth Locality 991.9 Sq Km.
Population	122,791.	71,660

- 3.3.3 The above illustrates significant differences in the baseline operational capabilities of the Constabulary and Avon and Somerset Police between Hinkley and Leiston (before any uplift in mitigation for HPC or SZC has been applied) due to differences in community policing requirements. The two forces start from very different local resourcing positions. This conditions the scale, type and delivery of policing mitigation required in relation to HPC and SZC respectively. Without adequate mitigation being provided the Constabulary would have insufficient capacity at local and force-wide levels to address the likely community safety impacts from the SZC project. The Constabulary is not in a position to re-deploy resources from elsewhere in the county in order to mitigate against the additional demand arising from SZC.

Local Geography

- 3.3.4 HPC is located relatively close to Bridgwater, which serves as the home base for many county policing services. In contrast, the SZC main development site is remote from similar services in Suffolk.
- 3.3.5 The nearest Police Centre to the HPC main development site is located in Bridgwater, which is the largest police station in the Avon and Somerset Police area and acts as the home base for all Community Policing Units serving the Hinkley area. Bridgewater Police Centre houses several disciplines including uniformed, non-uniform and various specialist teams. This means all relevant policing units are available locally to manage issues arising from HPC (including the NHB workforce predominantly located in Bridgewater) and that additional Response Policing demands can be met from existing resources.
- 3.3.6 Local policing for the Halesworth LPC operates out of Halesworth Police Station, whilst specialist teams and non-uniformed officers operate out of Lowestoft (26.1 miles from Sizewell) or Police Headquarters at Martlesham (22.6 miles from Sizewell). Reflecting the rural and demographic characteristics

of the small settlement and surrounding hinterlands, there is no dedicated local policing base in Leiston and the policing approach is very reliant on local policing teams (i.e. SNT and NRT) rather than specialist resources. The Constabulary therefore does not have the same baseline capacity as Avon and Somerset Police to manage likely community safety impacts of the scale and nature likely to arise from the SZC project.

Table 3.3: Local policing accessibility comparison

Team	Homebase and Distance to HPC	Homebase and Distance to SZC
Uniform Community Policing	Bridgwater 12.4 miles/25 mins	Halesworth 15.3 miles/29 mins
Uniform Response	Bridgwater 12.4 miles/25 mins	Halesworth 15.3 miles/29 mins
Criminal Investigation Dept (CID)	Bridgwater 12.4 miles/25 mins	Lowestoft 26.1 miles/49 mins
Safeguarding Unit (SIU)	Bridgwater 12.4 miles/25 mins	Lowestoft 26.1 miles/49 mins
Roads Policing Unit	Bridgwater 12.4 miles/25 mins	PHQ 22.6 miles/39 mins
Armed Response	Bridgwater 12.4 miles/25 mins	PHQ 22.6 miles/39 mins
Crime Scene Investigators	Bridgwater 12.4 miles/25 mins	Lowestoft 26.1 miles/49 mins (CSI support for Sizewell may be from further afield due to the rota in place for cover).
Dog units	Bridgwater 12.4 miles/25 mins	PHQ 22.6 miles/39 mins (The duty Dog unit cover could be further due to where the on-duty unit is (This could be Norfolk).
Custody	Bridgwater 12.4 miles/25 mins	PHQ 22.6 miles/39 mins
Mental Health S126 Suite	Taunton Ward 16 miles/35 mins Yeovil Ward 38 miles/1 hour 7 mins	Woodlands Hospital, Ipswich 25.9 miles/ 48 mins Northgate Ward, Gt Yarmouth 36.7 miles/1 hour 9 mins

3.3.7 With Roads and Armed Policing Team ('RAPT') Dog units, Crime Scene Investigators ('CSI') and non-uniform officers all based some distance from Leiston, local officers experience delays in specialist support arriving in the area. The temporary construction workforce will place significant additional pressure on the existing local uniformed officers. This is very different to the situation at Bridgwater where both uniform, non-uniform and specialist units have always operated within the area that covers HPC.

Transport Accessibility

- 3.3.8 Differences in the proximity of the HPC and SZC sites to the strategic road network means additional demand on roads can be more easily met through Avon and Somerset Police's Roads Policing Units. Access to the SZC main construction compound, having left the dual carriageway of the A12, is through single carriageway, country roads which are not regularly patrolled by such units
- 3.3.9 Avon and Somerset Police's Roads Policing Units are strategically based at Bridgwater to provide a roads policing capability along the M5 route connecting Taunton, Bridgwater, and Weston Super-Mare. In contrast, the East Suffolk Command Area does not have any strategic roads, the closest being the A14 at Nacton, some 25.2 miles from the SZC site.
- 3.3.10 Whilst the A12 is the main route that allows policing units to travel between Halesworth, Lowestoft and Martlesham, significant lengths are single carriageway and it is not a strategic (Trunk) route (as defined by Highways England) so the Constabulary's Roads Policing Firearms Operations Unit (RPFOU) do not routinely patrol the route. Any disruption to the A12 impacts heavily not only on local policing units but also those specialist teams required to travel to incidents from further afield. If the A12 is closed and traffic is diverted, Suffolk's rural road network is a very difficult route to navigate and significantly increases travel times. The Constabulary's policing model and its resourcing factors in travel times to emergency response calls. Changes to road metros that themselves change response times further supports the need for a more localised mitigation of additional demand.

Urban and Rural Amenities

- 3.3.11 The Glasson Report (2019) found that NHB workers were primarily staying either in the two campus accommodation sites or within close proximity to Bridgwater and surrounding urban areas. Bridgwater provides a range of amenities and can offer accommodation to those who do not choose to live within the HPC campus for NHB workers. This is not the case in Leiston which has limited housing stock and therefore less ability to absorb the NHB SZC workers. For those that choose not to reside in the SZC campus, accommodation will have to be sought outside of Leiston meaning the SZC NHB workforce will be more diffuse and associated community safety impacts are likely to be distributed over a wider rural area.

4 Community Safety Impacts from the Sizewell C Project

4.1 Overview of SZC Project

- 4.1.1 The main development site for SZC is located on the Suffolk coast, immediately to the north-east of Leiston and approximately halfway between Felixstowe and Lowestoft, within the administrative boundary of East Suffolk Council ('ESC').
- 4.1.2 Construction requirements for the SZC project have been derived by the Applicant with reference to labour demands experienced to date on the HPC project, also delivered by the Applicant. This suggests a 12-year construction profile for the SZC project, with a peak labour demand of 7,900 workers in Year 7 of the build. The Applicant estimates that, on average, close to one-third of the construction workforce (33.2%) will be home-based workers – residing within a 60-minute drive-time of the SZC Site. This suggests, at peak, an additional 5,884 NHB workers will reside in Suffolk, with these workers expected to be distributed between the Applicant managed temporary accommodation and off-site private housing.

4.2 Likely Community Safety Impacts

- 4.2.1 The Constabulary considers that as a major infrastructure project involving a long construction period and large NHB construction workforce, the nature and scale of the SZC project is likely to give rise to the following types of community safety impacts which will require policing involvement to mitigate. The primary receptor in relation to community safety is the impacted population itself, which comprises that of the local area (Leiston) and Suffolk more widely (i.e., residents, workers, visitors, users of the transport network, etc) as well as the projected SZC workforce (construction and operational).

Substantial Demographic Changes

- 4.2.2 From information provided in the SZC DCO application it is clear the construction of SZC will require a very large workforce, including a significant NHB component, over a prolonged period (12 year estimated construction programme). The Applicant contends that much of this workforce will be drawn from the workforce engaged in the construction of SZC in Somerset whilst simultaneously highlighting local economic and employment benefits for people in Suffolk.
- 4.2.3 To understand the community safety risks and impacts from the SZC construction workforce, it is first necessary to understand the baseline demographic position. In short, the existing population of Suffolk displays a predominantly rural character with a high rate of population ageing, resulting in a specific demographic profile (as opposed to simply a population size) that is associated with relatively low crime and wider community safety risks. Any substantial change to this demographic profile is therefore likely to increase the risk profile and generate adverse impacts. It also should be noted that Suffolk's demographic profile differs from other areas including that of Somerset,

meaning that impacts resulting from demographic changes due to SZC are not going to be the same as experienced in relation to HPC.

4.2.4 Irrespective of where the workforce is drawn from, the introduction of a large NHB workforce population, including family members, will result in a substantially increased population and substantially altered profile compared with the baseline situation within Leiston and the surrounding area. Taking account of the baseline demographic profile, these substantial demographic shifts are likely to generate a wide range of adverse community safety impacts on both the SZC workforce (including families) and existing communities through adverse changes in safety, crime and welfare related incidents, many of which will require input from the Constabulary to manage. This is likely to include adverse impacts on existing vulnerable groups (including young people and persons at risk of exploitation), mental health incidents including those requiring police assistance, reduced community cohesion in deprived communities, a rise in anti-social behaviour (particularly where the workforce is concentrated), impacts associated with growth of the night-time economy (e.g. from licensed premises and drug related crime), and increases in a range of crime-types being committed and detected.

4.2.5 Notwithstanding weaknesses within the submitted Community Safety Management Plan ('CSMP') (APP-635) which are discussed in Part 3 of the WR, the document usefully lists the following risks to community safety (paragraph 1.1.6):

- *Impact of the increase in population on demand for services.*
- *Impact of this population on crime (both by and against the workforce) and policing.*
- *Impacts on the night-time economy and on licensed premises, and potentially on drug related crime.*
- *Impacts on specific locations where concentrations of NHB workers take temporary accommodation in the area, including anti-social behaviour and nuisance.*
- *Impacts of the proposed main development site accommodation campus and caravan park on land east of Eastlands Industrial Estate in Leiston.*
- *Impacts associated with workers' use of temporary accommodation.*
- *Accidents on-site and safety aspects for the public, SZC staff and emergency service responders and in associated developments and activities relating to SZC including workforce travel and transport of materials.*
- *Impact of increased traffic volumes during on ability to address*

- *Traffic volumes and effects on road capacity and specific events such as delivery of road-borne AILs which may have the potential to affect emergency service response times to the immediate locality and surrounding communities.*
- *Impacts on equality target groups and community cohesion, including on vulnerable groups.*

4.2.6 In addition, the following relevant concerns are listed in paragraph 9.7.192 of Chapter 9 - Socio-economics of the ES (APP-195):

- *Potential risks to vulnerable young people and care leavers, particularly in Leiston, and particularly those who are in housing need or vulnerable to homelessness;*
- *Potential risks related to cultural differences between NHB construction workers and residents.*
- *Potential risks related to drugs, alcohol and prostitution including exploitation of young girls by a predominantly male workforce, and potential for related increase in trafficking and other hidden harm.*
- *Potential risk of increase in mental health issues from SZC workforce, and correlate in increased demand on Policing.*

4.2.7 The Constabulary considers that these community safety impacts are all likely to arise from the construction of SZC and will therefore need to be adequately mitigated (wherever possible avoided), including through substantial involvement by the Constabulary in additional prevention, deterrence, safeguarding, incident response and investigation work alongside involvement from partner agencies.

Substantial Traffic Changes

4.2.8 From information provided in the SZC DCO application it is clear the construction of SZC will generate a substantial increase in volumes of AILs requiring police escort and an increase in other HGVs, construction traffic and workforce vehicles, together with proposed road infrastructure developments. This is likely to result in changes in use of the transport network and road safety (increased collisions and delays) and an increase in traffic offences.

HGV Traffic

4.2.9 In responding to the impacts on roads policing due to the proposed construction and operation of the SZC project and associated off-site infrastructure, the prime focus of the Constabulary's response is around the management of the movement of AILs associated with the construction phase of SZC. However, the Constabulary is also concerned that the predicted substantial volume of HGV movements combined with activity on the road network from the

introduction of the SZC workforce is also likely to generate an uplift in other road traffic incidents and offences.

AIL Movements and Traffic Delays

4.2.10 The movement of AILs through the road network can cause additional delays to other traffic and journey time reliability. Delays are sensitive to:

- The speed of the AIL;
- The number of lanes occupied by the AIL and available for other vehicles to pass;
- The volume of ambient traffic, which depends on the day and time of travel; and
- How far AILs travels before there is an opportunity for queued traffic to pass.

4.2.11 Most of the impact comes from larger and slower AILs which are not able or permitted to travel at the speed of other traffic. Congestion costs and delay caused by an AIL increase rapidly as its speed is reduced and as it occupies more road space. The speed of a load can have as critical an impact as lane-take on delay to other traffic. Conversely, speed increase of an AIL could reduce congestion costs considerably but bring poor safety implications. Congestion is known to cause driver frustration, which could result in aggressive driving behaviour, increased stress levels and a tendency to take inappropriate risk or illegal action.

4.2.12 Without sufficient additional policing resources, an increase in demand for AIL management and the policing of road traffic offences would place an unsustainable and unacceptable burden on the Constabulary's roads and wider policing teams which would reduce their operational effectiveness. The excessive draw on resources could also hinder the safe and efficient construction of SZC as insufficient capacity would be available to facilitate substantial additional AIL movements in a timely manner.

Substantial Changes in Health and Safety Risks and Occurrence of Protests / Disturbances

4.2.13 Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) provides an assessment of potential significant effects arising from the 'vulnerability' of SZC to 'major accidents and disasters' ('MA&D') and the potential of SZC to result in new sources of major accidents. As with impacts resulting from demographic change, the primary receptor impacted by the range of MA&D risks associated with SZC (including protest risks) is the population of local area (Leiston), the SZC workforce and the population of Suffolk more widely, whilst the Constabulary has a critical role in responding, management and mitigation. This role extends to pro-active emergency preparedness and associated training alongside incident co-ordination, response and investigation.

- 4.2.14 SZC is likely to attract heightened protestor activity to Suffolk, due to the contentious nature of nuclear energy, as exhibited through other major infrastructure development projects. Where such protests fall within areas that are policed by the Constabulary, to ensure the most expedient response and so resolution to these protests, there is a need to ensure that those officers that addresses protestor removal are equipped and trained to deal safely with the eventualities that such protests can attract and the methods and means of addressing the tactics such protesting is known to use.
- 4.2.15 The current number of officers trained for protestor removal in Suffolk is based around catering for likely current demand within Suffolk, and they are trained to F5 Module 'Basic Protestor Removal' level as set by the College of Policing. The number of officers trained will need to be increased to address the likely increase in protest removal requirements from SZC activity. In addition to the current F5 Module training requirement there will be a need to train Suffolk officers to the College of Policing F7 Module that allows for the removal of protests held at height and the purchase of specialist equipment required for protester removal at height.
- 4.2.16 If the Constabulary's ability to efficiently facilitate and manage protests connected with SZC is not adequately resourced there would be a need to call upon neighbouring forces, which is likely to result in significant delays in the lawful resolution of protests and increased disruption.

Additional Community Safety Risks

- 4.2.17 Following discussions between the Constabulary and the Applicant, the SZC PIA has focused on quantifying demand arising from likely community safety impacts attributable to the projected SZC NHB workforce population (including families) on a per capita basis and owing to the need for significant AIL movements. However, additional resource implications also need to be considered in the context of wider community safety and policing impacts not directly attributable to individual construction workers or AIL movements. This is required as:
- The predicted increase in crime and wider community safety incidents requiring police involvement is not solely predicated on SZC workers being direct perpetrators or victims of crime. Rather, it is well established that areas of concentrated population including major constructions sites often become a 'honey pot' that attracts criminals to the area as a result of increased market demand and 'rich pickings'. A concentration of workers on a higher than average wage for the area, and the associated trappings these workers will bring i.e. disposable income for the night time economy and other recreational activities (both legal and illegal) will attract market suppliers.
 - Predicted demand for local policing based on current known per-capita based levels of demand cannot quantitatively forecast other areas of crime and wider policing demand growth which are likely to arise from a

construction project of this scale and in the proposed location. Taking account of the expected demographic profile of the SZC construction workforce, wider areas of local policing demand are highly likely to include:

- Serious crime areas such prostitution, human trafficking and modern-day slavery, as well as an increase in night time economy offences, violence against the person, domestic violence and sexual offences. These offences are among the most intensive in terms of police resourcing and harm caused to victims.
- County Lines – criminal groups who deal drugs look to exploit new drugs markets to expand their business, for which the SZC NHB workforce would be a prime market. Areas of Leiston are deemed as deprived and already home to a proportionately higher number of drug users, so a disproportionate proportion of the S23 warrants executed within the Halesworth locality are in Leiston. To ensure drugs lines are not established, pro-active policing will need to take place to deter any wider criminal activity. The introduction of a very large transient workforce will be very attractive for organised criminals to target. If drug lines are established, other related crimes will occur including violence (including possibly weapons), public order, burglary, robbery, theft, child sexual exploitation and MDS.
- Responding to EDF Site Security – local policing units will be required when security become aware of suspicious activity around the site, such as individuals taking pictures or filming. In such situations the Constabulary resources will be required to engage and investigate the activity. Local units will also be asked to attend the site when security checks identify items that are illegal or prohibited, or incidents identified by security where warranted powers are required.
- Licensing – bars, restaurants and clubs will need a proportionate policing response. Officers will need to undertake license checks to ensure compliance with conditions and any incident within a licensed premise will need to be reviewed by the Constabulary.
- Visible patrols – any increase in crime, or perceived increase in risk, results in heightened community concerns and tensions. The most effective way to reassure the community is to provide visible policing patrols into those areas where concern has escalated, which requires resources to be diverted from other commitments. Whilst data presented above helps to represent the time and resources needed to deal with particular types of crime, it cannot accurately reflect the additional time and resources needed to undertake additional patrols and to be visible, supportive and engaging with the public in the aftermath of incidents.

Without this follow up support, communities will be left to feel vulnerable and excluded.

- Protests – spontaneous and prolonged protests will be assessed at the time and resources allocated to it. This may be local officers or specialist officers, either way they would be abstracted from the shift strength at that given time. In the absence of additional resourcing, this would create weakness in the overall workforce strength to manage the protest and maintain the current standard of police service.
- Crime prevention work – local SNT resources promote crime prevention, this will be both on and off site. The effective delivery of crime prevention messages can significantly influence the level of activity that requires further police resources by stopping incidents and crimes occurring.
- Suspicious incidents – where local residents become concerned about “activity” that is suspicious, the police will be called. This could mean potential drugs dealing, cars parked outside houses, groups gathering, the behaviour of individuals and other behaviour that concerns people. What is reported will drive the level of police response required.
- Safeguarding Investigation Unit (SIU) – where concerns are raised regarding the safety or wellbeing of a minor (aged under 18) the Safeguarding Investigations Unit will conduct a visit, sometimes jointly with Social Services. SIU investigations vary in length and can be very resource intensive, often taking months of police involvement and work. With the arrival of family members and children, it is expected that this will create additional demand on SIU resources.
- Hate crime prevention work – as the SZC construction workforce is like to be diverse, the Leiston SNT will need to engage with the Applicant and orders around hate crime. It is expected that a large number of these engagements will be on site.
- Parking and congestion – Notwithstanding proposed parking related mitigation measures, there is a real concern around the potential for fly parking in Leiston and the immediate surrounding area. The Applicant has continued to experience such problems at HPC, which has had an impact on their workforce and caused tensions within the local community. Many of the residential roads within Leiston (and other areas) are already at a saturation point and any increase in parked vehicles will cause obstructions. The main entrance to the SZC main development site is due to be located on the B1122 which is a single lane, two-way road. It is one of the main routes into Leiston which, if congested due to illegal parking would impact on local and SZC traffic.

In this eventuality, the Constabulary's resources would be required to deal with reported incidents. Whilst the local authority will manage parking in general, any case related to obstruction will be an issue for the local SNT, result in the Constabulary's time and resources required to manage this. As many of the offending vehicle's will be registered to workers "home addresses" as opposed to their temporary work accommodation, this is likely to hinder the Constabulary when identifying who is responsible and establishing contact with the owner in parking related issues.

- 4.2.18 Robust monitoring and adequate contingency arrangements need to be in place through the Public Services Resilience Fund (i.e. the Section 106 Agreement) to allow the Constabulary to address these additional community safety risks should they materialise. For the avoidance of doubt, the required contingency funding for potential additional risks is additional to the 'base level' of additional resourcing needed to address *likely* local policing impacts from the SZC NHB workforce and roads policing impacts from the movement of substantial volumes of AILs on Suffolk's roads as discussed above.

Summary

- 4.2.19 Planning for and responding to the likely community safety impacts of SZC extends beyond simply dealing with an increase in recorded crimes as suggested within Chapter 9 (Socio-economics) of the ES (APP-195). Instead, for policing to appropriately help to mitigate community safety risks will require the Constabulary to invest in and deploy additional capacity and specialist resources, including in respect of local community and roads policing, with associated lead in times to ensure appropriate training.

5 Concerns Regarding the Applicant's Approach

5.1 Overview

- 5.1.1 This section outlines the Constabulary's main concerns with the approach adopted by the Applicant to date in the consideration of likely community safety and policing impacts from SZC.

5.2 Narrow Scope of Published Community Safety & Policing Impact Assessment

- 5.2.1 The Constabulary welcomes the inclusion of demographic effects and resulting impacts on community safety and emergency services within the scope of the Environmental Impact Assessment ('EIA'), together with the intention to assess net additional community and policing effects. However, based on the Constabulary's review of relevant documents including the Chapter 9 (Socio-economics) of the ES (APP-195) and associated Community Safety Management Plan (CSMP) (APP-635), the Constabulary is concerned that important points made by the Constabulary to the Applicant in pre-application consultation responses have not been fully addressed, and in consequence there are important gaps in the formal assessment of community safety impacts. This matters as agreement of net additional policing resourcing requirements should flow from the identification of likely community safety and associated policing demands on a robust basis.

- 5.2.2 Whilst a number of detailed comments regarding the adequacy of the assessment provided in Chapter 9 (Socio-economics) of the ES (APP-195) are provided in Part 3 of the WR, the focused on two main concerns:

- **Narrow scope of assessment** - the singular focus of the small policing impact assessment (Paragraphs 9.7.216 – 9.7.23 of Chapter 9 (Socio-economics) of the ES (APP-195) on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than considering wider community safety impacts which are likely to require police involvement and thus place resourcing demands upon the Constabulary.
- **Limited consideration of demographic factors** – the quantitative assessment of population dynamics undertaken in Chapter 9 (Socio-economics) of the ES (APP-195) does not appear to have been factored into the assessment of resulting community safety impacts (i.e. resulting from higher risk demographic profile and concentration of the NHB construction workforce in a rural community).

- 5.2.3 Following dialogue with the Constabulary, the Applicant included additional baseline data regarding the Constabulary's workload within Section 2.4 – Socio-economics of the submitted ES Addendum (AS-181). However, the actual impact assessment of likely effects on crime and policing and the approach to mitigation remains unchanged. The Constabulary advised the

Applicant in November 2020 that whilst the inclusion of additional baseline data would be welcome in terms of helping to contextualise the assessment, in isolation this alone would not rectify identified deficiencies within the published impact assessment.

- 5.2.4 Acting in their role as a Statutory Party, Part 3 of the WR provides a collated set of detailed comments relevant application documents submitted by the Applicant regarding the assessment, mitigation and acceptability of likely community safety impacts. These comments provide further analysis to evidence the assessment deficiencies identified above.

5.3 Why Reliance on HPC SEAG Data Is Inappropriate

- 5.3.1 In recent correspondence and meetings held between the Applicant and the Constabulary to inform the preparation of this PIA (to address the assessment gap identified above), the Applicant has suggested that any modelling of policing impacts from SZC should be based on policing data collated by the HPC Socio-economic Advisory Group ('SEAG') in order to account for their workforce characteristics. This position is not accepted by the Constabulary owing to known weaknesses with the HPC SEAG data (including under-reporting). Also, the introduction of a workforce population in one demographic, socio-economic and geographical situation cannot be predicted to generate the same community safety impacts in an entirely different situation, even if the same NHB workers were involved. The Constabulary is therefore concerned regarding an over reliance by the Applicant upon the perceived experience of the construction of HPC project within the Avon and Somerset Police) area to seek to predict community safety and policing impacts from the SZC project in Suffolk.
- 5.3.2 It should be noted that SEAG reports have evolved since 2017 and thus do not present comparable data over the HPC construction period, including regarding what data is included and how data is broken down. This has been confirmed by the HPC 'Beat Team' as a known issue which affects the ability to use the SEAG data to present a full picture of policing impacts arising from HPC. Policing data collated by the HPC SEAG is also known to suffer from other quality issues, including inconsistencies and inaccuracies in the recording of incidents. Further information on the poor data quality of SEAG data is presented in Appendix C.
- 5.3.3 The Applicant has identified three sources of policing (crime and non-crime) data reported by Avon and Somerset Police to the HPC Socio-economic SEAG. Issues associated with each of these which undermine the reliability of the SEAG data and mean that it is not appropriate to use as a modelling input for SZC are outlined in turn below.

Automatic Tagging

- 5.3.4 There is a clear risk of 'hidden demand' for policing being generated directly or indirectly by the HPC NHB workforce population (including families), including where the relevant individual may be witness or victim, but not then attributed as demand arising from HPC.

- 5.3.5 HPC SEAG returns are based on CADs⁷/investigations being flagged or tagged as relating to HPC (including indirectly via the NHB workforce and associated families). It is well reported within policing and academic quarters that this process is known to be inconsistent as crimes and incidents can be missed from being tagged or wrongly categorised. Numerous studies have shown there are weaknesses associated with police use of tagging/flagging with regards to mental health, digital/online crime and hate crime – all of which involve mandatory tagging by the Home Office. One known issue with tagging/flagging is officers forgetting to include a specific tag/flag during the height of an investigation.
- 5.3.6 Another concern is that unlike a specific event or crime case (often geographically specific and time limited) where related incidents or reports can relatively be easily identified, incidents involving or affecting members of the SZC NHB workforce or their families may be otherwise completely unrelated to SZC and dispersed amongst reports of other incidents across the force area.
- 5.3.7 To work effectively, tagging/flagging requires caller/victim/person reporting to use a key word relating to HPC/EDF for it to be tagged as related to it. If the incident is not addressed by the HPC Beat Team (e.g., due to limited operating hours and staffing) and does not relate to a place of employment or a group of employees, it is unlikely an individual reporting would think to volunteer that information without prompting. Additionally, the terms of proposed SZC Code of Conduct mean the Applicant's workers may be less likely to volunteer to the Constabulary their connection with HPC if they have committed an offence or fear their behaviour being reported back to their employers.

Security Response Occurrence Forms

- 5.3.8 Security Response Occurrence Forms ('SORFs') are generated by HPC's on-site security team, led by a former police officer, rather than coming directly from the Constabulary. The response from the Applicant dated 29th April 2021 states that SORFs are shared with the Avon and Somerset Police/HPC policing team to add to the SEAG statistics where these relate to a crime.
- 5.3.9 Whilst the use of SORFs would be supported as promoting regular dialogue between the on-site security team and the Constabulary, they are an inappropriate mechanism for statistical reporting and interpretations between HPC and SZC due to clear potential for inconsistencies.
- 5.3.10 SORFs are produced by HPC's on-site security team and only those deemed relevant are passed to Avon and Somerset Police, including where further investigation may be required. However, it cannot be guaranteed that a civilian on-site security team will adopt the same position as a Constabulary (whether Avon and Somerset Police or Suffolk) regarding the relevance of every incident or any potential need for subsequent police resourcing.
- 5.3.11 The significant local experience of HPC's on-site security team combined with the working relationship between the Applicant and Avon and Somerset Police

⁷ Computer Aided Dispatch

may result in some low-level incidents being dealt with proportionately and informally by HPC's on-site security team (e.g., targeted patrols) and or associated processes (e.g., disciplinary procedures) without involving Constabulary resources.

Incidents dealt with by HPC Beat Team

5.3.12 Of the crime types that are categorised within the SEAG data, it is recognised by colleagues in Avon and Somerset Police that a large proportion of these could not be dealt with by the funded resources within the Beat Team, and therefore are having to be resourced through officers outside of that funded by the Applicant. One example, of both the fragility of tagging and need for resources outside of the funded Beat Team, dealing specifically with the HPC development and the policing activity that emanates from the development and the workforce is a recent operation to address careless and dangerous driving on the C128 (main route to HPC). This is summarised in Appendix C and D.

Summary

5.3.13 The Constabulary believes it is inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group ('SEAG') as the basis for assessing likely community safety and policing impacts from the SZC project. It is acknowledged that HPC SEAG data provides useful contextual information, but any assessment of likely policing impacts from SZC and the development of associated mitigation measures must be based on observed and modelled data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project.

5.3.14 This has always been and remains the Constabulary's position. Due to significant demographic, socio-economic, policing, and geographic differences between Suffolk and Avon and Somerset, any approach used by Avon and Somerset Police and the Applicant to predict and/or seek to mitigate the community safety impacts of HPC cannot be simply transferred and used for SZC. For the reasons set out above, the Constabulary firmly maintains that any assessment of likely policing impacts from SZC and the development of associated mitigation measures must be based on observed and modelled data directly applicable to the geographical, socio-economic, policing, and demographic contexts of the SZC project.

5.4 Limitations of HPC Beat Team Model

5.4.1 The Applicant has promoted to the Constabulary the policing model adopted at HPC involving the use of an EDF funded 'Beat Team' based on site. In response, the Constabulary has consistently made clear that whilst the provision of additional Local Policing officers forms an important element of community safety mitigation for SZC, to be effective these officers need to be based in the community (i.e. Leiston) and integrated with the constabulary's existing resources. Additionally, some of the net additional policing demand generated by the SZC project will need to be addressed by specialist resources outside of Local Policing teams.

5.4.2 The experience at HPC, which SZC are seeking to replicate, is that mitigation funding is only provided to Avon and Somerset Police in respect of a small team of local policing officers based on the HPC site ('the HPC Beat Team'). The Constabulary has a number of concerns with this approach and considers that it is not an appropriate model to adopt for the SZC project in Suffolk:

- Work dealt with by the HPC Beat Team is often activity that is handed to the Beat Team from other departments including CCR, Roads Policing, NRT and CID. Therefore, by default, work has already had to have been completed by officers outside of the EDF funded Beat Team. The level of work that has been completed by other resources before it is passed onto the funded Beat Team will vary depending on the specific incident; Appendix D provides examples of where additional resourcing to the Beat Team may be required for each SEAG crime classification. This suggests Avon and Somerset may have had to absorb significant net additional policing demand generated by HPC through existing resources.
- Without prejudice to operational decisions made by Avon and Somerset Police or to any mitigation agreements reached between EDF and Avon and Somerset Police in respect of HPC, it is clear Suffolk and Avon and Somerset Police have different operational models and resourcing capacities, such that the Constabulary is less able to absorb any net additional increase in policing demands without additional resources.
- Under the Police and Criminal Evidence Act ('PACE'), that there is a responsibility for the police to progress issues when a person is placed in custody in the most expeditious way (as an individual is having their liberty infringed upon). This means that the arresting officer, whichever team they are drawn from, will be fully engaged within the process to progress enquiries in the most expedient manner without delay. The period that the initial arresting officer is engaged in the process, will depend on the type and severity of the incident and so the number of enquiries that will need to be followed. The implications of PACE requirements are A) if the arresting officer is from the Beat Team they will be abstracted from their shift and any scheduled events i.e. site visits or talks to HPC staff, so the need for resilience within the Beat Team is paramount B) If the arresting officer is outside the Beat Team, the arresting officer cannot pass the workload onto the Beat Team until the arresting officer has progressed to the appropriate stage that allows for an appropriate handover. This again means that work is likely to have been absorbed by officers outside of the funded HPC Beat Team, even if the case is then handed over to the Beat Team.

5.4.3 The principle of what the Beat Team can and cannot address is also reflected through the hours they operate, and that activity outside of these hours will have to be picked up by resources other than the Beat Team. Due to the nature of

policing, grade A and B calls cannot be left until the Beat Team are available and will need to be dealt with immediately.

- 5.4.4 Additionally, when responding to a call of a significant nature there is the issue of needing to apply the “Golden Hour Rule”. The golden hour is the term used for the period immediately after an offence has been committed, when material is readily available in high volumes to the police.
- 5.4.5 Positive action in the period immediately after the report of a crime minimises the amount of material that could be lost to the investigation and maximises the chance of securing the material that will be admissible in court. To properly undertake this action, there will be a need to pool resources from those units on duty at the time, again exhibiting that a limited Beat Team cannot have the capacity to address the resource requirements.

5.5 Importance of Employment Status for Crime Modelling

- 5.5.1 The Applicant has suggested that the Constabulary’s police resourcing impact model should control for employment status. Unlike age and gender, employment status is not recorded by the Constabulary or any other police force in the country. Neither victims nor suspects are obliged to share this information with the police. Additionally, evidence from academic literature indicates that the relationship between employment status and crime is unclear.
- 5.5.2 There are four main problems commonly faced in trying to establish any relationship between unemployment and crime (or the absence of a relationship from an employed workforce):
- Crime is committed by both unemployed and employed people and that periods of historic employment levels have seen an increase in certain types of crime.
 - There is limited data available to link economic status to criminal investigations as the police routinely record this.
 - Studies usually focus on property crimes, rather than crime as a whole or other crime types. Successive studies (usually in America) have showed that there is a correlation between property crime and unemployment. However, correlation is not causation and most of the studies do not include multivariate modelling or control in their regression analysis.
 - Most significantly, there is an endogeneity issue with trying to establish a causal relationship between unemployment and crime as unemployment could be either the cause or the effect of crime: ie someone commits crime because they are unemployed or are unemployed because they commit(ed) crime and lost their job as a result. Endogeneity makes establishing causal factors difficult and almost always open to dispute and interpretation.

- 5.5.3 Meta-analysis of academic research shows there is currently no consensus in the academic community (both criminological and economics) as to the relationship between crime and unemployment, with considerable debate around causation, correlation, the role of contributing factors and methodological issues with trying to establish the relationship in the first place.⁸ A detailed literature review around this topic is presented in Appendix E.

5.6 Limited Impact of Embedded Mitigation

Worker Code of Conduct

- 5.6.1 It is acknowledged that the Applicant has placed great a deal of weight on the Worker Code of Conduct as a tool to mitigate the community safety impacts of the SZC workforce. Whilst the exact details of the Worker Code of Conduct has yet to be formally agreed, it is the power of the Worker Code of Conduct as a tool to influence worker behaviour that needs to be established.
- 5.6.2 The Worker Code of Conduct does not provide a legal gateway for the Constabulary to disclose information for non-policing purposes. The Constabulary has to rely on another policing power. When the Constabulary are responding to or investigating an incident any victim, witness or suspect does not have to provide any detail regarding their profession or their employer details. This then causes two issues:
- If an individual commits a criminal act and is dealt with by the Constabulary, the Constabulary would not be aware of the individual's link to SZC and the position they hold.
 - If the individual did volunteer the information to confirm they are employed on the construction site (or associated sites) the rules around any disclosure to their employer or regulatory body is very much limited. Common Law Police Disclosure '(CLPD)' has replaced the Notifiable Occupations Scheme ('NOS'). CLPD provides a way to pass on relevant and necessary information where there is a public protection risk so that the employer can act swiftly to mitigate any danger by putting in place safeguarding measures. Disclosure will be made when there is an urgent social pressing need and must be balanced with the individual's human rights and welfare needs. This can occur at the point of arrest, charge, voluntary attendance or receipt of information indicating an SCZ worker may present a risk to the public. Disclosure cannot occur unless there is an urgent and serious risk. This will mean the large proportion of situations will fall outside of these parameters.
- 5.6.3 In both of the above cases, the Constabulary will not be in a position to provide the Applicant (or the individuals employer) with the fact that they have been involved in any criminal activity.

⁸ Entorf, H. & Sieger, P. (2014) Does the Link between Unemployment and crime Depend on the Crime Level? A Quantile Regression Approach. Available at: <http://ftp.iza.org/dp8334.pdf>

- 5.6.4 The Applicant will be unable to apply to the Constabulary for any data related to their workers under the “Subject Access” route as the information is personal to the individual involved. It would be unlawful for the Applicant to request a worker submits a subject access request themselves. That is referred to as Enforced Subject Access and is a criminal offence under the Data Protection Act 2018.
- 5.6.5 Whilst the Worker Code of Conduct is welcomed, it does not provide a robust means to prevent any criminal act, disorderly behaviour or anti-social behaviour. It will not provide a platform for information to be shared to the Applicant. For these reasons, it is not appropriate to seek to quantify the impact of the Worker Code of Conduct in deterring crime incidents. There is insufficient monitoring and evaluation evidence to robustly suggest a percentage reduction in incidents, or any other quantifiable metric by which it could be reliably incorporated.

Security Vetting

- 5.6.6 The Constabulary understands that all staff working on the SZC project will undergo security vetting. However, the Applicant has not confirmed what level of vetting and what criteria will be applied. The acceptance thresholds for roles have also not been disclosed i.e. what type of previous criminal record would mean a would-be employee would not be recruited for the SZC project.
- 5.6.7 Whilst the vetting is welcomed, the Constabulary cannot view the Applicant’s vetting as a tool that will reduce policing impact. Through dialogue with colleagues in Avon and Somerset it is known that despite having undergone vetting, some EDF workers who have come into contact with the police are found to have criminal records that from a policing stance, would have made them likely candidates to recommit certain crimes or activities.

6 Suffolk Constabulary Police Resourcing Assessment Methodology

6.1 Overview

6.1.1 The Constabulary has a long-established practice of undertaking resource planning at the predicted peak requirement of planned events to ensure sufficient police resourcing is in place to address predicted peak community safety impacts. However, following discussions with the Applicant and detailed resource demand modelling the Constabulary developed a refined approach which utilises:

- Annual average NHB workforce figures provided by the Applicant to model likely policing demands and associated resourcing requirements arising from the NHB workforce population during the construction of the SZC project. This approach is underpinned by use of the NPCC standard officer cost rate.
- A proportionate risk-based approach to predict the volume of ALL movements likely to require police escort during the construction period, taking account of other proposed traffic mitigation measures.

6.2 Population Based Policing Demand – Input Data

Modelling based on Observed Characteristics in Suffolk and Predicted SZC Workforce

6.2.1 Community safety and policing impacts are predicted to occur during the construction phase of the SZC project due to factors including substantial demographic changes resulting from the predicted NHB construction workforce⁹. The demographic profile of this workforce is likely to be significantly different from the demographic profile of Leiston and Suffolk as a whole.

6.2.2 The existing population of Suffolk displays a predominantly older and more rural character with a high rate of population ageing, resulting in a specific demographic profile (as opposed to simply a population level/size) that is associated with relatively low crime and wider community safety risks. Any substantial change to this demographic profile is therefore likely to increase the risk profile and generate adverse impacts. It also should be noted that Suffolk's demographic profile differs from other areas including that of Avon and Somerset, meaning that impacts resulting from demographic changes due to SZC are not likely to be the same as experienced in relation to HPC.

6.2.3 To account for these factors, a series of age and gender 'weightings' have been derived from observed incident data. These have then been applied to the likely demographic makeup of the construction workforce to account for increased

⁹ Whilst the home-based (HB) workforce would also both generate and experience community safety impacts, policing of this component of the workforce is already largely accounted for through existing funding mechanisms.

probability of incidents perpetrated by, victimising or otherwise affecting the temporary NHB workforce population.

Construction Workforce Demographics

- 6.2.4 The Applicant has used 2011 Census data to approximate the likely demographic makeup of the construction workforce.¹⁰ There is currently no breakdown of this specific ratio regarding job or location (e.g., home-based, or non-home-based). As such it is assumed the gender split will be consistent throughout the construction period and applies to the whole workforce population. The age and gender breakdown used by the Applicant to model socio-economic effects of the workforce is presented in Table 6.1 below.

Table 6.1: Assumed age and gender breakdown of construction workforce

Age band	Male	Female
Age 16 to 19	2.4%	0.3%
Age 20 to 21	2.7%	0.3%
Age 22 to 24	5.1%	0.6%
Age 25 to 29	9.4%	1.2%
Age 30 to 34	9.1%	1.2%
Age 35 to 39	9.7%	1.4%
Age 40 to 44	11.7%	1.7%
Age 45 to 49	11.6%	1.7%
Age 50 to 54	9.4%	1.4%
Age 55 to 59	7.3%	1.1%
Age 60 to 64	6.3%	0.8%
Age 65 and over	3.0%	0.5%

- 6.2.5 This suggests a workforce that is predominately male (87.7%) and predominately aged between the ages of 20 and 49 (67.4%).

Age and Gender Weightings

- 6.2.6 The Constabulary has analysed observed arrest, suspect, non-crime incident, and victim data to determine the proportional involvement of different age and gender groups in driving police demand. The rates of these incidents vary depending upon the demographics of the population. Table 6.2 and Table 6.3 below show the number and proportion of incidents involving various age and gender groups.¹¹ Table 6.3 then applies the following formula to derive age and gender weighting factors:

$$\text{Incident Weighting Factor} = \frac{\text{Incidents by age group and gender}}{\text{Total incidents} \times \text{proportion of age and gender group of population}}$$

- 6.2.7 The arrest weighting factor of 4.84 for 'Young Working Age' males suggests that for a population comprising 100% male Young Working Age individuals, the anticipated rate of arrests would be 4.84 times higher than the Suffolk per capita average. The incident weighting factors also show that in all cases,

¹⁰ 2011 Census data for the Construction Industry, supplied by QUOD (12/08/2020)

¹¹ The recording periods for total incidents vary depending on data availability.

people aged between 20 and 45 are more likely to be involved in policing incidents in Suffolk. In all cases where the person involved is a possible perpetrator, i.e., arrests and suspects, males are significantly more likely to be involved than females.

- 6.2.8 When considering arrest and suspect data, these impacts are sizeable. The incident weighting factors suggest that, given the demographic makeup of the construction workforce, a worker at SZC is 2.36 times more likely to be arrested or 1.95 times more likely to be suspected of a crime, than the Suffolk average.

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Table 6.2: Population and number of incidents observed by age group and gender

Age Group	Population			Arrests			Suspects			Non-crime			Victims		
	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total
Young	65,966	63,094	129,060	741	312	1,053	2,720	1,053	3,773	1,726	1,711	3,437	1,726	1,711	3,437
Young Working Age	61,410	57,121	118,531	16,117	2,825	18,942	10,896	3,544	14,440	5,189	5,862	11,051	5,189	5,862	11,051
Mid-Working Age	64,974	65,032	130,006	11,638	2,492	14,130	8,552	3,000	11,552	4,818	5,199	10,017	4,818	5,199	10,017
Older Working Age	100,445	103,915	204,360	5,394	1,138	6,532	4,355	1,567	5,922	5,155	4,126	9,281	5,155	4,126	9,281
Younger Retired	62,176	67,078	129,254	523	71	594	666	234	900	1,517	1,166	2,683	1,517	1,166	2,683
Older Retired	21,027	29,112	50,139	50	1	51	158	84	242	316	525	841	316	525	841
All ages	375,998	385,352	761,350	34,463	6,839	41,302	27,347	9,482	36,829	18,721	18,589	37,310	18,721	18,589	37,310
Sub-total aged 20 - 45	126,384	122,153	248,537	27,755	5,317	33,072	19,448	6,544	25,992	10,007	11,061	21,068	10,007	11,061	21,068

Table 6.3: Proportion of population and incidents observed by age group and gender

Age Group	Population			Arrests			Suspects			Non-crime			Victims		
	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total
Young	9%	8%	17%	2%	1%	3%	7%	3%	10%	5%	5%	9%	5%	5%	9%
Young Working Age	8%	8%	16%	39%	7%	46%	30%	10%	39%	14%	16%	30%	14%	16%	30%
Mid-Working Age	9%	9%	17%	28%	6%	34%	23%	8%	31%	13%	14%	27%	13%	14%	27%
Older Working Age	13%	14%	27%	13%	3%	16%	12%	4%	16%	14%	11%	25%	14%	11%	25%
Younger Retired	8%	9%	17%	1%	0%	1%	2%	1%	2%	4%	3%	7%	4%	3%	7%
Older Retired	3%	4%	7%	0%	0%	0%	0%	0%	1%	1%	1%	2%	1%	1%	2%
All ages	49%	51%	100%	83%	17%	100%	74%	26%	100%	50%	50%	100%	50%	50%	100%
Sub-total aged 20 - 45	17%	16%	33%	67%	13%	80%	53%	18%	71%	27%	30%	56%	27%	30%	56%

Table 6.4: Incident weighting factors by age group and gender

Age Group	Arrests			Suspects			Non-crime			Victims		
	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total
Young	0.21	0.09	0.15	0.85	0.35	0.60	0.53	0.55	0.54	0.53	0.55	0.54
Young Working Age	4.84	0.91	2.95	3.67	1.28	2.52	1.72	2.09	1.90	1.72	2.09	1.90
Mid-Working Age	3.30	0.71	2.00	2.72	0.95	1.84	1.51	1.63	1.57	1.51	1.63	1.57
Older Working Age	0.99	0.20	0.59	0.90	0.31	0.60	1.05	0.81	0.93	1.05	0.81	0.93
Younger Retired	0.16	0.02	0.08	0.22	0.07	0.14	0.50	0.35	0.42	0.50	0.35	0.42
Older Retired	0.04	0.00	0.02	0.16	0.06	0.10	0.31	0.37	0.34	0.31	0.37	0.34
All ages	1.69	0.33	1.00	1.50	0.51	1.00	1.02	0.98	1.00	1.02	0.98	1.00
Sub-total aged 20 - 45	4.05	0.80	2.45	3.18	1.11	2.16	1.62	1.85	1.73	1.62	1.85	1.73

6.3 Population Based Police Resourcing Implications – Model Parameters

Number of Incidents

- 6.3.1 The number of additional incidents associated with the NHB workforce has been estimated by applying per-capita rates of investigations, arrests, and emergency and non-emergency calls observed across Suffolk.
- 6.3.2 This approach accounts for the expected demographic profile of the SZC construction workforce by applying the age and gender weightings outlined in Table 6.4 above. Using the unadjusted per-capita incident rates would only be appropriate if the demographics of the NHB construction workforce closely mirrored the existing demographic profile of Suffolk. As Table 6.5 below shows, this is not the case.

Table 6.5: Proportion of population aged 16+, NHB construction workforce and Suffolk

	Construction workforce			Suffolk population			Difference		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
Age 16 to 19	2%	0%	3%	2%	2%	5%	-0%	-2%	-2%
Age 20 to 21	3%	0%	3%	1%	1%	2%	+2%	-1%	+1%
Age 22 to 24	5%	1%	6%	2%	2%	4%	+3%	-1%	+2%
Age 25 to 29	9%	1%	11%	4%	3%	7%	+6%	-2%	+4%
Age 30 to 34	9%	1%	10%	4%	4%	7%	+5%	-2%	+3%
Age 35 to 39	10%	1%	11%	4%	4%	7%	+6%	-2%	+4%
Age 40 to 44	12%	2%	13%	3%	3%	7%	+8%	-2%	+7%
Age 45 to 49	12%	2%	13%	4%	4%	8%	+8%	-2%	+5%
Age 50 to 54	9%	1%	11%	4%	4%	9%	+5%	-3%	+2%
Age 55 to 59	7%	1%	8%	4%	4%	8%	+3%	-3%	+0%
Age 60 to 64	6%	1%	7%	4%	4%	8%	+3%	-3%	-1%
Age 65 and over	3%	1%	4%	13%	15%	29%	-10%	-15%	-25%
Total	88%	12%	100%	49%	51%	100%	+39%	-39%	-
Sub-total aged 20 - 49	59%	8%	67%	21%	21%	42%	+38%	-12%	+26%

- 6.3.3 The Applicant predicts that the majority of the NHB workforce (88%) will be male, and over two-thirds (67%) will be between the ages of 20 and 49. The population of Suffolk, by contrast, is significantly older with the majority (54%) aged 50 or above.
- 6.3.4 To illustrate this process, Table 6.6 below presents the calculation of the anticipated number of criminal investigations associated with the NHB workforce in each year.

Table 6.6: Anticipated criminal investigations

Year:	1	2	3	4	5	6	7	8	9	10	11	12
Average NHB construction workforce	524	1,062	2,134	3,019	4,347	5,024	5,780	4,726	2,721	920	589	283
Unweighted number of	39	79	159	225	324	375	431	353	203	69	44	21

Year:	1	2	3	4	5	6	7	8	9	10	11	12
investigation s												
Incidents Adjustment Factor	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9
Expected Offences (Age + Gender)	76	153	308	436	628	725	835	682	393	133	85	41

6.3.5 Per-capita rates of criminal investigations suggest that the NHB workforce will give rise to 2,323 additional criminal investigations over the 12-year build period. Once weighted for the anticipated demographic profile of the workforce, this increases to 4,495.

6.3.6 Non-crime investigations, missing person investigations, and mental health callouts have been calculated in the same way. The results of this are presented in Table 6.7 below. Similar calculations have been undertaken to estimate the number of arrests (demand on custody services) and emergency and non-emergency calls (demand on CCR services).

Table 6.7: Anticipated number of incidents, Local Policing only

	Criminal Investigations			Non-Crime Investigations			Missing Person Investigations			Mental Health Callouts			Total Incidents		
	Workers	Family	Total	Workers	Family	Total	Workers	Family	Total	Workers	Family	Total	Workers	Family	Total
Year 1	76	8	84	13	3	16	1	1	2	2	1	3	92	13	105
Year 2	154	16	170	25	5	30	2	1	3	4	1	5	185	23	208
Year 3	309	32	341	50	10	60	3	2	5	7	2	9	369	46	415
Year 4	436	45	481	70	14	84	5	3	8	10	2	12	521	64	585
Year 5	628	65	693	100	20	120	6	4	10	14	3	17	748	92	840
Year 6	726	75	801	116	23	139	7	5	12	16	4	20	865	107	972
Year 7	835	86	921	133	27	160	8	6	14	18	4	22	994	123	1117
Year 8	683	71	754	109	22	131	7	5	12	15	3	18	814	101	915
Year 9	393	41	434	63	13	76	4	3	7	9	2	11	469	59	528
Year 10	133	14	147	22	5	27	2	1	3	3	1	4	160	21	181
Year 11	86	9	95	14	3	17	1	1	2	2	1	3	103	14	117
Year 12	41	5	46	7	2	9	1	1	2	1	1	2	50	9	59

Resourcing Requirements

6.3.7 The next stage of the assessment is estimating the number of FTE additional officers and police staff required to address additional demand within the three main affected policing areas (Local Policing, Custody, and CCR).

6.3.8 This has been undertaken by dividing the total number of additional incidents by the average workload of staff in each service. To illustrate this, Table 6.8 below shows the average workload of a Local Policing officer in the Constabulary.

Table 6.8: Incidents per Local Policing officer, 2019

	Total incidents	Incidents per officer
Criminal Investigations	56,331	46.2
Non-crime investigations	17,895	14.7
Mental health calls	2,289	1.9
Missing person calls	3,587	2.9
Total	80,102	65.7

- 6.3.9 This suggests that the average Local Policing officer handles between 65 and 66 cases annually. The impact model applies this rate, and the corresponding rates for Custody and CCR staff, to the projected number of incidents to derive a resourcing requirement in FTE terms. Table 6.9 below again shows the Local Policing calculation to illustrate this process.

Table 6.9: Resourcing requirements, Local Policing only

	Total Incidents	FTEs required	Rounded to whole post
Year 1	105	1.6 FTE	2 FTE
Year 2	208	3.2 FTE	4 FTE
Year 3	415	6.3 FTE	7 FTE
Year 4	585	8.9 FTE	9 FTE
Year 5	840	12.8 FTE	13 FTE
Year 6	972	14.8 FTE	15 FTE
Year 7	1,117	17.0 FTE	17 FTE
Year 8	915	13.9 FTE	14 FTE
Year 9	528	8.0 FTE	9 FTE
Year 10	181	2.8 FTE	3 FTE
Year 11	117	1.8 FTE	2 FTE
Year 12	59	0.9 FTE	1 FTE
Total	6,042	91.9 FTE	96 FTE

- 6.3.10 In accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.
- 6.3.11 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.
- 6.3.12 For the avoidance of doubt, the Constabulary will use the nationally recognised NPCC full cost recovery rate for police officers which will include associated vehicles, training, and police staff. As such, while Custody and CCR have been included in the modelling, only the net increase in Local Policing resource requirements will be sought for mitigation.

6.4 Construction Traffic Based Policing Demand and Resourcing Implications - Approach

Road Safety Issues

- 6.4.1 As a result of increased traffic on Suffolk's road network there will be a need for additional roads policing cover that will be needed for the additional traffic on the network resulting from the construction of the SZC project. The need to carry out enhanced high visibility patrols, driver, and vehicle safety tests, attend collisions and monitor the vehicles for speeding or dangerous driving on those roads and key arteries that will be used by the Applicant and their suppliers. Such proactive work will help address the increased demand created by SZC construction traffic and make the road network safer by reducing the risk of collisions and costly delays.

Police Escorts for AIL Movement

- 6.4.2 As raised previously in this WR, the prime concern of the Constabulary's relates to impacts on roads policing as a consequence of the construction phase for SZC is the management of a substantial volume of AIL movements.
- 6.4.3 The Constabulary has engaged with the Applicant to seek to predict the volume and frequency of AIL movements during the SZC construction phase. Concerns have been raised by the Constabulary about the impacts that such movements would have on the safe and efficient operation of the affected road network. The Constabulary has also noted that likely impacts on the road network could be significantly reduced (i.e. mitigated) through the involvement of the Constabulary where appropriate in escorting and providing assistance to guide the movement of the largest, widest and heaviest loads as well as where police direction would be required to overcome the contravention of road regulations (e.g. double white line systems) in order to facilitate safe passage of the road network contrary to signed restrictions.

Context

- 6.4.4 In accordance with relevant NPCC guidance, the routine escorting of vehicles falling within the provisions of the STGO ('AILs') under normal network operations does not normally require to be carried out by the Constabulary and in most cases is carried out by hauliers themselves. Crucially however, this is dependent upon the route and specific characteristics of each proposed AIL movement, review of submitted Movement Notices¹² and the outcome of a specific risk assessment made by the Constabulary's Abnormal Loads Officer. Exceptions may and do occur where no alternative arrangement can adequately ensure public safety, such as where Highway regulations have to

¹² Where a window specified in a submitted Movement Notice is approved, no further notification would be required if the AIL is moved on an alternative date within that notice window and in accordance with the daily time periods stipulated by the Abnormal Loads Officer. Movement Notices often cover a few weeks from the date the AIL is first proposed to be moved. This is to allow resilience in the period to undertake the movement – allowing for such matters as changes in weather conditions; breakdowns; and programme changes. The extended movement window may be approved by the Abnormal Loads Officer following a risk review of the implications on the designated route. Notifications which exceed a four-week period are typically refused.

be contravened during the movement of the AIL and associated vehicle, such that police escorting is required¹³.

- 6.4.5 Under current arrangements, police assistance can also be requested by hauliers for managing specific pinch points on the route (e.g. travelling on the wrong side of keep left instructions). This is a pro gratis service that is offered if, and when, there is police operational capacity to assist. Although booked in advance, operational requirements take precedence, which can result in delays for the haulier while they wait for officers to be available.
- 6.4.6 Current restrictions on AIL movements normally govern roads, times and/or days that a load is permitted to move. In accordance with Policy No 19 published by Norfolk and Suffolk Constabularies on December 2016¹⁴, this normally prevents an AIL from travelling during:
- Bank holidays and weekends;
 - The hours of darkness, except the A12 Essex Border to A14 Copdock Interchange and A14 Felixstowe to Cambridge Border with width, weight and length restrictions;
 - During periods where a major event has been planned;
 - At certain times of days such as “rush hours” and high commuter traffic between 07:30 – 09:00 and 16:30 -18:00; and
 - Other times at the discretion of the Abnormal Loads Officer.
- 6.4.7 These restrictions, which are in place to protect the functioning of the road network and public amenity from unacceptable impacts, are likely to cause significant challenges to the efficient movement of high volumes of AILs across Suffolk’s road network over a sustained period.

SZC AIL Movements Likely to Require Police Escort

- 6.4.8 Reflecting the proposed construction of SZC and the predicted number of AILs and HGVs, the Constabulary has prepared a matrix which summarises the escort requirements for the affected road corridors per vehicle size. The escort requirements are based on a risk assessment carried out by the Abnormal Loads Officer and Traffic Management Officer and identifies roads with a higher risk due to vehicle dimensions.

¹³ This might include contravening a keep left direction or crossing a system of solid white lines on a specific road or section thereof.

¹⁴ ‘Abnormal Loads, Policy No. 19’ Source: https://www.norfolk.police.uk/sites/norfolk/files/abnormal_loads.pdf

The Constabulary's AIL Escort Matrix This Matrix provides a risk assessed guide for the movement of AILs during the SZC construction period. All AIL movements are subject to review by the Constabulary's Abnormal Loads Officer; where the full extent of the route and specific load dimension will be assessed and the appropriate level of risk determined.					
Key High Risk (Red) – Recommended that vehicles should have Police Escort Medium Risk (Amber) – Police escort is recommended, although hauliers may choose to self-escort; however, police assistance may be required at specific points. Medium-Low Risk (Light Green) – Hauliers should consider Self-Escort for the vehicle Low Risk (Dark Green) – No Escort Required					
	A14	A12 Lowestoft to Leiston	A12 Woodbridge to Leiston	B1122 Lovers Lane	A145
VR1					No AILs Permitted
Special Order					No AILs Permitted
STGO Cat 3					No AILs Permitted
STGO Cat 2					No AILs Permitted
STGO Cat 1					No AILs Permitted
>5m wide					No AILs Permitted
4.4m - 5m wide					No AILs Permitted
3.5m - 4.4m wide					No AILs Permitted
2.9m - 3.5m wide					No AILs Permitted
<2.9m wide					No AILs Permitted
Length <18.64m					No AILs Permitted
Length between 18.65m - 27.3m					No AILs Permitted
Length between 27.4m – 30m					No AILs Permitted
	A14	A12 Lowestoft to Leiston	A12 Woodbridge to Leiston	B1122 Lovers Lane	A145

Figure 6.1: AIL Management Matrix

- 6.4.9 The categories of AIL anticipated for the SZC project have been applied to the standard guidelines for each section of the access routes. A pragmatic risk assessment has informed when the Constabulary considers AILs should either be allowed to travel to the main works site or associated developments without a private escort; when a private escort would be required; when a Police escort would be required; or police assistance advised.
- 6.4.10 The Matrix proposed sets out the risk assessment and application of the guidelines. During the construction of SZC this matrix would be applied to all AILs using the defined routes, irrespective of their association with SZC. The matrix provides a guide as to the escorting of AILs. However, as with all AIL movements these are subject to the final sign off by the Abnormal Loads

Officer. It is current practice that the Abnormal Loads Officer liaises with hauliers and contractors to identify risk and the appropriate level of escort.

- 6.4.11 The proposed matrix reflects an increased intervention by the Constabulary to assist with the more efficient and safe operation of AILs to SZC both prior to and following the mitigation measures proposed by the Applicant. The construction of the Two Villages' Bypass and the Sizewell Link Road ('SLR') will circumvent some areas of safety concern along the access corridors but will not remove all concerns or remove all points at which AILs would be required to contravene road regulations. There would, therefore, continue to be a much-increased demand on the Constabulary's Abnormal Loads unit and associated trained officers.
- 6.4.12 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day (*EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021*). These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.
- 6.4.13 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL movements requiring police escort during the SZC construction period. Additional resources are therefore required, in the form of a dedicated AIL Unit, to allow the Constabulary to facilitate the proposed construction period for SZC and associated passage of AILs along Suffolk's road network in an efficient and safe manner.
- 6.4.14 The Applicant has commissioned Wynns Limited to prepare a review of the feasibility of the use of the identified AIL access routes by selected types of vehicle and load combinations (*Abnormal Indivisible Load (AIL) Access Report Sizewell C – 07.04.21 – copy currently provided informally by EDF*). That report identifies a series of challenges with access to SZC where AILs would be required to occupy the full width of the road and could oversail beyond the carriageway. It indicates that vehicle and load combinations would be required to use dedicated AIL infrastructure and over-run areas within modified and new junctions. Where AILs are required to operate in this manner, it is essential for police escorts to safely manage the network around that movement. The Wynns report substantiates the Constabulary's concerns.

7 Population Based Community Safety and Policing Impacts

7.1 Overview

7.1.1 The substantial demographic changes from the predicted construction workforce are anticipated to result in changes in safety, crime, and welfare related incidents. These changes will increase the demand for, and associated workload, of three primary policing functions:

- **Local Policing:** the initial area that identifies policing and community issues, which may be handled by local officer resources but often also requires county-wide specialist input.
- **Custody:** transport to and detainment of arrested persons in specific premises.
- **CCR and CCC:** the area that handles all calls and co-ordinates action taken by the Constabulary, including but not limited to responding to emergency incidents.

7.1.2 This section outlines the Constabulary's current demand and resourcing structure in respect of these three main policing functions before setting out forecasted additional resourcing demands likely to be generated by the SZC construction workforce.

7.1.3 As detailed in Section 9, Suffolk is seeking mitigation by applying the nationally recognised NPCC full cost recovery rate for police officers to the anticipated Local Policing FTE resource requirement. This rate includes associated vehicles, training, and police staff. As such, while Custody and CCR have been included in the modelling, this is purely illustrative. Only the net increase in Local Policing resource requirements will be sought for mitigation.

7.2 Local Policing

Existing Demand and Resourcing

7.2.1 Local policing is the initial area that identifies policing and community issues, which may be 'problem solved' by local policing resources but often also require county-wide specialist input. Issues identified are often those that if not addressed early will result in criminality and associated community tensions i.e., County Lines, Fly Parking and ASB activity, which in turn increases the likelihood of flashpoints between the established community of an area and others (e.g., the SZC construction workforce). As with all other policing areas within the Constabulary, local policing is at capacity and is operating to the maximum level that current funding and resourcing allows. **Therefore, any increase in demand needs to be met with additional resources, else the current service delivered will be adversely impacted upon.**

7.2.2 The Eastern Police Area is the first point of contact for the immediate day-to-day policing of Leiston, including responding to crimes and incidents, attending non-fatal road accidents, maintaining public order and partnership problem solving. Leiston, together with other pockets within the Eastern Police Area and Halesworth LPC, has long been recognised as an area faced with multiple deprivation and has specific policing needs above that of other more affluent areas of the county. Halesworth LPC includes a dedicated Leiston SNT, although effective local policing also relies on county-wide policing resources.

Operational Structure

7.2.3 In 2019 police officers dealt with 80,102 investigations. The Constabulary currently has an establishment of 1,219 FTE¹⁵ police officers that provide 24-hour coverage throughout the year. This equates to each police officer dealing with an average of 65.7 investigations in a year, which is one of the highest workload figures for policing in England.

7.2.4 All reported incidents and crimes are recorded and assessed within the CCR. If an offender is identified, local enquiries are needed or if the original report requires the attendance of an officer then the most appropriate and suitable department from the relevant policing district is instructed to attend the incident. There are four main local policing teams in each of the police command areas:

- **Neighbourhood Response Teams (NRTs):** Any urgent graded calls into the CCR will be allocated to the NRT's. The NRT officers aim to arrive at the scene of an incident within 15 minutes in an urban area or 20 minutes in a rural location from the time of the call. The range of incidents that NRT's respond to can be anything from missing people, reports of crime where incidents are occurring at the time, mental health, road traffic collisions and incidents that are time critical.
- **Safer Neighbourhood Teams (SNTs):** SNT's work alongside the NRT's to provide a community policing team that manages longer-term community problems. The issues can range from neighbourhood disputes to complex and protracted community issues that require a substantial amount of resources and time, often engaging other key partners, to resolve.
- **Criminal Investigation Department (CID):** CID will normally investigate and manage more complex criminal investigations including domestic burglaries, high value acquisitive crime, robberies, high value fraud and investigations where there is high risk of harm including stalking and harassment cases.
- **Safeguarding Investigation Unit (SIU):** The SIU will investigate criminal cases where the allegation is of a serious sexual nature or its involving child abuse. The SIU has officers who work closely with the social services team

¹⁵ Data as of March 2020 Home Office data: Police Workforce, England and Wales: 31 March 2020: data tables second edition. Sourced from <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2020>

and often undertake joint visits to vulnerable adults and children who have been or who are at risk of harm.

- 7.2.5 These local policing teams do not work in isolation as they are very much dependant on Countywide specialist departments and funded teams (Table 7.1). Be it from a localised resource or countywide, as stated in previous sections, all facets of the modern policing service are interlinked and may be called upon when addressing policing and community safety issues i.e., members of the SNT may respond to an initial call, but through the nature of the investigation as it progresses specialist countywide resources may be called upon.

Table 7.1: Local Policing Resources

Local Policing Units	Specialist Teams
Criminal Investigation Department (CID)	Area Intelligence Unit (AIU)
Neighbourhood Response Team (NRT)	Cyber Crime Team
Safer Neighbourhood Team (SNT)	Digital Forensic Team
Safeguarding Unit (SIU)	Cyber Enabled Team
Neighbourhood and Partnership Team (NPT)	Online Investigation Team (OLIT)
	Crime Scene Investigation (CSI)
	Rural Crime Team
	Covert Policing Unit
	Scorpion Team
	Sentinel Team
	Dog Unit
	Roads and Armed Policing (RAPT)
	Forensic Services
	Specialist Operations
	Serous and Organised Crime
	Major Investigations Team (MIT)

Existing Demand

- 7.2.6 Demand on local policing includes the following:

- **Criminal investigations:** in 2019, there were 1,120 criminal investigations recorded within the Leiston SNT area; accounting for 10% of total number of criminal investigations recorded for Eastern Policing Area that year and 2% of the total for the whole of Suffolk.
- **Non-crime investigations:** involve crimes or incidents that do not need to be reported to the Home Office (non-notifiable) but still need to be recorded, such as domestic violence, child protection investigations, ASB, missing person investigations and mental health calls
- **Other additional demands:** five additional key areas which have an impact on police resources: Mental health episodes, suicides, missing person investigations, unmeasured demand and community tensions/liaison. The demand generated by these events are not recorded in the crime or non-

crime investigation figures but account for a significant proportion of routine police work.

7.2.7 Appendix F provides a detailed review of recent demand on local policing in Suffolk.

Forecast Demand from Construction Workforce

7.2.8 Table 7.2 overleaf shows the level of resourcing required within local policing to address the predicted annual average NHB workforce over the anticipated 12-year construction programme. The level of resourcing in terms of FTE officers is rounded up to the nearest post if the demand generated meets or exceeds 0.2 FTE. With suspect age and gender weightings applied, the expected population increase of non-home-based workers (5,884) at peak would likely see a minimum upsurge in the number of crime investigations by 951 at peak. Only through this mitigation will the Constabulary have the ability to maintain its exiting levels of service to its communities, a level of service that those who live. Work, travel and invest in the county deserve and expect. Without this we risk compromise to this service delivery.

Table 7.2: Predicted Average Annual Local Policing Demand

Construction Year	Average Annual NHB Workforce	NHB Criminal Investigations	NHB Non-Crime Investigations	NHB Missing Person Investigations	NHB Mental Health Callouts	Family Criminal Investigations	Family Non-Crime Investigations	Family Missing Person Investigations	Family Mental Health Callouts	Combined Increase in Criminal Investigations	Combined Increase in Non-Crime Investigations	Combined Increase in Missing Person Investigations	Combined Increase in Mental Health Call Outs	Total Increase in Local Policing Demand	Local Policing Officer Workload	Local Policing Officers FTE Requirement
1	524	75.0	13.0	1.0	2.0	88.0	27.0	6.0	4.0	163.0	40.0	7.0	6.0	216.0	65.7	4
2	1062	151.0	25.0	2.0	4.0	88.0	27.0	6.0	4.0	239.0	52.0	8.0	8.0	307.0		5
3	2134	302.0	50.0	3.0	7.0	88.0	27.0	6.0	4.0	390.0	77.0	9.0	11.0	487.0		8
4	3019	428.0	70.0	5.0	10.0	88.0	27.0	6.0	4.0	516.0	97.0	11.0	14.0	638.0		10
5	4347	615.0	100.0	6.0	14.0	88.0	27.0	6.0	4.0	703.0	127.0	12.0	18.0	860.0		14
6	5024	711.0	116.0	7.0	16.0	88.0	27.0	6.0	4.0	799.0	143.0	13.0	20.0	975.0		15
7	5780	818.0	133.0	8.0	18.0	88.0	27.0	6.0	4.0	906.0	160.0	14.0	22.0	1102.0		17
8	4726	669.0	109.0	7.0	15.0	88.0	27.0	6.0	4.0	757.0	136.0	13.0	19.0	925.0		15
9	2721	385.0	63.0	4.0	9.0	88.0	27.0	6.0	4.0	473.0	90.0	10.0	13.0	586.0		9
10	920	131.0	22.0	2.0	3.0	88.0	27.0	6.0	4.0	219.0	49.0	9.0	7.0	283.0		5
11	589	84.0	14.0	1.0	2.0	88.0	27.0	6.0	4.0	172.0	41.0	8.0	6.0	226.0		4
12	283	41.0	7.0	1.0	1.0	88.0	27.0	6.0	4.0	129.0	34.0	7.0	5.0	175.0		3

7.3 Custody Management

Existing Demand and Resourcing

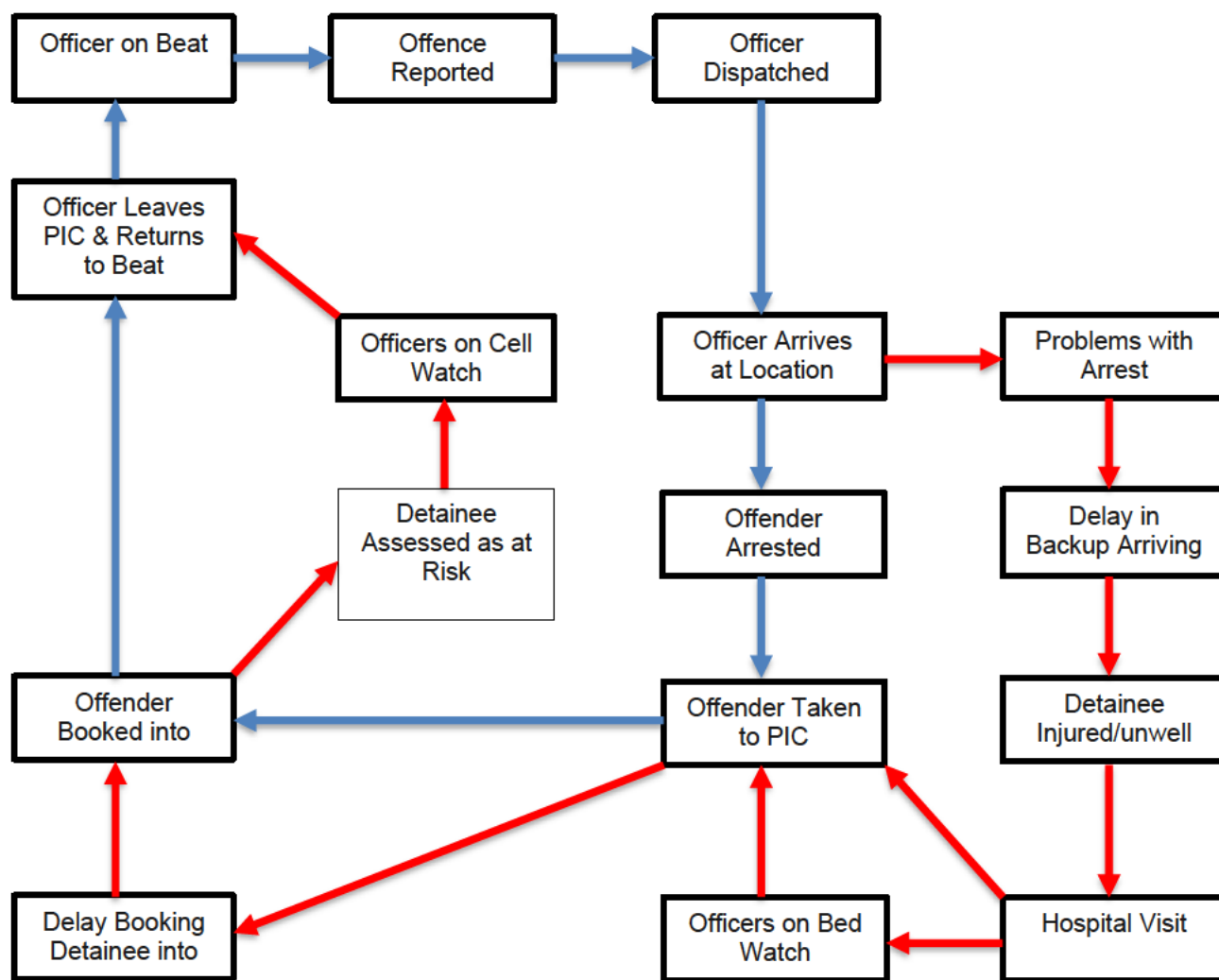
- 7.3.1 Custody refers to the Constabulary premises where persons are taken to after they have been arrested. Custody in Suffolk is a joint service shared with our partner Constabulary, Norfolk. Custody premises within Suffolk and Norfolk are referred to as Police Investigation Centres ('PIC').

Operational Structure

- 7.3.2 Custody for the Halesworth police jurisdiction is covered by all three of the Constabulary's Police Investigation Centres (PIC): Bury St Edmunds (approximately 44 miles), Martlesham (approximately 19 miles) and the last at Great Yarmouth (approximately 33 miles). The PIC at Great Yarmouth is shared with Norfolk Constabulary.
- 7.3.3 Each PIC is staffed by police officers and staff, but due to the specialist nature of the work conducted in the PIC, these resources need specific training to the agreed national level. This means that the staff capable of working within a PIC are restricted; not all staff can work duties that fall within the PIC.

Custodial Process

- 7.3.4 Upon arrest the arresting police officers are directed to the nearest PIC with capacity and cell space in order to book the detainee into custody and follow a set of statutory actions under the Police and Criminal Evidence Act 1984. For this reason, whilst the three PICs have distinct geographical locations, custody is treated as a county wide resource as an arrested person could be sent to any of the PICs.
- 7.3.5 As Figure 7.1 shows, arrests are by nature time consuming and resource intensive - particularly as the Constabulary policy requires a minimum of two officers to transport the detainee to the closest PIC with capacity. The blue arrows show a typical arrest while the red show some of the difficulties and delays officers can face during the arrest process.



Note: blue arrows show typical arrest process. Red arrows show likely causes of delays.

Figure 7.1: Arrest process

7.3.6 An arrest in the Leiston area takes a minimum of 2 hours from the point of arrest until those officers are back on duty.¹⁶ If there are difficulties, such as the detainee resists arrests, is unwell (either mental health, illness, injury, or drugs) requiring a hospital visit or there is a delay booking the detainee into the PIC, it can take officers over 6 hours to return to duty.¹⁷

7.3.7 This time can increase significantly (12+ hours) if the detainee is admitted to hospital requiring officers to stay and take shifts on 'bed watch' duty until such a time as the detainee is released from medical care and can be booked into custody. Once booked into custody, the arresting officers are usually able to return to their other duties.

7.3.8 However, if the detainee is judged to be at risk of harming themselves, be this through drunkenness, drugs or mental fragility that could lead to self-harming if left alone, the arresting officers can be required to stay at the PIC on cell

¹⁶ 45 minutes minimum travel time to the nearest PIC with capacity, 30 minutes hand over/booking in time to transfer the detainee to custody followed by 45 minutes travel back to base/officer beat.

¹⁷ 60 - 90 minutes travel to the nearest hospital to the destination PIC, 3-hour triage waiting time in A&E (NHS average A&E waiting time 2018, NHS Digital and NHS England), 15 minutes travel time from hospital to PIC. 1 – 2 hour waiting time to book in detainee during busy periods. 60-minute drive back to base/officer beat.

watch in order to safeguard the wellbeing of the detainee. The period that the officers are required to stay with the detainee can be influenced by external factors (i.e., the availability of appropriate medical resources).

Current Resource Capabilities

7.3.9 Table 7.3 shows the current staff levels across the PICs. Staffing is divided between three shifts providing 24-hour coverage across each PIC. The composition of each team depends upon the shift, location, predicted demand and abstraction rates.

7.3.10 Staffing rosters are determined three months (or 90 days) in advance in accordance with Police regulations. Where shift changes are required the duties planner will handle any duty changes where more than 24 hours' notice is given. If less than 24 hours are given the Custody Bronze Inspector will deal with any changes; this includes the decision to deploy on-call custody detention officers ('CDOs') to specific locations in the event of a sudden increase in custody traffic beyond the levels expected in the standing resource allocation.

Table 7.3: Current custody staffing levels

PIC	Posts	No. of FTE Posts
Bury St. Edmunds	Inspector	1
	Sergeants	11
	Custody Detention Officers (CDO)	15.68
	Virtual Court Detention Officers	1
Martlesham	Inspector	1
	Sergeants	11
	Custody Detention Officers (CDO)	15.68
	Virtual Court Detention Officers	1
Great Yarmouth	Inspector	1
	Sergeants	11
	Custody Detention Officers (CDO)	15.68
	Virtual Court Detention Officers	1

7.3.11 A flexible custody model which allows for a sudden influx of demand by using zero-hour contract CDOs and staff to meet resourcing needs is used within the PICs. Call-in CDOs are fully trained that have zero-hour contracts. In the event that additional CDOs are needed the Bronze Custody Inspector can give authorisation for these Call-in CDOs to be deployed to the relevant PIC. This allows for an adaptable and flexible strategy without the need to have additional permanent FTE posts as baseline capacity based at each PIC in the event that more resources are required.

7.3.12 The alternative option to the above model is to re-deploy staff available at other PICs or draw on resources from County Policing Command ('CPC'), as some officers on duty at the point of increased demand will have been trained to work

in the PICs. This method may leave other policing areas under resourced and vulnerable. Suffolk Custody is currently working to capacity. In the event of a rise in arrests because of SZC, extra resources will be necessary to meet the increased demand created.

Existing Demand

7.3.13 Consistent with national trends, there has been a gradual increase in the number of arrests in Suffolk since 2016. A key factor driving the rise in detentions is an increase in Higher Levels of Arrestable Offences. While nationally crime numbers remain relatively stable, there has been a significant rise in the number of serious and resource intensive crimes being reported to police forces.

7.3.14 Each CDO has an average caseload of 122.7 incidents a year. Appendix F provides a detailed assessment of recent demand on custody management in Suffolk.

Forecast Demand from Construction Workforce

7.3.15 With suspect age and gender weightings applied, the expected population increase of non-home-based workers (5,884) at peak would likely see a minimum upsurge in the number of arrests by 176 at peak – equivalent to the caseload of 1.4 FTE CDOs.

7.3.16 Table 7.4 shows the level of resourcing required within custody management to address the predicted annual average NHB workforce over the anticipated 12-year construction programme. The level of resourcing in terms of FTE CDOs is rounded up to the nearest post if the demand generated meets or exceeds 0.2 FTE.

Table 7.4: Predicted Average Annual Custody Demand

Construction Year	Average Annual NHB Workforce	NHB Arrests	Family Arrests	Total Arrests	Workload per CDO per annum	CDO FTE Requirement
1	524	16.0	2.0	35.0	122.7	1.0
2	1062	32.0	4.0	53.0		1.0
3	2134	64.0	7.0	89.0		1.0
4	3019	90.0	9.0	118.0		1.0
5	4347	129.0	13.0	163.0		2.0
6	5024	149.0	15.0	185.0		2.0
7	5780	171.0	17.0	210.0		2.0
8	4726	140.0	14.0	175.0		2.0
9	2721	81.0	8.0	108.0		1.0
10	920	28.0	3.0	48.0		1.0
11	589	18.0	2.0	37.0		1.0
12	283	9.0	1.0	27.0		1.0

7.4 Contact and Control Room

Existing Demand and Resourcing

- 7.4.1 The Constabulary's Contact and Control Room ('CCR') at the Constabulary's Headquarters, Martlesham, handles all calls and co-ordinates action taken by the Constabulary's, including but not limited to responding to emergency incidents. This section outlines the Constabulary's current demand and resourcing structure in respect of CCR before setting out forecasted additional demands likely to be generated by SZC.
- 7.4.2 In 2019 there were 110,448 999 calls handled by the CCR in the Constabulary. This is the equivalent of 302 emergency calls every day throughout the year. Contact with the CCR is often the first point of engagement with the Constabulary and those calling are often in a state of high anxiety. It is therefore imperative that the appropriate level of service is afforded at this critical junction as a 'right service at first point of contact', approach leads to reduced demand on resources further on. The PCC requires the Constabulary to answer 999 within a set time; performance against this is reported regularly and the Chief Constable is held to account on meeting this target.
- 7.4.3 The Constabulary's CCR is presently operating at capacity – any increase in call volume will impact the Constabulary's continued ability to respond to 999 (emergency) and 101 (non-emergency) calls within the mandatory response times set out by the government¹⁸. The current performance target is 90%, the Constabulary are currently averaging a 91% call answering target. Any additional calls generated by SZC will negatively impact the Constabulary's continued ability to meet this target. A rise in call volume will also have implications for local policing services and the Crime Co-ordination Centre ('CCC') which deals with volume crime and non-emergency crime reports. An increase in calls to the CCR will have a corresponding increase in the demand managed by the CCC.

Call Triage Process

- 7.4.4 All calls come into CCR where they are assessed as shown in **Figure 7.2** below.

¹⁸ 999 calls should be answered within 10 seconds

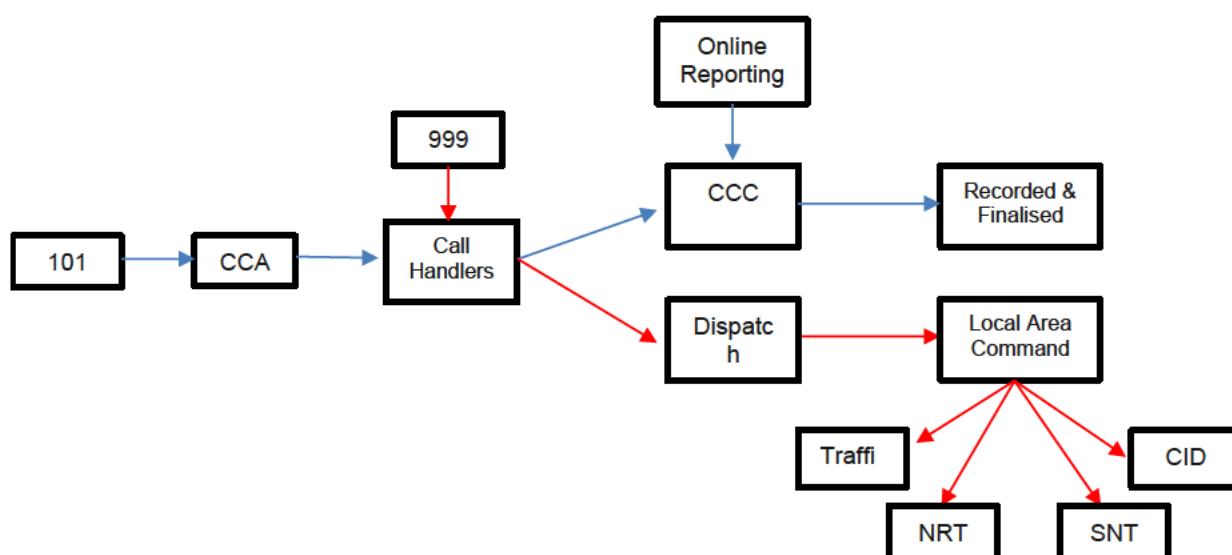


Figure 7.2: Call Triage Process

- **Emergency calls follow the red arrows:** 999 calls go direct to the call handlers where they are assessed. If an immediate response is needed, the call is passed to the dispatch team who then contact and direct the most appropriate operational resources in the area where the emergency is. If a unit is available to respond to the call they are then assigned a Computer Aided Dispatch ('CAD') and dispatched to the address of the incident.
- **Non-emergency calls follow the blue arrows:** 101 calls go first to the Central Call Answering switchboard ('CCA') where they are then assessed and passed to the call handlers. If it is an emergency then the call is passed to dispatch. If it is a call to report an offence or give intelligence, but is not an emergency, then the call is passed to the CCC for recording and finalisation.

7.4.5 The CCC is a separate department to the CCR and manages 101 calls and online reports. The core role of the CCC is to record, and manage the triaging of investigations into volume and priority crime. Volume crime is any crime that through the sheer number of offences has a significant impact on the community and the ability of the police to tackle it; such as criminal damage and vehicle crime. The CCC also manages Action Fraud referrals and online crime and incident reports.¹⁹ In an average year CCC deals with around 35,000 CADs and manages almost 80% of the volume crime demand, keeping a significant demand away from front line staff.

Current Resource Capabilities

7.4.6 The CCR has 120.8 FTE Call Handlers, 6.4 FTE back office and 10.4 FTE on the CCA switchboard. The CCR provides 24-hour telephone coverage for the

¹⁹ Action Fraud is the national reporting centre for Fraud and cybercrime in the UK.

999 and 101 numbers. At present the optimal number of call handlers is 14 on the day shift and 5 on the night shift.

- 7.4.7 CCC has 39 FTE posts divided into three teams all led by a Detective Sergeant. The teams are made up of Police Officers and Police Staff Investigators and vary in size.

Existing Demand

- 7.4.8 In 2019 there were 132,847 non-emergency (101) and 110,448 emergency (999) calls recorded by the Constabulary, equating to 666 calls per day. Over the last five years there has been a 40% increase in the number of 999 calls to the Constabulary with an average annual increase of around 8%.
- 7.4.9 This is the equivalent ratio of one call to every six people in Suffolk (18%). CCC handle on average approximately 35,000 CAD²⁰s per year. This is the equivalent of one CAD for every 22 people in Suffolk²¹. The current caseload of a CCR call handler is 2,010 calls annually. CCC staff handle, on average, 894 cases a year. Appendix F provides a detailed assessment of recent demand for CCR and CCC in Suffolk.

Forecast Demand from Construction Workforce

- 7.4.10 With suspect age and gender weightings applied, the expected population increase of non-home-based workers (5,884) at peak would likely see a minimum upsurge in the number of calls by 2,261 at peak – equivalent to the caseload of 1.1 FTE CCR call handlers. At the same time, there would be an anticipated increase of CADs by 322 – equivalent to the caseload of 0.4 FTE CCC staff.
- 7.4.11 Table 7.5 shows the level of resourcing required within custody management to address the predicted annual average NHB workforce over the anticipated 12-year construction programme. The level of resourcing in terms of FTEs is rounded up to the nearest post if the demand generated meets or exceeds 0.2 FTE.

²⁰ CAD stands for Computer Aided Dispatch

²¹ Or 4.6% of the 2018 estimated population of Suffolk.

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Table 7.5: Predicted Average Annual CCR and CCC Demand

Construction Year	Average Annual NHB Workforce	NHB Workers 999 Calls	NHB Workers 101 Calls	NHB Workers CADs	Family 999 Calls	Family 101 Calls	Family CADs	Increase in 999 Calls	Increase in 101 Calls	Total Increase in Calls	Increase in ICMH CADs	Workload per CCR per annum	Base Level CCR FTE Requirement	Workload per CCC per annum	Base Level CCS FTE Requirement
1	524	76.0	92.0	24.0	170.0	205.0	54.0	246.0	297.0	543.0	78.0	2010.7	1	897.4	1
2	1062	154.0	187.0	49.0	170.0	205.0	54.0	324.0	392.0	716.0	103.0		1		1
3	2134	310.0	375.0	98.0	170.0	205.0	54.0	480.0	580.0	1060.0	152.0		1		1
4	3019	438.0	530.0	138.0	170.0	205.0	54.0	608.0	735.0	1343.0	192.0		1		1
5	4347	630.0	763.0	198.0	170.0	205.0	54.0	800.0	968.0	1768.0	252.0		1		1
6	5024	729.0	882.0	229.0	170.0	205.0	54.0	899.0	1087.0	1986.0	283.0		1		1
7	5780	838.0	1014.0	263.0	170.0	205.0	54.0	1008.0	1219.0	2227.0	317.0		2		2
8	4726	685.0	830.0	215.0	170.0	205.0	54.0	855.0	1035.0	1890.0	269.0		1		1
9	2721	395.0	478.0	124.0	170.0	205.0	54.0	565.0	683.0	1248.0	178.0		1		1
10	920	134.0	162.0	42.0	170.0	205.0	54.0	304.0	367.0	671.0	96.0		1		1
11	589	86.0	104.0	27.0	170.0	205.0	54.0	256.0	309.0	565.0	81.0		1		1
12	283	42.0	50.0	13.0	170.0	205.0	54.0	92.0	255.0	347.0	67.0		1		1

8 Construction Traffic Based Community Safety and Policing Impacts

8.1 Overview

8.1.1 This section outlines forecasted additional roads policing demands likely to be generated by the construction phase of the SZC project.

8.2 Baseline Traffic Related CADs

8.2.1 The following data indicates the number of reported incidents on the A12 corridor between A14 and B1122 between 2016 and 2019. The data includes occurrences when the Constabulary was required to attend an incident which affected the operation of the network. Minor collisions which do not impede the flow of traffic or cause disruption to the road network are not commonly reported to the police.

8.2.2 In 2019 there were 19,757 traffic related CADs; a decrease of 6% from 2018. Traffic related CADs accounted for 13% of all CADs received within 2019.

8.2.3 Of the 19,757 traffic related CADs opened in 2019, 46% were relating to highway disruption (congestion, stationary traffic, broken down vehicles etc); 37% were road related offences and 17% were collisions where damage was reported. The following figure shows, there was a steady increase in Highway Disruption CADs between 2016 – 2018. There has also been a decline in the number of Road Traffic Collision ('RTC') CADs where damage was reported. This is in keeping with national trends and the proactive work by RAPT to reduce killed or seriously injured ('KSI') collisions on Suffolk roads.

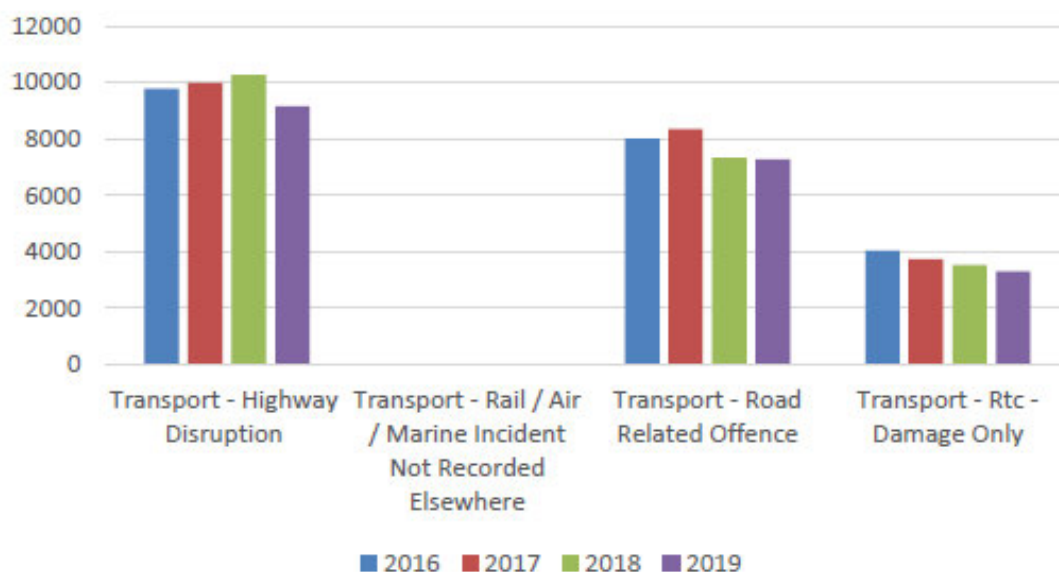


Figure 8.1: Traffic CAD Breakdown (2016 – 2019)

8.2.4 The Constabulary's records show that collisions on the A12 cause major disruption on the traffic. There were 15 fatal road traffic collisions that were recorded between 2008 to 2018. It is the Constabulary's policy to investigate collisions that are classified as potentially life threatening in the same way as fatal collisions. The affected roads are therefore closed for longer, delays increase as does congestion. The A12 corridor has no diversion routes of similar nature without significant additional mileage for any traffic.

8.3 Roads Policing Impacts from SZC

HGV Traffic

8.3.1 Information provided by the Applicant within the submitted SZC DCO application (as updated) and through a response to written clarifications from the Constabulary²² unfortunately does not confirm whether the proposed cap on HGV movements associated with the construction of SZC (not including the off-site facilities) include AIL movements. Irrespective, the Applicant predicts within its revised evidence that HGV movements at the SZC main development site would be capped at 500 HGVs (250 HGVs in and 250 HGVs out) on a typical day and 700 HGVs (350 HGVs in and 350 HGVs out) on a peak day. The Applicant acknowledges that this flow distributed as per the submitted Transport Assessment will generate significant increases in the percentage of HGV traffic on the roads used to access SZC. The percentages are open to interpretation between the Applicant and the Constabulary but the Applicant is currently predicting the range is from 19% on A12 north of Yoxford to 147% on A12 south of Yoxford, prior to the implementation of the SZC Link Road (SLR). At the site access the increase in HGV percentage is 284% in the morning peak period and 647% in the evening peak period.

8.3.2 The data indicates that the construction period for SZC and the associated off-site infrastructure will generate a significant increase in HGV traffic on the affected road network. The Constabulary considers that the increase in HGVs and as a percentage of the traffic is likely to bring an increase in incidents involving HGVs and delays to general journey times leading to driver frustration. An increase in incidents on Suffolk's road network will draw on the Constabulary's specialist roads policing resources in the management and investigations of those incidents.

Road Safety

8.3.3 The Transport Assessment ('TA') (APP-602) submitted in support of the SZC DCO application (EDF, May 2020) analysed the personal injury collision data which was obtained from Suffolk County Council (SCC) for the five-year period from May 2014 to May 2019. It was concluded in the TA that the studied personal injury collisions did not occur in significant concentrations to be classified as 'clusters' and common characteristics were not identified. However, collisions which involved HGVs were not distinguished.

²² Draft Suffolk Constabulary AIL Impact Assessment Report submitted to the Applicant in December 2020, response received 17th May 2021.

8.3.4 To assist with understanding the impact of HGV movements on the access corridors to the SZC project, the Constabulary has obtained personal injury collision statistics relating to HGV involvement from the Department for Transport (DfT) database²³, for the most recent six-year period (1 January 2014 to 31 December 2019).

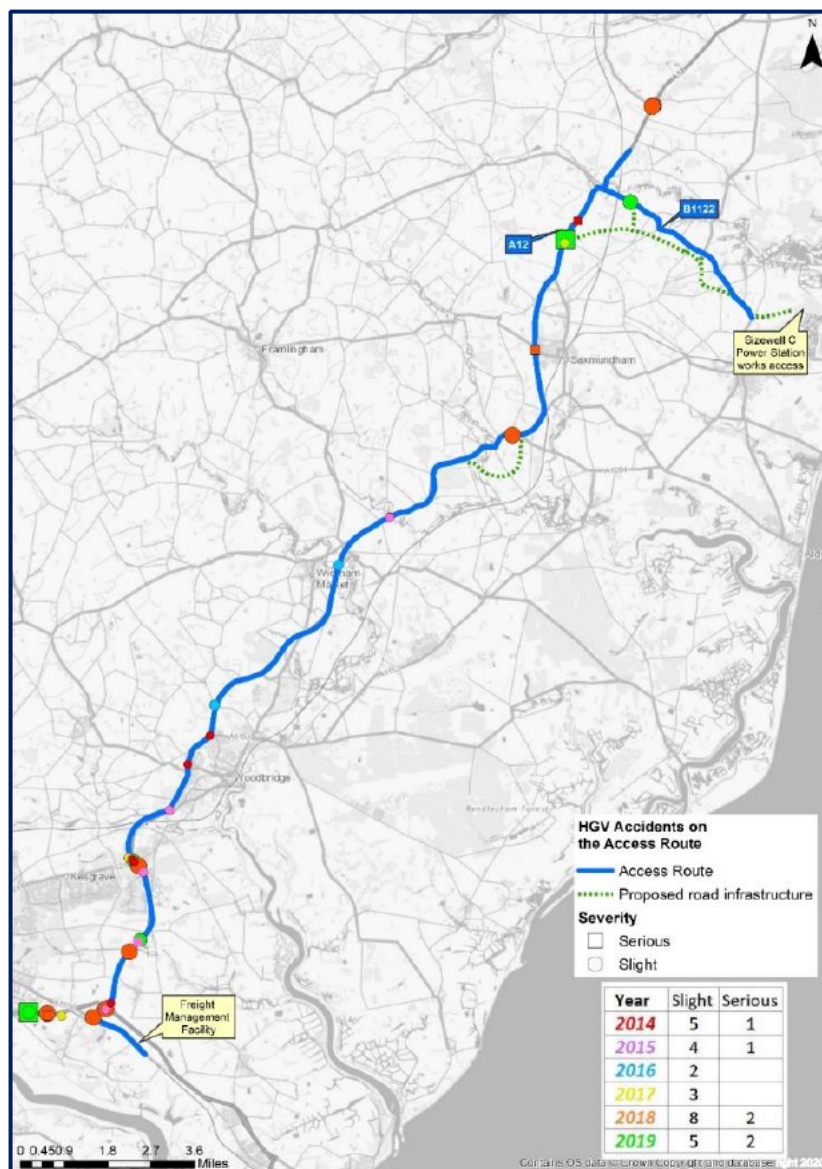


Figure 8.1: Collisions involving HGVs by location, year, and severity

8.3.5 HGV collisions that occurred on the A14, A12 and B1122 and in the vicinity of the access route during this six-year period are shown in Figure 8.2, broken down by year and severity. To align with the definition of HGV within the TA, the HGV category includes agricultural vehicles, goods vehicles over 3.5 tonne GVW and good vehicles of unknown weight.

8.3.6 Based on this data, a prediction model was created and potential incidents on the access route were estimated. Figure 8.3 below illustrates the number of

²³ 'Road Accidents and Safety Statistics', Source: <https://www.gov.uk/government/collections/road-accidents-and-safety-statistics>

collisions involving HGVs per year (from 2014 – 2019), as well as the prediction model (red dashed line) which best fits the historical data.

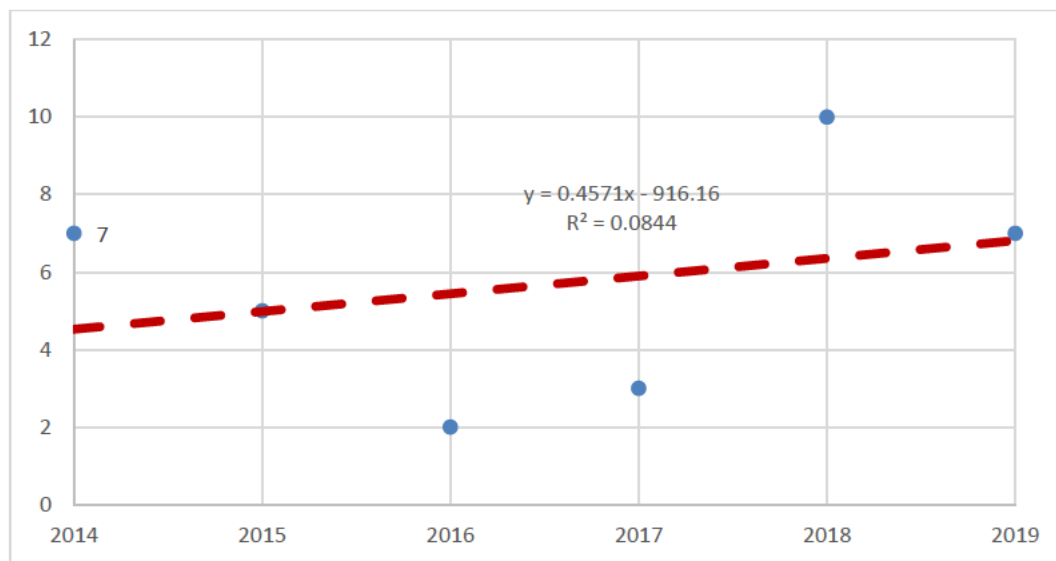


Figure 8.3: Collisions involving HGVs per year and 'fitting line'

- 8.3.7 The model shows an upward trend predicting 9 and 11 collisions for 2023 and 2028 respectively. This prediction does not take account of the increased number of HGVs and AILs on the network nor the increase in the proportion of HGVs within the total traffic flow that would be generated by SZC and consented developments. If collisions involving HGVs were to rise pro rata with the increase in HGV flow, then the number of incidents per year could treble. However, it is also acknowledged that the projection has not taken into consideration the proposed mitigation measures of the Sizewell Link Road or Two Villages' Bypass intended to reduce the effect of HGVs or AILs movements, albeit it is noted that only two collisions involving HGVs were recorded within the sections of route affected by the mitigation.
- 8.3.8 A cluster of six collisions involving HGVs was recorded, during the studied period, close to the A12/ A1214 roundabout east of Kesgrave. Of note is a further cluster of four collisions recorded close to or on the A12 / A14 roundabout (Seven Hills Interchange). Finally, three further collisions involving HGVs occurred on the west approach to the A12 / A14 roundabout.
- 8.3.9 Whilst the Two Villages' Bypass would circumvent challenging sections of the access route and the Sizewell Link Road would minimise the impact of the Project generated traffic in Yoxford, the data indicates that there are points along the corridor that have collision challenges that have not been mitigated and will be heightened by the increase in the number and proportion of HGVs within the traffic flow.

AIL Movements

Context

- 8.3.10 Responsibility for the safe management of AILs lies with the haulier and driver and is regulated by law. The dimensions and weights of vehicles used on British

roads are regulated by the ‘*Road Vehicles (Construction & Use) Regulations 1986*’²⁴ (C&U) and the ‘*Road and Vehicles (Authorised Weight) Regulations 1998*’²⁵. As such, the Road Vehicles (Authorisation of Special Types) (General) Order 2003 (STGO) and the C&U stipulate the dimensions and classifications of vehicles and associated loads that constitute AILs and the conditions for use of the specifically designed vehicles which carry AILs. Within the context of these statutory requirements, the Suffolk and Norfolk Constabularies’ Joint Policy on Abnormal Loads (dated 08.12.16 (Interim)) gives the summary description of an AIL as “....a load that cannot without undue expense or risk of damage be divided into two or more loads for the purpose of being carried on a road”.

8.3.11 The role of the Constabulary in respect of facilitating most AILs is to ensure compliance with applicable law and guidance. In exercising this duty, following a risk assessment of the route to be taken by the haulier, the Constabulary may determine that a Police escort or assistance would be required for the safe movement of a particular AIL. If the haulier decides to undertake the movement without that escort or assistance, they are liable to prosecution if road offences are committed.

8.3.12 Whilst there is little collected data, it is the Constabulary’s observation that the professionalism of many AIL hauliers and the mechanisms surrounding the management of the movement of AILs help to minimise the incidents on the network involving AILs. There were no reported collisions on the A14/A12/B1122 corridor during the six-year period, however, without active intervention from the Constabulary, the effect on the network of a large increase in the number of AILs and other associated HGV increases would significantly impact the safe operation of the network.

Network Risks

8.3.13 The access corridors to the main works site are taken as:

Early years (2023)

- From the south: A14 – Freight Management Facility (FMF) – A12(south) – B1122
- From the north: A12 (north) – B1122

Peak construction (2028)

- From the south: A14 – FMF – A12 (south + Two Villages’ Bypass) – Sizewell Link Road (SLR) – B1122
- From the north: A12 (north) – B1122 – link to SLR – SLR

8.3.14 The road network in east Suffolk has evolved from an historic network and as such the A12 and B1122 have resulted in sections of narrow roads through

²⁴ ‘The Road Vehicles (Construction and Use) Regulations 1986’, Source: <https://www.legislation.gov.uk/uksi/1986/1078/contents/made>

²⁵ ‘The Road Vehicles (Authorised Weight) Regulations 1998’, Source: <https://www.legislation.gov.uk/uksi/1998/3111/contents/made>

villages and hamlets, with tight corners and few passing places along long stretches of the route.

8.3.15 Between Marlesford and Stratford St Andrew the A12 has a 3.5-kilometre section with continuous central double white lines. That section of the route has a flowing undulating alignment and slower moving HGVs and AILS would quickly generate tailing traffic which would be unable to pass unless directed by the Police.

8.3.16 The A12 through Little Glemham, Farnham and Stratford St Andrew is challenging because of its narrow width and tight turns. The following pictures were taken while a 4.5m wide AIL passed through Farnham and Little Glemham and was required to cross the system of solid central lines to navigate between the constraints. Other points along the corridor require some high or wide loads to adjust their alignment to negotiate around street furniture and roadside vegetation. The images in Farnham and Stratford St Andrew illustrate the significant challenges for long and wide HGVs passing along the A12 southern corridor and through the villages. The Two Villages' Bypass, proposed by the Applicant, will assist with mitigating some of the corridor constraints through those villages.

8.3.17 The A12 at Little Glemham features a system of solid double white lines and whilst each lane is about 3.5m wide (the northbound is marginally narrower), loads over 3.0m struggle not to cross the central lines. This issue is exacerbated where existing vegetation and street furniture require high sided HGVs to move towards the centre of the carriageway.

Plates 1 and 2: Escorted AIL crosses double white line through Little Glemham & Farnham



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Plates 3 and 4: Standard maximum C&U HGVs cross the central median through Farnham



Plates 4 and 5: Standard width and length HGVs sit just within double white line system at Little Glemham



- 8.3.18 Another area of concern is the approach and turn into the B1122 at Yoxford. Whilst the road is not especially narrow, the available forward visibility makes this right turn hazardous for any long vehicles or a heavy HGV or AIL. The uphill contested right turn into Yoxford Road is immediately followed by a left-hand curve, which together reduce the speed of vehicles entering Yoxford Road and increases the propensity for incidents involving slow moving HGVs and AILs at this point as they leave A12. AILs under Police escort would be able to maintain momentum and the turn into Yoxford Road where the escorting vehicles are able to protect the junction in advance.

Plates 6-9: A12 / B1122 junction configuration and AIL's position on A12 approaches



- 8.3.19 The Yoxford Road level crossing is protected by a system of double white lines to guard against overtaking through the crossing and identify the crossing. Network Rail requires that AILs and large vehicles notify them when they are crossing and leaving the railway. Network Rail should similarly be notified of AILs with gross weights or axle loading which could damage the crossing. The Constabulary understands that this crossing can accommodate AILs up to and including Special Orders.

Plate 10: AIL directed to cross the railway at Yoxford on B1122



8.3.20 The B1122 is not wide enough in places safely to accommodate an AIL and HGV coming from opposite directions and may struggle to accommodate two HGVs on opposite lanes. This issue is amplified where sections on the B1122 are on embankments on one or both sides of the road, making evasive movements of HGVs or AILs more dangerous.

8.3.21 Complementing the growth at Felixstowe and the increased traffic loadings on the Copdock A14/A12 interchange, Highways England is continuing to pursue an upgrade to the junction with funding from the port infrastructure fund and the third road investment strategy (RIS3). A decision on funding is anticipated and Highways England is expected to progress the scheme as a priority. These construction works are not reflected in the TA, as they are not yet committed, but they will need to be configured and managed to allow for the significant upturn in the number of HGVs and AILs through the works. Depending on the configuration of the traffic management this could introduce new constraints to the movement of larger C&U HGVs and AILs.

Emergency Services Response Reliability and Times

8.3.22 The A12 corridor is a primary response route for the emergency services within Suffolk. The services are accustomed to the challenges on the route which include delays due to sections of congestion at peak periods and with traffic build up behind slower moving traffic such as HGVs, agricultural vehicles and AILs. The increased density of HGVs and AILs on the corridor as a consequence of the construction of SZC will impact on response reliability and times.

AIL Escorting

8.3.23 Adherence to the escort guidance (or direction in the case of a Police escort) is of paramount importance for the safety of all road users. Since AILs are large

and often slow moving, it may be determined that Police presence may be necessary to deter dangerous driver behaviours and to direct traffic where AILs are unable to comply with signed road regulations. Given the restricted widths in some sections of the A12 and B1122, it is the Constabulary's opinion that the frequent numbers of large AILs on those corridors could induce significant driver delays and frustration and bring about poor driver discipline. It has therefore been determined that there is a greater need for Police presence to protect all road users and minimise delay and disruption to the network. This is especially important to manage the network when AILs meet other large vehicles, including buses and agricultural vehicles, in the opposing lane.

- 8.3.24 The Applicant has previously proposed in its consultation material that all AILs should be escorted by the Police. Conversely the agreed strategy adopted at HPC was for AILs over 4.6m to be escorted. The Applicant has subsequently revised its opinion and is now not proposing that all AILs would be escorted by the Police. The Constabulary's matrix reflects these points and the experience of escorting along the A12 and B1122 such that the Constabulary's position is now to require all AILs over 4.4m to be escorted along the A12 and all AILs over 2.9m along the B1122 during the period of construction of SZC. The Constabulary's welcomes on-going dialogue with the Applicant in order that the appropriate solution for AIL movements, ensuring safety for all road users, can be sought.
- 8.3.25 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day (*EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021*). These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.
- 8.3.26 It is acknowledged that some AILs would not necessarily or typically require escorting from the A14 dual carriageway and on dual carriageway sections of A12. The Constabulary is aware that there are currently no suitable meeting places along the A12 where an AIL convoy could meet a Police escort unit. The Applicant has undertaken to review this position. If a suitable location to meet AILs can be established prior to Woodbridge then it would be possible to reduce the distance over which the Police escort should be required. For AILs travelling south from Lowestoft the strategy would be that escorted vehicles would be met at the port, subject to the Applicant's confirmation of the strategy to move AILs from Lowestoft. Under the co-ordination and guidance of a Police escort, if necessary, two AIL vehicles could travel in convoy along the access route in a single convoy helping to enhance the number of AILs that can access the works. This type of operation is more practicable under Police escort but smaller AILs could also travel in convoy under private escort.
- 8.3.27 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL

movements requiring police escort during the SZC construction period. Additional resources are therefore required, in the form of a dedicated AIL Unit, to allow the Constabulary to facilitate the proposed construction period for SZC and associated passage of AILs along Suffolk's road network in an efficient and safe manner.

9 Mitigation and Monitoring

9.1 Local Policing

Summary of Resourcing Requirements

9.1.1 Based on the modelling in Section 6 above, Table 9.1 below summarises the likely population-based impacts of the construction workforce on policing services, expressed in terms of incident numbers and the FTEs required to handle this uplift.

Table 9.1: Summary of Population Based Community Safety and Policing Impacts

Construction Year	Local Policing		Custody		CCR		CCC	
	Incidents	FTEs	Incidents	FTEs	Incidents	FTEs	Incidents	FTEs
1	216	4	35	1	543	1	78	1
2	307	5	53	1	716	1	103	1
3	487	8	89	1	1,060	1	152	1
4	638	10	118	1	1,343	1	192	1
5	860	14	163	2	1,768	1	252	1
6	975	15	185	2	1,986	1	283	1
7	1,102	17	210	2	2,227	2	317	2
8	925	15	175	2	1,890	1	269	1
9	586	9	108	1	1,248	1	178	1
10	283	5	48	1	671	1	96	1
11	226	4	37	1	565	1	81	1
12	175	3	27	1	347	1	67	1

9.1.2 These net additional police resourcing demands need to be adequately mitigated. To achieve this, the Constabulary proposes to apply the NPCC standard officer cost rate to the predicted Local Policing FTE impacts. This rate includes provision for the associated back-office functions which support local policing, meaning it will account for the anticipated increase in Custody, CCR and CCC services without specific additional mitigation needing to be secured for those policing areas.

Police Estate Requirements

9.1.3 To be effective officers need to be based in the community, integrated with the Constabulary's existing resources (e.g. SNT and NRT) and available across all shift patterns. Additional resourcing in specialist roles outside of Local Policing ('Beat') teams will also be required to address the net additional policing demand generated by the SZC project.

9.1.4 Due to the current policing model adopted by the Constabulary, which is predicated on current demand requirements across the area covered by the Leiston SNT and NRT, core day-to-day SNT and NRT policing resources for Leiston are housed within Halesworth. There is no significant police estate

footprint within Leiston, the only presence being a drop-in centre for surgery appointments within the fire station.

- 9.1.5 Through the modelling conducted by the Constabulary, based on the Applicant's gravity model and figures provided within the DCO re NHB workforce and the makeup of the SZC workforce, the forecasted increase in demand for crime and incidents will necessitate a revision of the current estate's footprint within Leiston to allow for the housing of the resources required to address increased local policing demand during the SZC build programme. Based on the Gravity Model, as the centre of activity will be focused on Leiston it is logical that this additional estate requirement is located within the Leiston area and so facilitates the additional policing needs of the existing and emerging communities during the building of SZC.

Estates Footprint Within Leiston

- 9.1.6 It is important that any additional estates requirement reflects where the uplift in additional resources is needed, and where practicable those additional officers are within that community and available for their needs when addressing the increase in demand pertaining to SZC during the build programme. **Therefore, the Constabulary will seek an estate footprint within Leiston to maximise the operational effectiveness and efficiency of additional resources funded by the Applicant. This approach will also make it clear to the local community that the additional resources funded through the mitigation provided by the Applicant are indeed there to address net additional community safety risks resulting from the SZC project.**
- 9.1.7 The provision of the enhanced police estate during the building of SZC will send a clear message to the community that the Constabulary and the Applicant recognise the impact of SZC and are taking proactive steps to ensure that any increase in demand on police services is being addressed, at a local level and that the core uplift in additional police resources will be based within their community.
- 9.1.8 It is recognised by the Constabulary that any additional estates requirement for the housing of the uplift in police resources required during the building of SZC, will no longer be required once SZC has been built. Therefore, the Constabulary has sought to reflect this through a temporary solution and use of a portacabin solution, the Constabulary will not seek the costlier solution of a permanent build which will be surplus to requirement once the building of SZC has been completed.
- 9.1.9 A suitable location for a temporary police facility has been identified within the curtilage of the Leiston Sports and Social Club. The rationale for this location is that:
- The overt location of the facility will reaffirm the key message that the additional police resources within the community, as a result of mitigation provided through SZC, are there for the community and so located within the community.

- The Sport and Social Club has adequate space and parking to house the premises that will be used by the uplift in SNT and NRT resources, so reducing costs.
- The strategic location provides prime access to the existing and emerging community for the uplift in SNT and NRT officers

9.1.10 Anticipated costs to set up a temporary build complex within Leiston for uplift in officers, the facility could house circa eight resources and allow for SNT and NRT to operate from the premises:

Table 9.2: Estates Resources Required

Item	Cost
Temp Building supply delivery and Installation at likely time of order	£100,000
Groundworks	£25,000
Utilities connections	
o Sewage treatment plant	£10,000
o Soakaway	£5,000
o Water connection	£5,000
o Electricity	£10,000
Legal, lease arrangements etc	£5,000
Contingency	£5,000
Total	£165,000*

**All costs subject to final quotes and index linked to reflect inflationary rises.*

Estates Footprint Within SZC

9.1.11 The Constabulary has gone to lengths to clearly voice the opinion that the emerging community from the SZC workforce are likely to be both victims and perpetrators of crime, and therefore need to be treated like any other member of the community. However, as with the established community policed by the Constabulary, the emerging community of the SZC workforce are also provided with a police presence within their community i.e. onsite at SZC.

9.1.12 As with the additional police resources at HPC, secure accommodation should be provided on the SZC site for the additional members of the SNT. So where appropriate the Constabulary can work from the SZC site and provide surgeries for those from the SZC workforce that have need to engage with the police. The onsite accommodation would need to be secured to police estates standards, details can be provided, and house X officers and their appropriate requirements for equipment (again the specification of these can be provided). In addition to the accommodation, reserved parking for two police vehicles will be required on the SZC site and within close proximity of the police accommodation.

9.1.13 The provision of the enhanced police presence within the Leiston Community and uplift in estate, and that on the SZC site, will provide the Applicant's workers with the opportunity to engage with the Constabulary off site or on site (depending on the nature and sensitivity of the topic being discussed).

Summary

9.1.14 The estates solution proposed for the uplift in policing required as a result of SZC, takes into consideration the needs of the existing community and emerging community from the SZC workforce. Affording a cost-effective temporary solution.

9.1.15 The Estates team within the Constabulary will be available to work with the Applicant when delivering these solutions, and so ensure that specifications of the facilities are as per the standards required for premises used by the Constabulary.

Operational Delivery

9.1.16 Policing across Suffolk, its nine Localities, and 18 SNTs relies on several different functions – ranging from ‘day-to-day’ policing to specialist services. These functions work together and support each other to keep communities safe. The location of and numbers of officers in each of these functions is determined through the analysis of demand, threat, and geography.

9.1.17 Resources cannot be taken from other Localities and SNTs to mitigate additional demand arising from the SZC project. To effectively manage the increased demand that has been modelled by the Constabulary additional officers will be required in the SNT and NRT that covers Leiston.

9.1.18 Leiston does not have a dedicated policing response. Its SNT is shared between some 35 parishes and its five response teams cover the wider locality comprising of Leiston, Halesworth and Eye. These resources would not be able to manage the additional demand forecast.

Dedicated Resources for the Leiston SNT

9.1.19 The Constabulary is fully aware of the ‘Beat Team’ approach at Hinkley Point C. The term ‘Beat Team’ and SNT are in all respects the same; a small, resolute team that is based within a community addressing issues at a local level.

9.1.20 The Constabulary has maintained throughout its planning work for SZC that it supports the addition of resources into the Leiston SNT and that the additional resource funded by SZC would be dedicated and focussed to Leiston and the surrounding parishes in line with the greatest demands as per the SZC gravity model.

9.1.21 This addition to the Leiston SNT will be to provide local, non-response, policing both to SZC and to the local community that will be impacted on by the construction. This is the reason the Constabulary has maintained its position that this team should be based within Leiston and not within the SZC site itself. Any additional resource is to police the community not to act as a security function for SZC.

9.1.22 Whilst we would expect to see the greatest additional demand on policing and closely around Leiston it is entirely foreseeable that demand will reach out

beyond this area and will need the additional resource to be able to manage this.

Additional Resources for the Neighbourhood Response Team

9.1.23 In addition to SNT policing resources there is a need to increase resource into the NRT that polices the Leiston area. An SNT team is not resourced nor equipped to provide response policing though they would be expected to respond to immediate threats where they are able to do so. The appropriate response vehicles and response trained drivers are predominantly with NRTs and not in SNTs. SNTs do not work 24/7 365 days a year whereas NRTs do.

9.1.24 As stated above the shift pattern for NRTs within Suffolk is a five-shift pattern, this therefore would require additional resource into each of the five teams. The abstraction rate, discussed in Section 2.4 above, means that for every three additional resources only two will be available on any one day, on average.

Monitoring

9.1.25 Robust monitoring of the SZC workforce, predicted community safety impacts attributable directly or indirectly to the SZC project, and of the effectiveness of deployed mitigation needs to be secured through the terms of any DCO granted and then implemented. This is essential to ensure the continued avoidance of likely significant adverse effects, as any changes in the SZC construction workforce (size or HB/NHB composition) from the levels currently predicted by the Applicant are likely to result in changes to community safety and policing impacts, thus also changes to resourcing requirements, in real time.

9.1.26 The Constabulary supports the establishment of a SZC Community Safety Working Group (CSWG) and expects to play a key role in it. However, the group's terms of reference outlined within the Applicant's Draft Section 106 Agreement need to be extended to include an explicit reference to monitoring both evidenced effects and the effectiveness of deployed mitigation, with the CSWG having the flexibility to determine and agree any required changes to community safety mitigation during the build period to ensure such mitigation remains proportionate, adequate, effective and appropriate.

Contingency for Additional Potential Community Safety Risks

9.1.27 Section 4 of this PIA has identified both *likely* community safety impacts which need to be mitigated through adequate additional local and roads policing resources, and a range of additional potential risks where upfront resourcing requirements cannot be quantified but adequate contingency arrangements instead need to be provided through the Public Services Resilience Fund (i.e. Section 106 Agreement) to allow the Constabulary to address these additional community safety risks should they materialise. For the avoidance of doubt, the required contingency funding for potential additional risks is additional to the 'base level' of additional resourcing needed to address likely local policing impacts from the SZC NHB workforce and roads policing impacts from the movement of substantial volumes of AILs on Suffolk's roads as discussed above.

Summary of Required Local Policing Resources

9.1.28 Table 9.3 overleaf shows how the FTE resources required will be distributed over the SNT and NRTs responsible for policing. This takes account of shift patterns, leave and training requirements. Key points include:

- Ability to manage demand related to site and off-site matters.
- Visible presence within the immediate SZC and Leiston area.
- Building the dedicated SZC team early to deal with investigations, SORF reports, liaison with site.
- To minimise costs (for the Applicant), no proposed uplift in Sergeants as the Constabulary proposes to absorb the additional demand of providing supervision through using existing NRT Sergeants. In the event that an additional Sergeant is required to provide dedicated supervision for the police resources funded by the Applicant, this would result in a higher resourcing cost for the Applicant.
- NRT officer uplift will be allocated to the NRT teams. NRT has 5 teams in total. The NRT teams work a shift pattern that follows the following: 2 early shifts, 2 late shifts, 2-night shifts, 4 days off. The total officers allocated (column 4) will be split across those 5 teams (shown in red).
- Years 3, 5 and 9 have NRT officer allocation numbers that don't fully align across five teams. This will mean some NRTs will have slightly different team numbers. This will affect the officer numbers highlighted in the maximum uplift columns. If the team with no allocated officer is on duty, the total staffing will be slightly less (shown in orange).
- Norfolk and Suffolk Constabularies work to a 30% abstraction rate. Whilst the table below provides maximum figures, absence due to sickness, training and annual leave will reduce staffing levels.

Suffolk Constabulary SZC DCO Written Representation
Part 2 – Policing Impact Assessment

Table 9.3: Summary of resourcing strategy

Allocation			Shift Patterns			NRT resources broken down into teams (shows the total on duty at any given time)					Maximum uplift on duty			
Year	Police Assets	SNT (Dedicated to SZC))	Response	SNT		NRT	NRT1	NRT2	NRT3	NRT4	NRT5	Early	Late	Night
				Early	Late									
1	2	2	0	1	1	NRT Pattern 24/7	0	0	0	0	0	1	1	0
2	4	*4	0	3	1		0	0	0	0	0	3	1	0
3	7	*4	3	3	1		1	1	1	0	0	4	2	1
4	9	*4	5	3	1		1	1	1	1	1	4	2	1
5	13	*4	9	3	1		2	2	2	2	1	5	3	2
6	15	*5	10	3	2		2	2	2	2	2	5	4	2
7	17	*7	10	4	3		2	2	2	2	2	6	5	2
8	14	*4	10	3	1		2	2	2	2	2	5	3	2
9	8	*4	4	3	1		1	1	1	1	0	4	2	1
10	3	*3	0	2	1		0	0	0	0	0	2	1	0
11	2	2	0	1	1		0	0	0	0	0	1	1	0
12	1	1	0	1	0		0	0	0	0	0	1	0	0

9.2 Roads Policing

Resourcing Requirements

- 9.2.1 Escorting AILs is resource intensive for the Constabulary. The Roads Policing team ('RAPT') is a joint team shared between Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled impact the operational number of RAPT officers who can be rostered for normal duties²⁶.
- 9.2.2 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The size of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Table 9.4 shows the number of movements that could be escorted depending upon the size of the team.

Table 9.4: AIL Team Resourcing Model

Size of Team	No. of AIL Movements
1 x Sergeant 8 x PCs 1 x Support Officer	Up to 2 Fully Escorted AIL movements OR 8 'Easy Rider' escorts per day (based on a recognised standard shift pattern)
1 x Sergeant 12 x PCs 1 x Support Officer	Up to 3 Fully Escorted AIL movements and 2 appropriately scheduled 'Easy Rider' escorts OR 12 'Easy Rider' escorts per day (based on a recognised standard shift pattern)
2 x Sergeants 16 x PCs 1 x Support Officer	Up to 3 Fully Escorted AIL movements and 5 appropriately scheduled 'Easy Rider' escorts OR 14 'Easy Rider' escorts per day (based on a recognised standard shift pattern)

- 9.2.3 Table 9.4 illustrates the AIL movements feasible with different dedicated AIL team models. The AIL team agreed with the Applicant that they will need to consider the number of AIL movements required and the Applicant's acceptance in the delay of these movements if the team is not of an appropriate size.
- 9.2.4 The Applicant should confirm to the Constabulary when the SZC requirements exceed the data provided, or the Applicant feels that the requirements could potentially be higher than that expressed in the DCO. The size of team will need to allow the Constabulary to resource demand peaks and to provide support to the mitigation required when addressing the additional roads policing cover that will be needed for the additional traffic on the network resulting from the construction of SZC. When officers in the AIL team are not required for escort duties, they will carry out enhanced high visibility patrols, driver, and vehicle safety tests, attend collisions and monitor the vehicles for speeding or

²⁶ Police Regulations state that changes to shift patterns require 30 days' notice and that police officers should have at least 11 hours rest between shifts

dangerous driving on those roads and key arteries that will be used by the Applicant and their suppliers. Such proactive work will help address the increased demand created by SZC construction traffic and make the road network safer by reducing the risk of collisions and costly delays. Although RAPT is a joint team, the proposed SZC AIL team will be a Suffolk only resource focussing on the demand generated by SZC and proactive traffic management.

- 9.2.5 As per the SZC Local Policing Impact Assessment submitted to the Applicant in November 2020, the NPCC standard officer cost rate will be applied to calculate the mitigation payable to the Constabulary to cover the total additional police resourcing required per annum to mitigate the road policing impacts of SZC. As this rate accounts for both ‘per officer’ and support resources, the Constabulary intends to only apply the rate to the predicted requirement for additional RAPT FTE officers, with no additional costs charged for Custody and CCR FTE resources. For the avoidance of doubt, this assessment does still identify a clear need for additional Custody and CCR resourcing, which will be met through the total level of mitigation provided using the NPCC standard officer cost rate. It should also be noted that police officers are only recruited in whole posts.

Proposed Approach

- 9.2.6 It is the policy of the Constabulary to only move AILs during daylight hours due to the increased risk of moving AILs by night. As such it is proposed that the AIL team works a shift pattern which optimises the number of AIL movements within national policy guidance and that of the Constabulary.
- 9.2.7 It must be stressed that the size of the AIL team will be driven by data provided by the Applicant. It should also be noted that Police Regulations mean that officer shifts can only be changed with 90 days’ notice. Therefore, quality of data provided by the Applicant and effective timely communication are very important. Where the number of AILs requiring movement is above that modelled by the Constabulary, based on the data provided by the Applicant, and the capacity of the dedicated AIL resource will be insufficient to manage this. In this case the movements will be managed through existing roads policing resources and scheduling with all other AIL requirements.
- 9.2.8 The increased number of AILs and HGVs on the network will require more detailed co-ordination and collaboration with the existing the Abnormal Loads Officer who will continue to manage the “business as usual” movements but with additional pressure on roads management and timings to avoid conflicts. This will require scrutiny of the submissions made with an uplift in quality of submissions and more advanced notice to allow for resource planning and adherence to proposed movement dates.
- 9.2.9 The co-ordinated system will need to be able to flex to changes in programme or short notice. This could require temporary adjustments in the resources to assist with planning for major movements which might require extra management e.g. at peak periods with high numbers of AILs/day or with extra wide / long loads where more intervention is required.

- 9.2.10 AIL movements would continue only to be permitted in accordance with the hours set out in the current Policy. The Constabulary would be prepared to review this position subject to further analysis of traffic patterns along the access corridor. This might reflect the demonstration of peak period spreading as a consequence of new commuting patterns or during holiday periods.
- 9.2.11 The strategy would need to be flexible to adapt to operational challenges that might occur during the life of the construction process. Those operational challenges would be managed through a strengthened and detailed Traffic Incident Management Plan concluded through the DCO process. The plan would need to reflect the use of the FMF and P&R sites and how they would assist with the operation of HGV and AIL traffic during incidents.
- 9.2.12 The management and co-ordination of the process would be monitored and reviewed through the Transport Working Group and would require the Constabulary to be represented on that group.
- 9.2.13 The Constabulary is also prepared to reflect on the evidence from the operation of the proposed resource schedule and to consider reducing the dedicated resources if it is shown that the project no longer requires that level of resource. The Applicant must understand that replacing that reduced resource would be the subject of further negotiations and suitable funding. That revised position would require mobilisation time.

Summary

- 9.2.14 The Constabulary has concluded that the implications of the governance and management of the AILs associated with the construction of the SZC project will require significant dedicated resources and resilience within that resource. That resource will be able to assist the Applicant in the efficient delivery of the Project whilst helping to achieve safe and efficient operation of the affected road network.
- 9.2.15 As demonstrated through this WR, the escorting of AILs is resource intensive for the police. It means the abstraction of multiple officers from their usual duties or those officers working overtime. Any increase in the number of AILs requiring police escorts will place considerable strain upon the Constabulary resources. Even if costs for staff used are recouped, due to the abstraction of officers and the implications of overtime on work rosters in accordance with the Government's 'Working Time Directive, there is not capacity within RAPT to address the increase in demand from SZC. Failure to resource to the appropriate levels will adversely impact upon the efficient movement of AILs and will affect the safety of the Suffolk road network. In view of the volume of AIL movements pertaining to SZC there is not existing capacity within the Constabulary to manage this demand.
- 9.2.16 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The construct of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Should the number of AILs exceed the agreed numbers modelled, the Constabulary could not facilitate those movements and those movements could

be delayed whilst waiting for capacity in the RAPT team to move an AIL. This additional movement will then be charged to the Applicant at the standard rate applied to AIL movements. The Constabulary would prefer to work with the Applicant to create the appropriate structure, resources and processes so as to minimise any delays to the safe and efficient operation of the road network and the construction of the SZC project.

9.2.17 The Constabulary has interrogated the AIL data provided by the Applicant from HPC for the period 01/01/2017 – 31/03/2020. It is proposed that the next step is for the number and sizes of predicted AILs to be agreed for SZC (daily, monthly and yearly) and therefore the size of the dedicated AIL team required to facilitate this number of movements. This strategic approach is being presented in pursuit of establishing an SoCG between the Applicant and the Constabulary and recognising the funding needed to cover the additional resources and to recognise the need for the Constabulary representation on the Transport Working Group.

9.2.18 The Applicant has provided a response to the Constabulary on the points raised in a Roads Policing Paper which considers the Road Policing impacts. That response has been received too close to the deadline for WR submissions to allow the Constabulary to prepare a robust reply and for that reply to be taken through the proper governance processes of the Constabulary. A reply to the Applicant's response will be prepared for subsequent evidence to the Examination and to reflect in the on-going engagement with the Applicant and the preparation of a SoCG.

Appendix A Refinements made to Suffolk Constabulary PIA following discussions with the Applicant

- A.1.1 This Policing Impact Assessment (PIA) is underpinned by a model which the Constabulary has developed to predict likely local policing demands and associated resourcing requirements based on non-home based (NHB) workforce data provided by the Applicant and baseline demographic conditions within Suffolk. The Constabulary has engaged with the Applicant over a period of 24 months to develop and refine the PIA.
- A.1.2 This appendix outlines refinements made to the model throughout its development to accommodate requests from the Applicant. These include:
- **Resourcing workforce benchmark:** the Constabulary has a long-established practice of undertaking resource planning at the predicted peak requirement of planned events to ensure sufficient police resourcing is in place to address predicted peak community safety impacts.
- A.1.3 Following discussions with the Applicant and detailed resource demand modelling using NHB monthly figures (EDF, July 2020), the Constabulary has developed an approach which accommodates the Applicant's request that the annual average NHB workforce is used to calculate impacts. The approach is underpinned by use of the National Police Chiefs Council (NPCC) standard officer cost rate.
- **Recruitment periods:** as a police force which recruits cohorts of officers at the same time, the Constabulary has limited flexibility over recruitment to respond to month-to-month changes in demand arising from the changing NHB workforce. This was originally factored into the model through one recruiting period a year for additional resourcing.
- A.1.4 Following discussions with the Applicant, the Constabulary has now modelled two recruitment periods in the year.
- **Whole post resourcing:** related to the above and in accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.
- A.1.5 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.

- A.1.6 Finally, the model originally included an allowance for additional community safety risks that could occur and, if so, *would* require additional resourcing, in addition to likely significant effects that are predicted and *will* require additional resourcing.
- A.1.7 Following discussions with the Applicant, these have been removed from the Constabulary's base model. Monitoring and contingency to mitigate the additional community safety risks should now be provided as necessary through the Applicant's Community Safety / Public Services Resilience Fund rather than upfront resource funding direct to the Constabulary.
- A.1.8 This change has been facilitated by refining the structure of the model to predict policing demand and resourcing arising from SZC more accurately, including peak months, which is now based on 6-month average demand.

Appendix B Comparison Maps

B.1.1 Figure B.1 plots the location of Hinkley Point C and Sizewell C against the rural urban classification of Avon and Somerset and Suffolk, respectively.²⁷

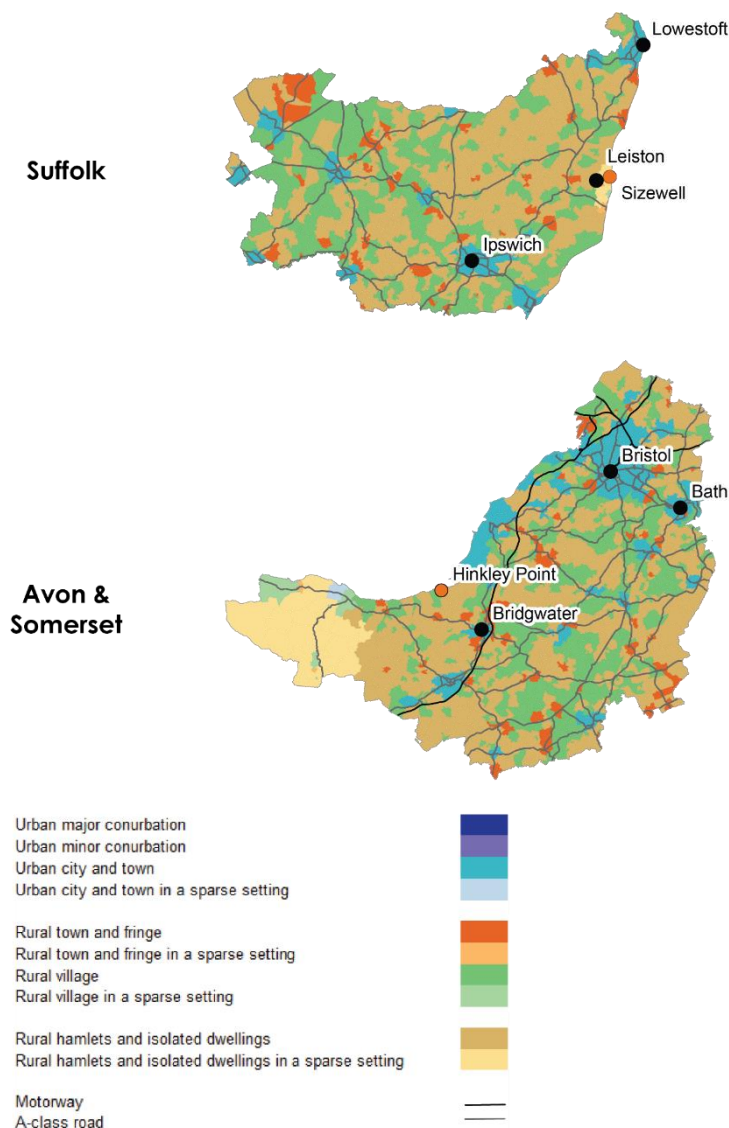


Figure B.1: Comparison Map

²⁷ The Rural Urban Classification is an Official Statistic generated by the Office of National Statistics (ONS) to distinguish rural and urban areas. The Classification defines areas as rural if they are outside settlements with more than 10,000 resident population. Output areas may cover a large area of open countryside and yet be still urban if most of the population lives in an urban settlement. Rural is a matter of settlement form and dwelling density rather than the economic function or the character or use of the land. Most local authorities classed as rural will include urban populations and vice versa. The classification is not an indication of the amount of open countryside but on the settlements where the populations live.

Appendix C SEAG Crime Classifications and Resource Allocation

SEAG Crime Classifications	Initial response (After CCR)	Department Responsible for continued investigation	Examples of where this could affect policing resources outside of SZC Beat Team.
Criminal Damage	SNT/NRT	SNT/NRT	Damage caused within the accommodation, site or wider community.
Drugs	SNT/NRT/Pro-active Team	SNT/NRT/Pro-active Team	Drugs used for recreational use off site, in particular around Night Time Economy (NTE).
Assault	SNT/NRT	Depends on the level of Injury <ul style="list-style-type: none"> • Common Assault – SNT/NRT • Actual Bodily Harm – SNT/NRT • Grievous Bodily Harm - CID 	Violence used by or directed at workers on and off site, including domestic abuse, NTE and off-site tensions. (A&S had an incident at their campus which involved wider non-funded resources to break up)
DA	NRT	Depends on the nature of the incident(s) <ul style="list-style-type: none"> • NRT will investigate the majority of the incidents • CID may investigate the higher risk DA 	Suffolk's policy is to take positive action around all DA related matters. Due to the threat and risk DA imposes, NRT would ordinarily be dispatched to attend near on all DA matters. This will include crimes/non-crimes with family and any intermate partners (regardless of the time spent within the relationship).
Harassment	SNT/NRT	Depends on the level and circumstances of harassment (includes stalking) <ul style="list-style-type: none"> • SNT/NRT will investigate harassment • SNT/NRT will investigate harassment/stalking (Sec2A) with CID oversight • CID will investigate harassment/stalking (Sec4a). 	Any reports of harassment will be taken seriously. Any reports of harassment on site may well be investigated by the SZC team, any off-site reports may well be investigated by other units. Specialist trained officers may well be required to help with complicated electronic related lines of enquiry.
Public Order	SNT/NRT/CID	SNT/NRT will investigate lower level public Order (Affray, Sec4 and 5) CID will investigate anything more serious (Affray/Violent disorder and Riot)	Public Order incidents can occur anywhere in public, but could be more prevalent in the evenings linked to NTE. Alcohol could be a contributing factor.

SEAG Crime Classifications	Initial response (After CCR)	Department Responsible for continued investigation	Examples of where this could affect policing resources outside of SZC Beat Team.
Theft	SNT/NRT	SNT/NRT will investigate unless this is linked to another related crime.	Theft is very likely to be reported on site. Units wider than the SZC team could also be tasked with investigating theft reported off site.
Sexual Offences	SNT/NRT/Safeguarding Unit (SIU)	SNT/NRT will investigate sexual touching SIU will investigate the more serious sexual assaults	Sexual offences will require a fast response, specialist units and possibly require a number of resources to undertake specific early actions. Safeguarding will always investigate sexual offences unless the offence relates to a sexual touching.
Rape	SNT/NRT/Safeguarding Unit (SIU)	SIU only	Rape will only be dealt with by the safeguarding investigation unit. This may require a large number of resources to undertake early actions.
Road Rage	SNT/NRT (although this is not a crime classification and would be covered under another heading...Assault/Public order)	SNT/NRT	Arguments/violence related to traffic issues is very likely due to the increase in traffic.
Drink Driving	NRT/Roads Policing	NRT/Roads Policing	Drink driving can occur at all times of the day, but is more of a concern in the evening.
Robbery	NRT	CID only	NRT officers will be asked to attend initially (if reported at the time) but the investigation would be managed by CID.
Drunk and Disorderly	NRT	NRT	This would be allocated to a response officer for an early resolution. This could be related to NTE disorder in and around town centres.
Breach of the Peace	NRT	NRT	This can occur at all times of the day and may require a number of officers depending on the circumstances.
Disorder / Threats	As per Public Order	As per Public Order Any threats to Kill would be investigated by NRT or CID (based on circumstances)	Public Order incidents can occur anywhere in public, but could be more prevalent in the evenings linked to NTE. Alcohol could be a contributing factor. Any threats are dealt with quickly and would require an urgent response. This is likely to be managed through wider resources.
Hate Crime	SNT/NRT	This can relate to an assault/public order/criminal damage.	The SZC workforce is expected to consist of a diverse workforce. Reports of hate crime is very likely and will either be managed through the SZC team or wider resources available.

C.1.1 The above table highlights the following key points:

- Any reported incident to the Constabulary will be assessed within the control room and graded based upon the THRIVE principle (Threat, Harm, Risk, Investigation, Vulnerability, Engagement).
- Any urgent response will require the Neighbourhood Response Team (NRT) to attend. (Grade A and B). The Safer Neighbourhood Team will not normally be asked to attend urgent incidents, unless NRT require support.
- The majority of the crime / non-crime categories within the A&S SEAG returns would require NRT assistance should they be reported in Suffolk.
- There will be various crimes which will be investigated by other specialist departments. The majority of the time, these incidents are first responded to by NRT to mitigate any threat, safeguard the victim and preserve evidence early. Therefore, even though some of the crime will be allocated to the beat team or transferred to specialist units the initial actions are conducted by local policing units.
- The incidents reported into the A&S SEAG show that investment is required within the NRT. The beat team cannot deal with a large proportion of the incoming demand due to staffing numbers, limitation of hours, limitation of skills/knowledge/experience and limitations of the role profile.
- The crime categories used in the A&S SEAG are very general and broad. They do not break the crime category down into subcategories which would then provide the detail to show which department is investigating.

Appendix D Example of Need for Resources outside HPC Beat Team

- D.1.1 One example of both the limitations of relying on automatic tagging to attribute incidents and the need for specialist policing resources to address additional demand arising from HPC outside of the funded HPC 'Beat Team' relates to a recent operation conducted by Avon and Somerset Police to address reports of careless and dangerous driving on the C128 (main route to HPC main development site).
- D.1.2 As a result of complaints received by Avon and Somerset Police via different channels (social media/local officers/phone calls) from the local community in and around Cannington, the issue of careless and dangerous driving was identified as a sustained and significant policing issue that required a targeted approach. Due to the volume of complaints received by Avon and Somerset Police, this resulted in the deployment of data capture boxes to support the anecdotal evidence. The complaints and data, having been reviewed by staff who are responsible for generating specific intelligence led taskings, corroborated the issue was of a substantial nature that warranted resource allocation for a targeted approach from policing resources.
- D.1.3 Due to the nature of the issue that needed to be addressed, and so specialist training required from officers, the tasking generated was for Roads Policing Units (RPU). Through the RPU targeted action on the C128, two days focused on specific time periods within these days, the following were issued:
- 10 x excess speed fixed penalty notices (highest being 90mph in a 40)
 - 5 x double white line overtakes
 - 1 x revoked licence
 - 12 x notice of intended prosecution (unable to safely stop vehicle, but registration captured)
- D.1.4 Whilst the above figures are from the two specific periods targeted by the RPU, it needs to be remembered that in order for this issue to have been tasked targeted in the manner that it was, there had to have been significant activity prior to have warranted the targeting by the RPU team.
- D.1.5 The link between this operation and the HPC workforce (as the main perpetrators of the activity targeted on the C128) is evidenced by a strongly worded communication (Figure D.1) released by the Applicant shortly after the RPU operation.

HPC HEALTH, SAFETY & ENVIRONMENT
FLASH ALERT

Unsafe and Antisocial Driving by HPC Workforce on the C182

Following complaints from the residents of Cannington and reports of unsafe driving by personnel from HPC, the Avon and Somerset Road Policing Team recently carried out operations to stop vehicles identified committing driving offences. **Among six people clocked for speeding was one driver doing 90mph in a 40mph zone, and one going at 60mph through a village in a 30mph area. There were also a number of solid white line overtakes.** The Police are also following up on a number of vehicles they were unable to stop at the time when they were dealing with those already stopped. The Police will continue with similar operations on the C182 in the future.

During March 2021, there were two road traffic incidents on the C182 involving vehicles from HPC which in slightly different circumstances could have resulted in life changing or fatal injuries to members of the HPC Project team. **Speed and poor decision making were the root causes in both incidents.**

The majority of road deaths occur on rural roads and driving behaviours must change before one of our team is involved in a fatal road traffic incident. Driving on the C182 and other rural roads can be frustrating due to the large amount of slower moving vehicles moving to and from the project.

All HPC drivers are also reminded that Cannington village is out of bounds to all HPC traffic. Please use the Cannington Bypass.

Key advice for drivers:

- Stay patient and allow extra time for your journey
- Drive to the road and weather conditions
- Be aware of other more vulnerable road users
- Be aware of wild animals that may stray onto the road
- Remember speed limits are not targets. It takes nearly twice as far to stop at 70mph than it does at 50mph
- Never use mobile phones and other hand held devices when driving
- Don't become distracted by your passengers
- Never attempt to overtake on a bend or blind corner
- Be courteous to other road users

Speed is a global issue
Road death is the biggest killer of young people globally.
According to the World Health Organization, speed is responsible for about a third of deaths on the roads in developed countries. In low- and middle-income countries, the proportion is even higher.

RED LEVEL

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ZERO HARM

Figure D.1: HPC Communication regarding unsafe driving

- D.1.6 The communication warns staff of the consequences if caught, and how the worker code of conduct could be applied, therefore the chances of a person being stopped willingly giving their employment as HPC (knowing the potential implications of doing so, due to the HPC Worker Code of Conduct) is highly unlikely.
- D.1.7 Beyond acknowledging that the HPC workforce are key contributors to this issue, the text also identifies two traffic incidents on the C128 involving vehicles from HPC which in slightly different circumstances could have resulted in life changing or fatal injuries.
- D.1.8 This example illustrates the Constabulary's position regarding the need for adequate and appropriate police resourcing mitigation, going beyond an on-site Beat Team, and highlights the weaknesses of relying on tagging calls to groups or areas to capture the totality of policing demands arising from HPC.

Appendix E Literature Review: Factors not Quantified in Crime Modelling

E.1 Employment Status

- E.1.1 Deductive logic may suggest that when unemployment goes up crime is also likely to increase. The idea that unemployment drives crime is a popular one and has its roots in Durkheim's Anomie theory (that poverty leads to disenfranchisement which in turn leads to people rebelling against the law) and Becker's rational choice theory that people commit crime where it is in their benefit to do so. However, modern criminology believes both theories are too simplistic to account for the complexities of real life
- E.1.2 Meta-analysis of academic research shows there is currently no consensus in the academic community (both criminological and economics) as to the relationship between crime and unemployment, with considerable debate around causation, correlation, the role of contributing factors and methodological issues with trying to establish the relationship in the first place.²⁸ For example, Entorf and Sieger's (2014) research in Germany found that while there is some evidence of a correlation between unemployment and certain crime types it is not consistent and is strongly affected by the underlying local crime rate.
- E.1.3 Other research has found similarly mixed results. Ha (2019) used regression analysis of crime and unemployment data between 2005 and 2015 of 23 counties in the UK to look at the relationship between crime and unemployment during the financial crisis. She concluded that *"It is difficult to draw strong conclusions regarding the effect of unemployment on crime as there are many issues with data inconsistency, the lack of data available and omitted factors affecting the level of crime rates"* and that what her data showed is that *"unemployment negatively impacts crime rates i.e. an increase in unemployment causes property crime rates to fall or vice versa, thus showing a negative correlation"*²⁹.
- E.1.4 Similarly, Eli Lehrer's (2000)³⁰ study into crime and the economy showed the historic exceptions that disprove the common assumption that crime and unemployment are linked. Lehrer concluded that removing unemployment from the equation, long term demographic change is the likely reason for a general decline in crime at a national level. Other research has shown most conclusively that crime and age have a strong positive correlation and that men, in particular, tend to 'age' out of crime.
- E.1.5 Similarly, a clear link between unemployment and crime would imply a positive correlation between economic downturns and crime rates – yet here too the link

²⁸ Entorf, H. & Sieger, P. (2014) Does the Link between Unemployment and crime Depend on the Crime Level? A Quantile Regression Approach. Available at: <http://ftp.iza.org/dp8334.pdf>

²⁹ Ha, K. (2019) Analyse the Relationship between Unemployment and Crime. Available at: <file:///C:/Users/victo/AppData/Local/Temp/Ha-eesj-a18.pdf>

³⁰ Lehrer, E. (2000) Crime and the Economy: what connection? Available at: <https://www.heritage.org/crime-and-justice/commentary/crime-and-economy-what-connection>

is complex and unclear. While some studies show a positive correlation between recession and increased crime rates³¹, others show the opposite. Finklea (2011), for example, found that while there was increase in crime during some recessions there was no consistent relationship between US economic recessions and crime rates as during others they remained relatively stable or even decreased. Similar inconsistencies were reported by Dr Bandyopadhyay³² and Dr Rosefield (2014).³³

E.1.6 Meta data analysis shows that there are many factors that affect the relationship between crime and recession, including where and when the recession took place, crime types used in the correlation, the nature of the recession and changes in the way that society lives. This is supported by the findings of the UNODC comparative study³⁴ which found that in 8 of the 15 countries studied there was a correlation between the economic crisis of 2008/9 and changes in the rate of some crime types. Violent property crime such as robbery were most affected with up to two-fold increases during the recession. Rises in homicides and motor vehicle theft were also observed. This is in line with the ‘criminal motivation theory’ that suggests economic stress may encourage illicit behaviour. In 7 of the 15 countries, however, no correlation was found.

E.1.7 Academic research shows that the relationship between recession and crime is not straightforward. A recession as a result of the COVID-19 crisis it is likely to bring unique challenges and circumstances and is unlikely to be comparable to previous recessions. Consequently, crime trends may not follow patterns seen during previous recessions. Economist Bruce Weinberg makes a valid point that “people sitting in their houses don’t make great targets for crime. People going out spending cash and hanging out in big crowds do.”³⁵ Three successive lockdowns between April 2020 and April 2021 are likely to have a damaging effect on both the economy (short term and long term) and on people’s mental and physical wellbeing. Initial indications during the first lockdown was that crime had decreased significantly. However, as soon as the lockdown was lifted crime levels started rapidly increasing to and surpassing usual seasonal levels. The socio-economic changes caused by the pandemic are likely to take years to settle and will need to be handled carefully when undertaking long term analysis in the future.

E.2 Fear of Crime

E.2.1 Fear of crime (FoC) is a social phenomenon and one that has gained a lot of focus in both the academic community and policing circles in recent years. Studies into fear of crime show three key things 1) that FoC is contagious (i.e. social interaction is the mechanism through which fear is shared and communicated); 2) that FoC is related to perception not objective reality; and 3)

³¹ United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)

³² Bandyopadhyay, S (2018) The Paradox of Falling Crime Rates during a Recession

<https://www.birmingham.ac.uk/research/perspective/falling-crime-rates-siddhartha-bandyopadhyay-2.aspx>

³³ Rosefield, R (2014), Crime and the great Recession. Journal of Contemporary Criminal Justice, Vol. 30 (1) 4-6

³⁴ United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)

³⁵ Mikula, M (2020) Will the COVID-19-related economic recession cause a spike in crime?

that FoC is disproportionately felt by those who are least at risk but who perceive themselves as having a vulnerability (e.g. disability, age or gender)³⁶.

E.2.2 A study by University College London conducted in 2017 found that when individuals that never suffer crime only interact with people from their own group, they feel secure. However, only a small amount of interactions between groups is enough to change their perceptions of security. For instance, when 5% of the interactions occur with people from another group, the model predicts that more than 50% of the individuals who never suffer crime will fear it. Interestingly, the study showed that a decrease in crime rates has almost no effect on the perception of security. The researchers concluded that the perception that a region is secure is very unstable. It takes only a small amount of crime to create a generalised fear in the population, and crime rates need to decrease considerably and over an extended period to improve the average perception that a region is secure³⁷.

E.2.3 This is supported by research conducted by Professor Innes (2005)³⁸. Innes (2005) argues that some events in the life of a social collective exert considerable influence because of how their presence is interpreted as denoting the potential for other similar or more serious problems to occur in the future. This sense that certain incidents exert a disproportionate impact upon public beliefs and attitudes when compared with their 'objective' consequences, is pivotal in understanding how and why social groups respond in certain ways to dangerous people, places and events. These events are typically called 'signal events' or 'signal crimes'. A signal crime can be understood as "a conventional sign, which, by prearrangement, has been arbitrarily established for this purpose – the purpose of announcing that there is something about which to be alarmed" (Goffman, 1972 cited in Innes 2005). Warr's (1994) research shows that people are disproportionately fearful of crimes such as rape, robbery and burglary compared to the risk of them actually happening. Even moderate increases in the perceived risk of violent victimization have the potential to increase fear enormously³⁹.

E.2.4 Innes (2005) concludes that modern society is characterised by rapid, ongoing and unrelenting social change which has led people to feel connected to each other and less likely to possess a common socio-spatial identity. "The disintegration of these bonds is amplified by the presence of multiple and intersecting forms of insecurity that combine to render any sense of security more fragile. People feel themselves placed in danger by myriad manufactured risks... It is under conditions such as these that signal disorders assume their saliency to people as connotative signifiers of the condition of a local social order. In more stable times, the capacity of less serious issues to trouble people and 'drive' patterns of insecurity is likely to be more limited. But in an era which

³⁶ Prieto Curiel, R., Bishop, S.R. Fear of crime: the impact of different distributions of victimisation. *Palgrave Commun* 4, 46 (2018). <https://doi.org/10.1057/s41599-018-0094-8>

³⁷ <https://www.ucl.ac.uk/news/2017/jul/fear-crime-contagious-even-low-crime-communities>

³⁸ Innes, M (2005), 'Why Disorder Matters? Antisocial Behaviour and Incivility as Signals of Risk'. SCARR Conference January 2005. Available at: <https://www.kent.ac.uk/scarr/events/finalpapers/Innes.pdf>

³⁹ Warr, M. (1994) Public Perceptions and Reactions to Violent Offending and Victimization. In National Research Council *Understanding and Preventing Violence, Volume 4: Consequences and Control*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/4422>.

is, in part, as a result of threats to national security in the form of terrorist attacks and neighbourhood security in the forms of crime and anti-social behaviour... people are... particularly sensitive to and attuned to those events that might indicate a risk of potential harm. As such disorder at a local level becomes a connotative signifier capturing the risks and threats posed by a whole world of trouble". The more rapid the change, the higher the level of generalised anxiety it generates in the wider community. As such, even minor changes in the community can increase levels of insecurity. This is particularly important to note given the proposed changes that will arise from the Sizewell C development and the community concerns already reported. The victimology profile of Suffolk shows that young men between the ages of 20 and 49 are at greater risk of victimisation, particularly with regard to serious violent offences such as ABH, GBH and Robbery. This age group are also the most likely to be involved in alcohol related offences. Given the above, managing the increased social anxiety will be a long term demand on police resources in the area as any perceived increase in problems are likely to generate a disproportionate response from the factions within the local, and wider, community and thus require a more visible police response.

Appendix F Existing Demand for Police Services

F.1 Local Policing

Criminal Investigations

Suffolk

F.1.1 As shown in Figure F.1, in 2019 there were 56,331 crimes recorded by Suffolk Constabulary. This represents a 3% increase from the number of criminal investigations recorded in 2018 and an increase of 28% from 2016.

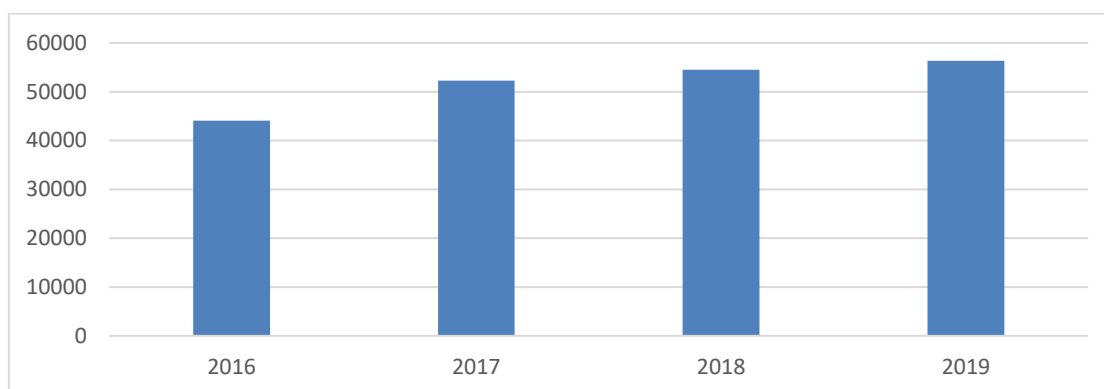


Figure F.1: Recorded Crime Investigations 2016 - 19

F.1.2 This increase is largely due to a rise in the number of public order offences, sexual offences and violent crimes recorded. Between 2017 and 2018 there was a 31% increase in Robbery, 20% rise in Possession of Weapons, 14% increase in Violence against the Person and 12% increase in Public Order and Sexual Offences. The apparent increase is consistent with the national trend identified by the ONS (2018) and is expected to continue growing⁴⁰.

⁴⁰ Crime in England and Wales: Year ending June 2018 available at:
<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingjune2018#latest-figures>

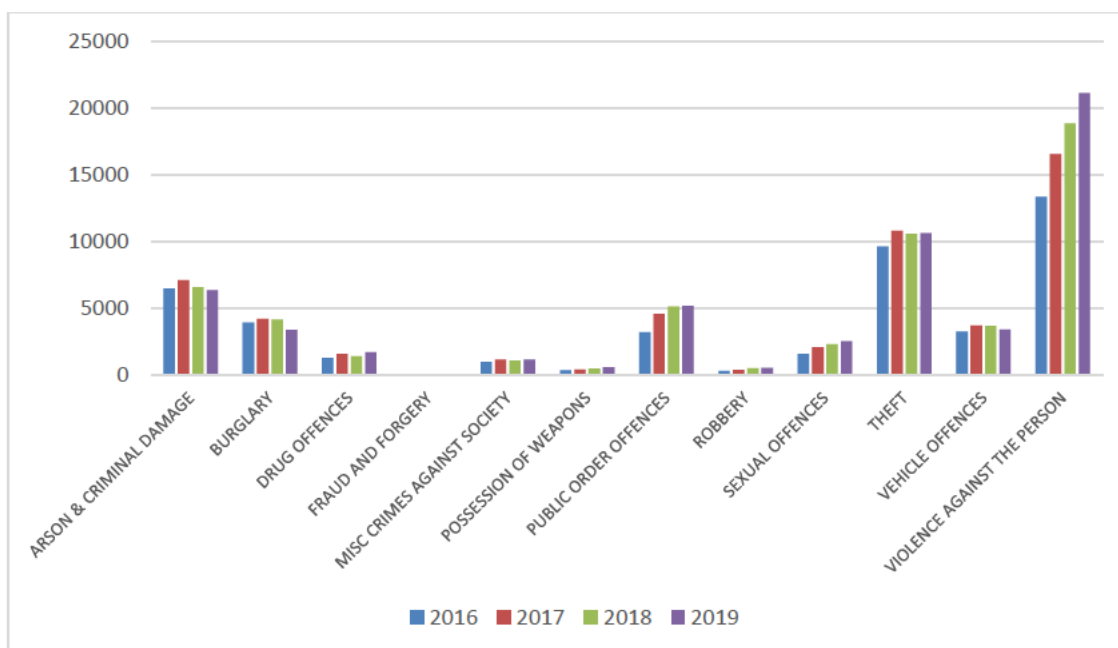


Figure F.2: Demand by Crime Type

- F.1.3 Increases in recorded crime place more demand on limited resources. The crime type will also have a bearing on the likely period of the investigation; For example, sexual offences take longer to investigate and involve multiple departments (CID, SNT, SIU and SARC) whereas a theft from shop is less resource intensive and is usually resolved by the initial attending officer.
- F.1.4 As Figure F.2 above shows, certain offence groups occur more frequently than others. Violence against the person accounted for a significant proportion (38%) of the total number of criminal investigations during 2019. Offences ranged from common assault to GBH. The suspect profile for VWI offences is predominantly male and between the ages of 18 – 55⁴¹.
- F.1.5 There is an important distinction between the frequency of offences and level of harm caused by certain offences. Sexual offences, for example, are far less frequent than theft or vehicular offences and yet the harm caused to both the victim and wider society is much greater. Any increase in high harm categories then, has a much greater impact both on society and the police in terms of long-term resource allocation.
- F.1.6 As Figure F.3 below shows, the increase noted in Figure F.2 is part of a long-term trend and is consistent with the national picture⁴². Based on current projections, reported crime will continue to increase.

⁴¹ <https://www.croydon.gov.uk/sites/default/files/Strategic%20Assessment%202019.pdf>

⁴² ONS (2018) <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice>

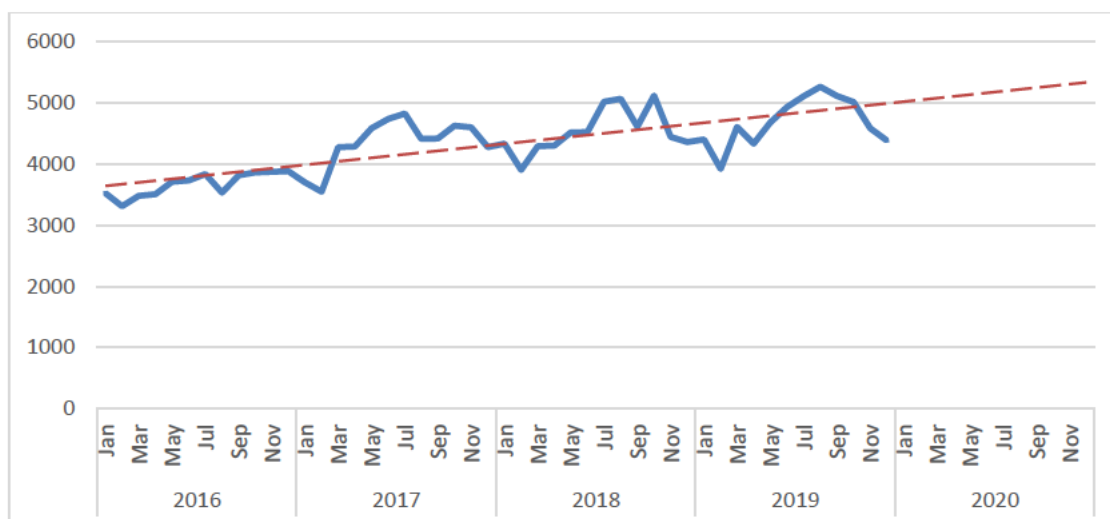


Figure F.3: Five Year Crime Trend

F.1.7 There is some evidence of seasonal variation in demand on local policing services. As Figure F.4 below shows there is an increase in the number of crimes reported between July and October, and a decrease between December and February. This is consistent with the trend shown in the CCR data.

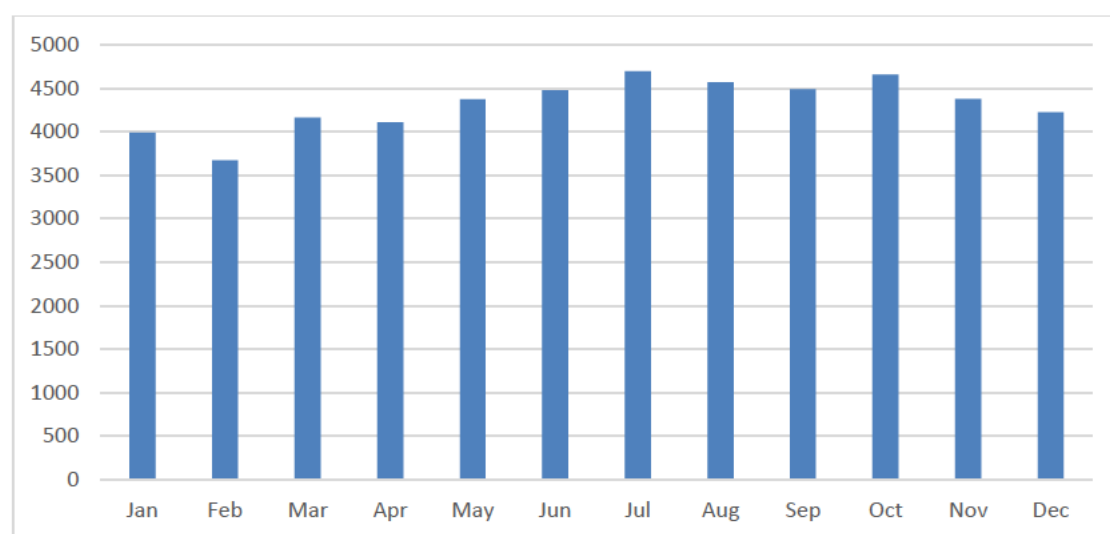


Figure F.4: Seasonal Variation Three Year Average (2016/19)

- F.1.8 Demand on policing can come from a number of different areas: from reports of crime, to proactive operations and to education and prevention advice and activities, to name but a few. Police resourcing (i.e. staffing) is allocated based on the identification of demand trends.
- F.1.9 Overall demand on police resources is relatively stable across the week although there is a noticeable difference in the type of demand. Peak demand for when crime is committed is over the weekend period (Friday – Sunday), which is consistent with the CCR data. The peak time for reporting crimes is mid-week (Tuesday/Wednesday) with a significant decrease in reporting over the weekend. This is due to the delay in when people report crimes to the police (Figure F.5).

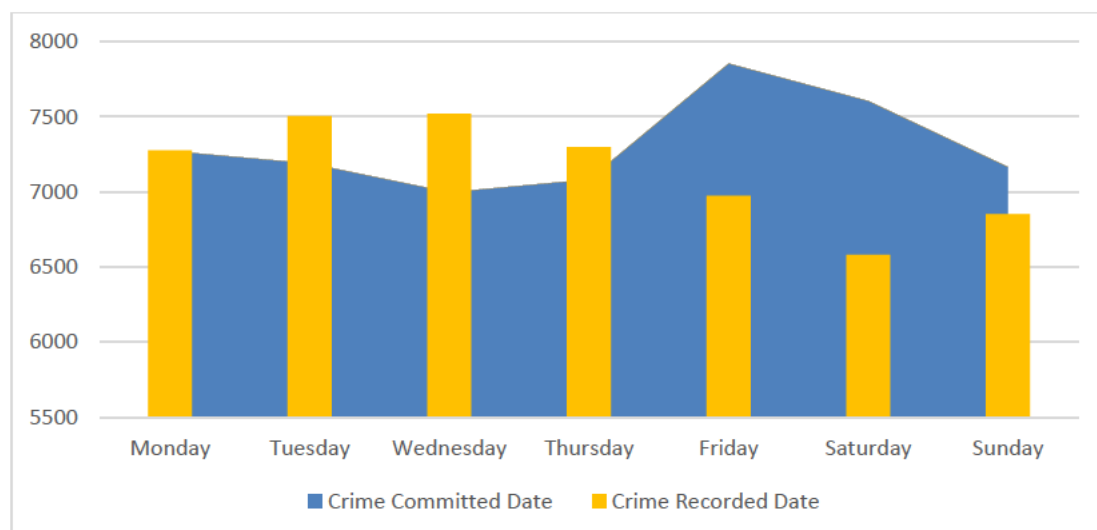


Figure F.5: Demand by Day Three Year Average (2016/18)

East Police Area

F.1.10 In 2019 there were 11,584 criminal investigations recorded in the Eastern Police Area (EPA), accounting for just over 20% of all criminal investigations recorded in Suffolk for that calendar year. The EPA has seen a 25% increase in the number of criminal investigations recorded over the last four years (2016 – 19), which is 3% below the average increase across Suffolk. The largest increase in crime was seen in the West PD, which saw a 33% rise between 2016 – 19 (Figure F.6).

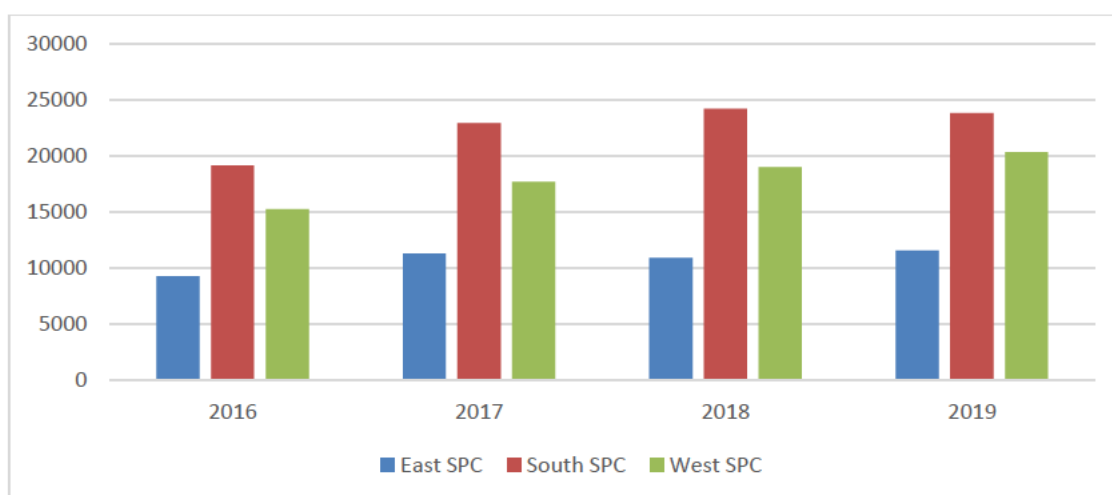


Figure F.6: Demand by Police District

F.1.11 Figure F.7 shows the criminal investigation breakdown for the EPA. In keeping with wider Suffolk trends, violence against the person has the highest volume of offences, followed by theft, Arson/Criminal Damage and Public Order Offences. There are fewer robberies and burglaries recorded in the EPA than

in the West or South but the proportion of VWI offences is greater in comparison to the size of population and overall number of crimes reported⁴³.

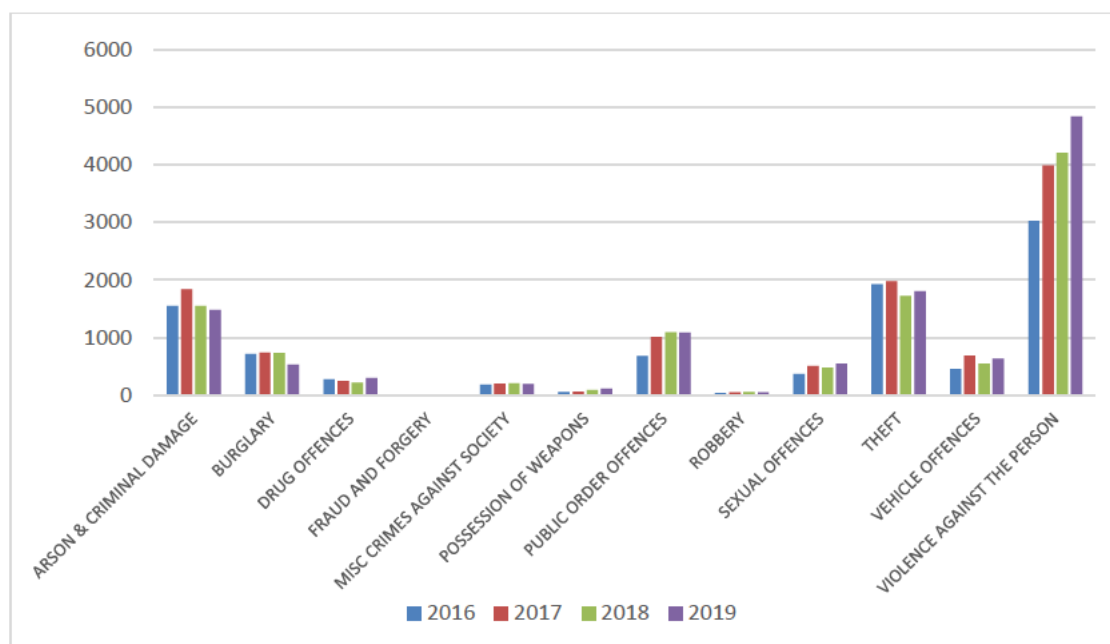


Figure F.7: East SPC Crime Investigation Breakdown

F.1.12 SZC is due to be built near the town of Leiston in East Suffolk. Leiston sits within the Leiston Safer Neighbourhood Team (SNT) and the Halesworth Local Policing Command (LPC). In 2019, there were 1,120 criminal investigations recorded within the Leiston SNT area; accounting for 10% of total number of criminal investigations recorded for Eastern Policing Area that year and 2% of the total for the whole of Suffolk. Between 2016 – 19 Leiston SNT has seen a 22% increase in the number of criminal investigations reported; a slower rate of increase than seen in the Eastern Policing Area or across Suffolk. As Figure F.8 shows, Leiston SNT is not a high demand area at present and is resourced accordingly.

⁴³ 37% of all crimes in the East are VWI (four-year average) compared 35% in the West and 31% in the South.

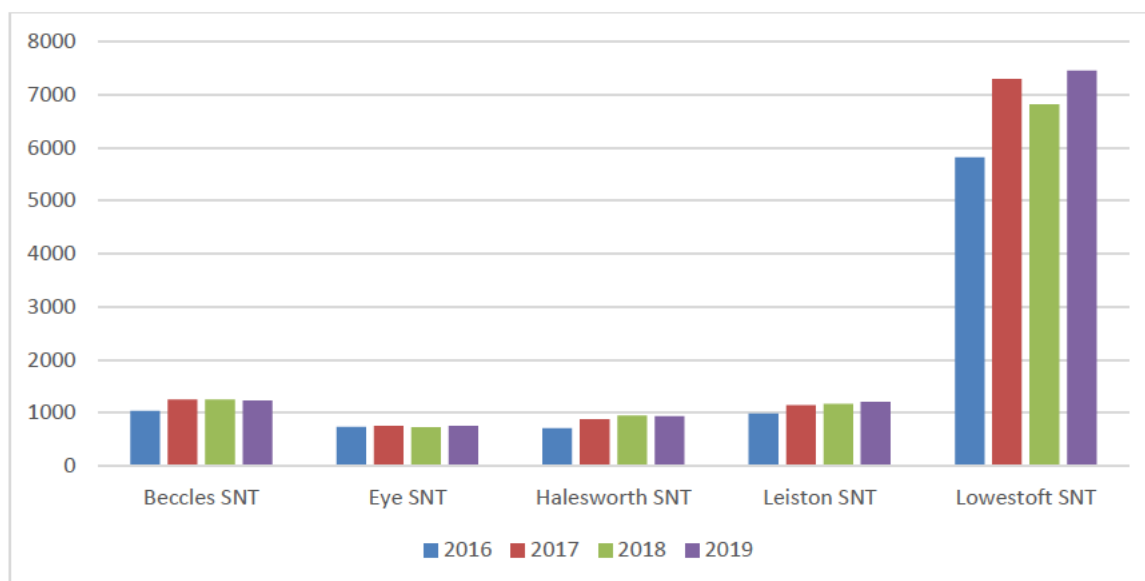


Figure F.8: Criminal Investigation by East SNT

Non-Crime Investigations

Suffolk

F.1.13 In 2019 there were 17,895 non-crimes recorded by Suffolk Constabulary. Between 2016 and 2019 there has been a 6% increase in the number of non-crime investigations recorded (Figure F.9). This is the equivalent of 3 additional non-crimes recorded per day.

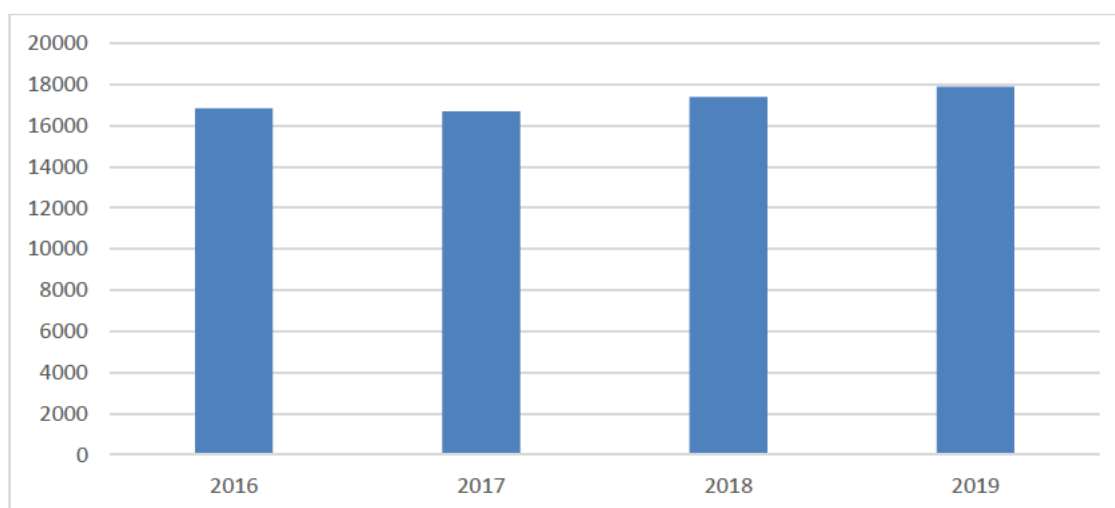


Figure F.9: Non-Crime Investigations Recorded in Suffolk

F.1.14 Adult Protection Investigations, Child Protection Investigations and Domestic Abuse Investigations are the most common types of non-crime investigation. These types of investigation account for a significant proportion of the demand on police resources due to the volume and the time-consuming nature of these investigations which makes them resource intensive (Figure F.10).

Suffolk Constabulary SZC DCO Written Representation
Part 2 – Policing Impact Assessment

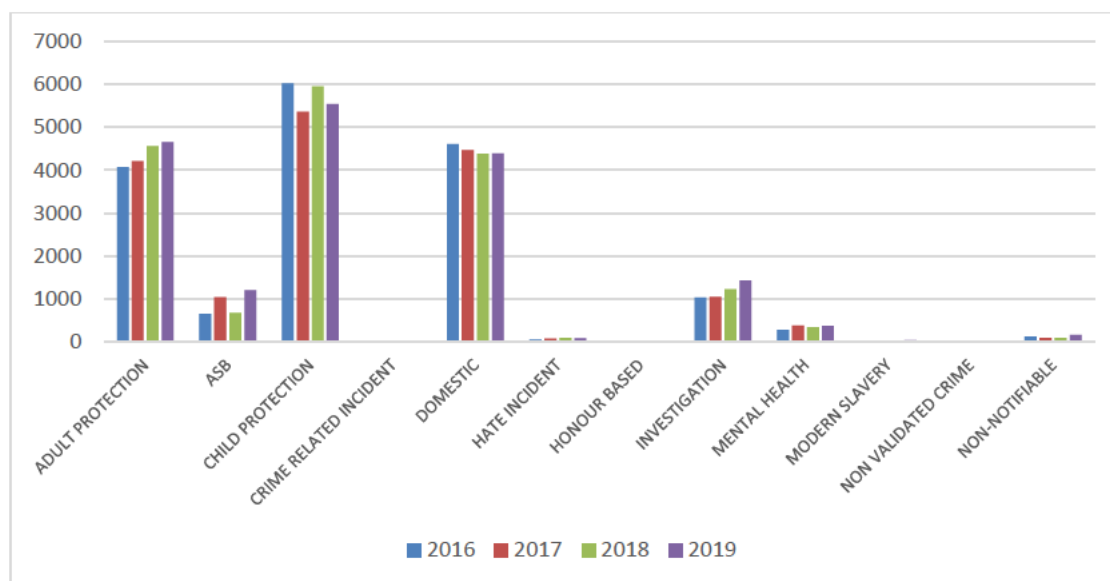


Figure F.10: Demand by Investigation Type

F.1.15 Analysis of the five-year trend suggests that non-crime reporting is increasing (Figure F.11), consistent with the same pattern identified in reporting criminal investigations (see Figure F.3).

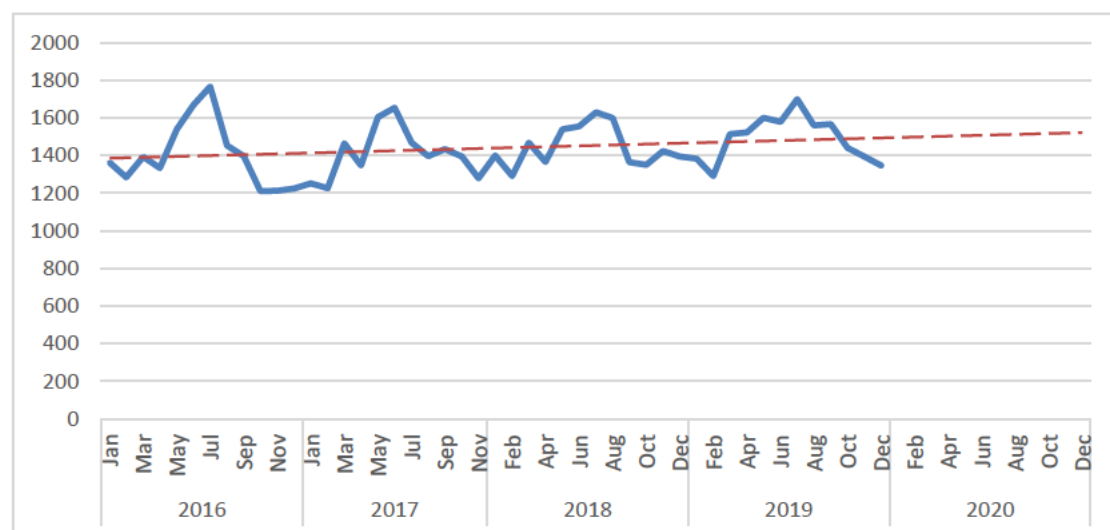


Figure F.11: 5 Year Non-Crime Trend

F.1.16 Certain activities that at first glance may not be seen as a key issue for SZC i.e. SZC workforce impacting on Domestic Abuse as the number of workers relocating their family is deemed as small, does in fact have the potential to be a significant drain on police resources. For example, a DA incident where abuse has taken place between those aged 16 above who are or have been intimate partners or are family members. Partners refers to an established relationship, or a one-night rendezvous that resulted in intimacy. DA will therefore relate to any incident where a member of the Sizewell workforce has become intimate with another person. In any DA related case, positive action will be taken. Meaning arresting those responsible and taking them to custody.

F.1.17 Travel to nearest available PIC takes a minimum of 30 minutes from Leiston and will require two officers. Any rise in DA would have a significant impact on resourcing need to manage the increase, the likelihood of an increase in DA activity from SZC is greater than may have been initially thought.

F.1.18 There is some evidence of seasonal variation. Demand is highest between May and July and lowest between October and December (Figure F.12).

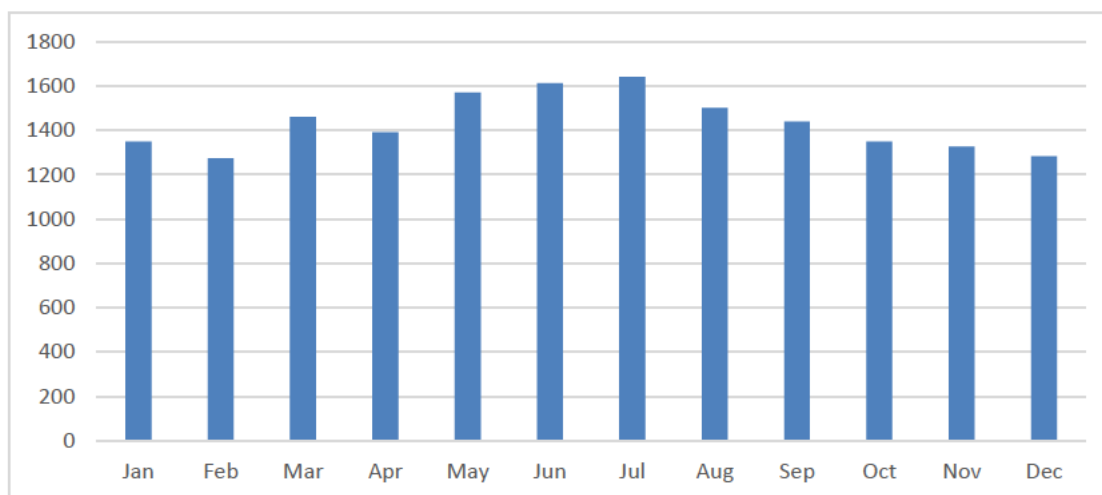


Figure F.12: Seasonal Variation (2016 - 2019)

F.1.19 As discussed in Section 6, demand on policing can come from a number of different areas: from reports of crime, to proactive operations and to education and prevention advice and activities, to name but a few.

F.1.20 Demand is relatively stable across the week. Midweek shows a slightly higher level of recorded offences, with a slight peak on Wednesdays and a noticeable drop in the number of offences recorded over the weekend period.

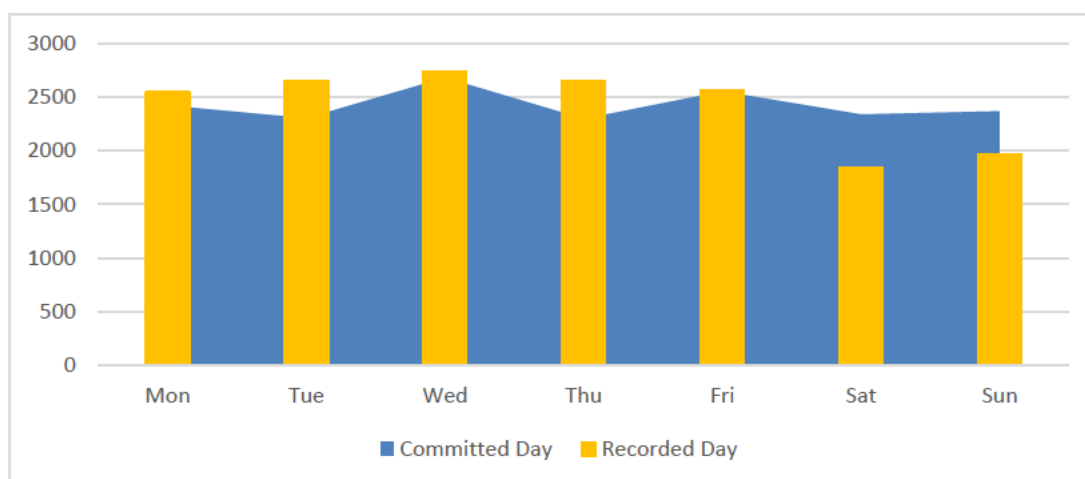


Figure F.13: Demand by Day Three Year Average (2016/18)

East Police Area

F.1.21 In 2019 there were 4,067 non-crime investigations recorded in the East Suffolk Police Area, accounting for 23% of all non-crime investigations reported to Suffolk Constabulary during that calendar year.

F.1.22 As Figure F.14 below shows, the number of non-crime investigations has remained relatively steady across East Suffolk, only minor fluctuations (0.1%) between years. In comparison, non-crime investigations have risen significantly in both the West (3%) and South (13%) Police Area.

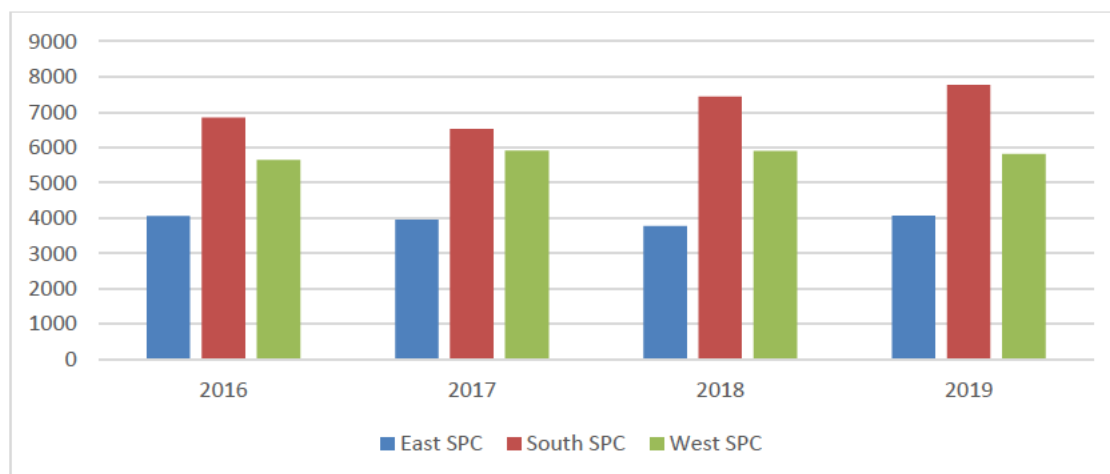


Figure F.14: Non-Crime Demand by Police District

F.1.23 In 2019 there were 518 non-crime investigations recorded within Leiston SNT, a 22% increase from the number recorded in 2018. Leiston SNT accounted for 13% of all non-crime investigations recorded in East Suffolk during 2019 and 3% of the total non-crime investigations by Suffolk Constabulary (Figure F.15). Leiston SNT is a relatively low demand area at present for Suffolk Constabulary, and is resourced accordingly. Any increase therefore in the number of crimes or incidents will have a disproportionate impact on the local community and on the resourcing required due to it presently being such a low demand area.

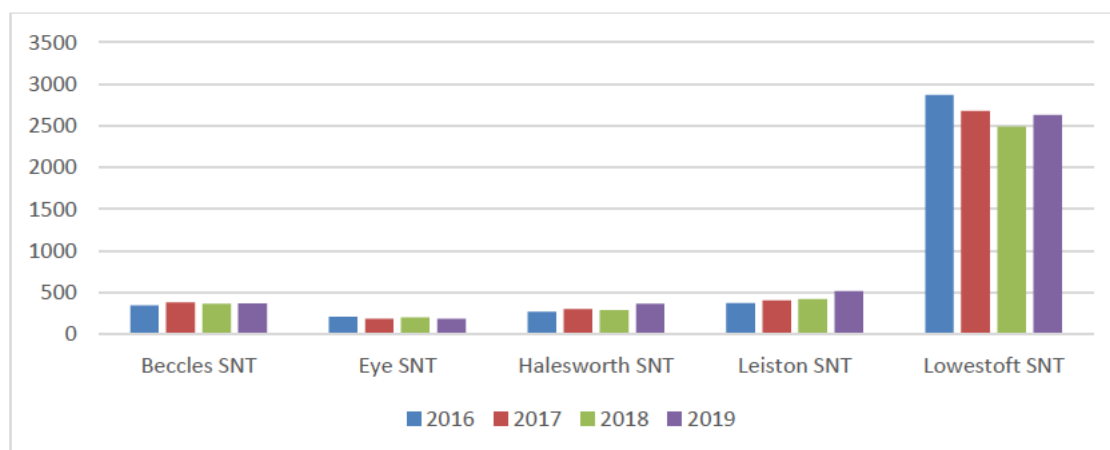


Figure F.15: Non-Crime Investigations by East SNT

Additional Demands on Local Policing

F.1.24 Crime and non-crime investigations are not the only demand on police resources and represent a small part of core police activity. There are five additional key areas which have an impact on police resources: Mental health episodes, suicides, missing person investigations, unmeasured demand and community tensions/liaison. The demand generated by these events are not recorded in the crime or non-crime investigation figures but account for a significant proportion of routine police work.

F.1.25 The next section covers this demand. Where possible data has been provided both at county level and for the East policing area in order to show both the wider impact and more granular effect. Data relating to mental health, missing persons and suicides are only available at a county level, as such no breakdown or impact assessment on East Suffolk has been provided.

Mental Health Calls

F.1.26 The police are regularly called out to attend mental health problems and are often the first responders. This is partly due to the police model which allows for rapid response to any community issue, but also due to the special powers that police officers hold which allow them to detain, where necessary, and transport individuals suffering mental health problems to the nearest available psychiatric facility for assessment. Police officers are also able to force entry into a location if there is concern for the occupant. This is not a power shared with the NHS or other services.

F.1.27 A recent report by the College of Policing estimated that around 20% of police time in the UK involves a mental health concern and that this percentage is increasing year on year⁴⁴. Research suggests it costs police approximately £522 to respond to a mental health incident with costs increasing if the individual is detained under S.136⁴⁵.

F.1.28 In addition to this an HM Inspectorate of Constabulary inspection in 2013 found that it was common for officers to spend up to 8 hours in incidents involving detentions under the Mental Health Act⁴⁶. This represents a considerable proportion of that officer's shift time and can have further consequence on resourcing if it occurs towards the end of that officer's shift – resulting in either another officer diverting to take over care or over time being paid to the original officer to stay past the end of their shift. It should also be noted that it is the Constabulary's policy that individuals detained under S.135 or a S.136 are escorted by a minimum of two officers in order to safeguard the wellbeing of both the individual and the officers. More than two officers can be required if the individual is violent or judged to be high risk. This can have a serious impact

⁴⁴ College of Policing (2015) Estimating Demand on the Police Service

⁴⁵ Heslin, M; Callaghan, L; Barrett, B; Lea, S; Eick, S; Morgan, J; Bolt, M; Thornicroft, G; Healey, A; and Patel A. (2017) Costs of the police service and mental healthcare pathways experienced by individuals with enduring mental health needs. The British Journal of Psychiatry, Feb 210 (2): 157 - 164

⁴⁶ HMIC (2013) A Criminal Use of Police Cells? The use of police custody as a place of safety for people with mental health needs.

on local resourcing as it means multiple officers tied up for a considerable amount of time.

F.1.29 Between 2016 and 2019 there were 19,142 mental health related calls to Suffolk Constabulary. Demand is relatively steady and consistent across the four-year period with an average of 4,786 mental health related calls per year (Figure F.16). In 2019 there were 4,802 mental health calls, the equivalent of one mental health call for every 158 residents in Suffolk.

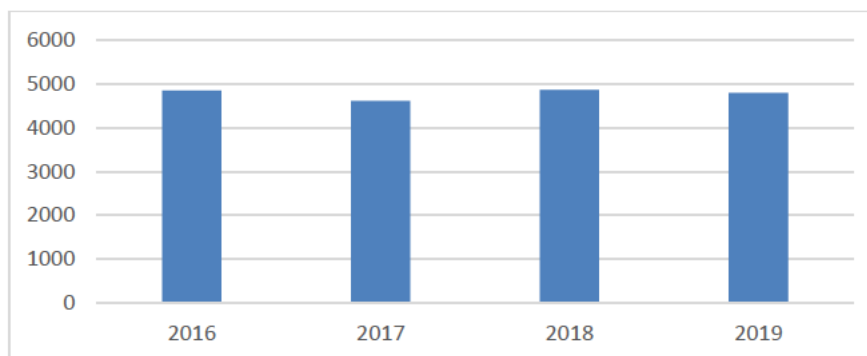


Figure F.16: Number of Mental Health CADs

F.1.30 Police officers in Suffolk attended 2,289 mental health related calls during 2019; just under half (48%) of all mental health calls recorded by the CCR (Figure F.17). Approximately 8% of all mental health calls in 2019 (376 calls) came under either S.135 of the Mental Capacity Act or S.136 of the Mental Health Act and required medical assessment at one of the three acute mental health centres in Suffolk. This equates to over one incident per day for the Constabulary and the equivalent of 3,008 police officer working hours per annum.

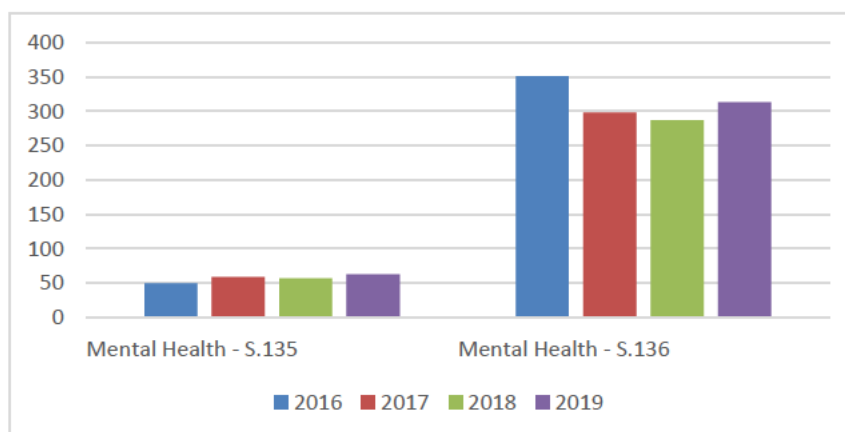


Figure F.17: Police Attended Mental Health Call

F.1.31 Studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average⁴⁷. It is further recognised that the

⁴⁷ Burke, L (2019) Workplace Mental Health in the Construction Industry. <http://constructorscompany.org.uk/wp-content/uploads/2019/05/Mental-Health-In-Construction-May-2019.pdf>

majority of NHB workers will not have their natural support network of friends and family nearby and are therefore more susceptible to the pressures that can lead to mental health issues as the opportunity to talk and confide in others is not as readily available. It should be noted that the predicted SZC workforce demographic are within the high-risk group for mental health and suicide.

Suicides

F.1.32 There were 67 verdicts of suicide recorded in Suffolk in 2018, up from 61 in 2017. The majority of these involved young males⁴⁸.

F.1.33 Analysis by the ONS found that 75% of suicides involved men and that males between 45 – 49 had the highest age specific suicide rate (27.1 deaths per 100,000)⁴⁹. The report concluded that suicide is now the leading cause of death for men aged 15 – 49. Studies show that the majority of those who either take their own life, or attempt to, were in contact with a health professional within 12 months before their death⁵⁰. As with mental health, NHB workers do not have their natural support network of friends and family and are therefore more susceptible to the pressures that can lead to suicide as the opportunity to talk and confide in others is not as readily available.

F.1.34 Other studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average⁵¹. The ONS also report that of the 13,232 in-work suicides recorded between 2011 and 2015 the construction industry accounted for 13.2% of suicides despite only accounting for 7% of employment in the UK⁵².

F.1.35 The above data and independent research support the Constabulary's view that the specific demographic profile of the SZC construction workforce is more susceptible to suicide or attempted suicide than other demographic groups and is consequently likely to create a disproportionate level of police resourcing demand in this area. Notwithstanding the embedded mitigation measures proposed by the Applicant, it is therefore highly likely there will be an increase in suicides, attempted suicides and associated mental health problems during the construction phase of SZC.

F.1.36 Whilst suicides and attempted suicides generate a tremendous emotional toll on families, friends and communities of those who died, suicides also have economic costs for individuals, families, communities, businesses and the emergency services who respond to crisis situations. These include medical costs for individuals/families, lost income for families, lost productivity for employers and the resources required from the emergency services.

⁴⁸ <https://www.eadt.co.uk/news/survivors-of-suicide-in-suffolk-speak-1-6264772>

⁴⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations>

⁵⁰ <https://www.btp.police.uk/pdf/From%20Crisis%20to%20Care%20Website%20Final%20Aug%202016.pdf>

⁵¹ Burke, L (2019) Workplace Mental Health in the Construction Industry. <http://constructorscompany.org.uk/wp-content/uploads/2019/05/Mental-Health-In-Construction-May-2019.pdf>

⁵² <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations>

F.1.37 A study by Knapp, McDaid and Parsonage (2011) estimated that the average cost of suicide was £1,450,000 per case in 2009; with the majority of the cost incurred around disruption to businesses from road and service closures⁵³. Deaths occurring on or near major transport links (such as major roads and railways) can result in the closure of that road or train line for several hours resulting in considerable delays and volume pressure on less suitable roads, which can in turn result in more accidents. ONS data shows that suicide is currently increasing. In 2018 there were 6,507 verdicts of suicide recorded in England, equating to 11.2 deaths per 100,000 population and an increase of 11.8% from 2017⁵⁴.

Missing Person Investigations

F.1.38 Missing Person investigations place great demand on police officers and are one of the most resource intensive types of investigation. Even low risk missing person investigations are resource intensive due to the number of tasks automatically generated for police officers every time a new missing report is submitted. These tasks include risk assessments, obtaining photographs and carrying out searches.

F.1.39 In 2013 a study of UK police forces estimated that the average cost of a medium risk, medium length missing person investigation was around £2,415 for the investigating police force⁵⁵. This amount is approximately three times the cost of investigating a robbery and four times more than burglaries⁵⁶.

F.1.40 Demand on police resources and overall cost depends on two factors in missing person investigations: the risk rating of the missing person and the length of time missing. The higher the risk rating and the longer the person is missing, the greater the higher the cost to police forces in terms of money and manpower.

F.1.41 In 2019 there were 3,587 missing people cases recorded in Suffolk involving 1,569 individuals. The distribution of missing reports is consistent with the population distribution across Suffolk: South Suffolk has the highest number of missing reports and the highest population density while West and East Suffolk have proportionately fewer missing reports (Figure F.18)⁵⁷.

⁵³ Knapp, M. McDaid, M. and Parsonage, M (eds) (2011) Mental Health Promotion and Mental Illness Prevention: The Economic Case. PSSRU. KSE and Political Science.

⁵⁴ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations>

⁵⁵ Greene, K. and Pakes, F. (2013) The Cost of Missing Person Investigations: Implications for current Debates. Oxford University Press.

⁵⁶ UK Missing Persons Bureau

⁵⁷ Data obtained from COMPACT download

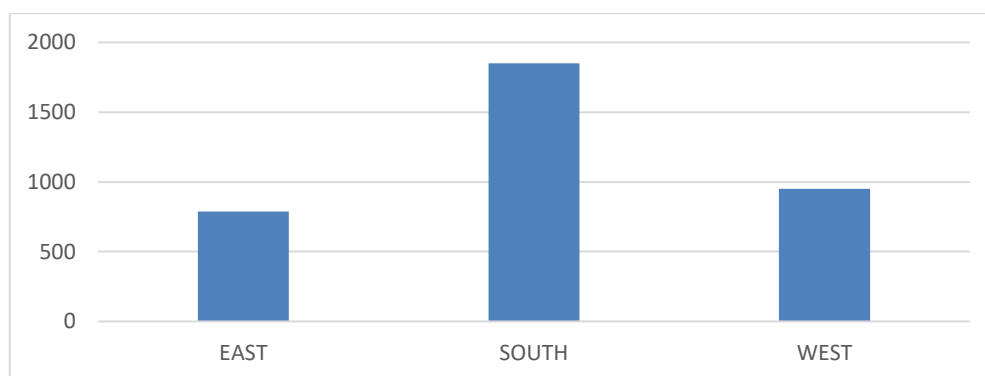


Figure F.18: No. of Missing Person Cases in 2019

F.1.42 In 2019, just under 70% of missing people either returned, or were found, within 24 hours of being reported missing. 95% are found within 7 days of the initial missing report. 5% of missing people investigations take more than a week. In just under a quarter of investigations the missing person was returned by police (Figure F.19).

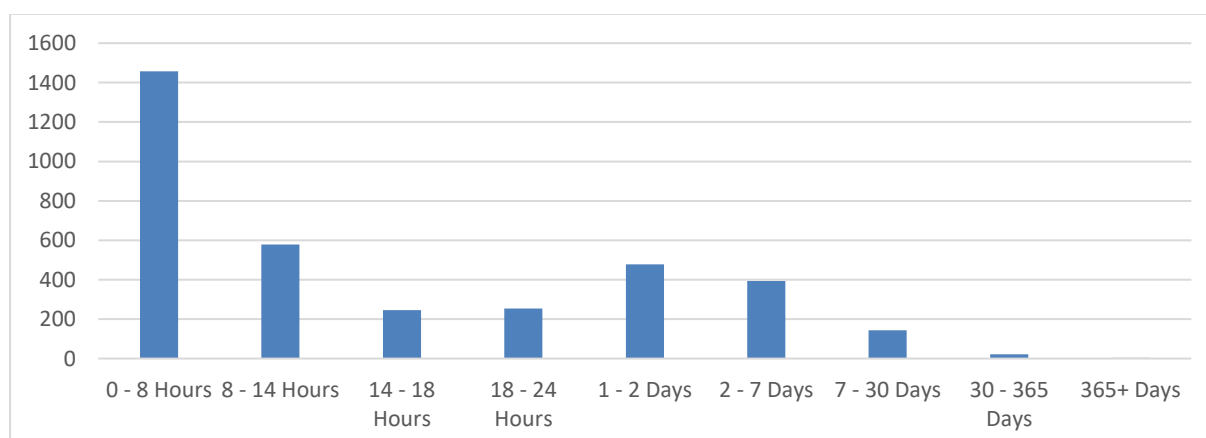


Figure F.19: Average Time Missing

F.1.43 In 2014/15 the Constabulary had the third highest number of high-risk missing person reports of all police forces in England⁵⁸. The majority of investigations in 2019 involved medium or high-risk reports (Figure F.20) with 177 accounts of serious harm to the missing person recorded (Figure F.21). Where an offence had been committed either by or against the missing person this results in a separate criminal investigation that is independent of the missing person investigation. 26% (1021) of missing person reports relate to individuals between the age of 18 and 60 (Figure F.22)⁵⁹.

⁵⁸ UK Missing Person Bureau <https://missingpersons.police.uk/en-gb/resources/research/geographies-of-missing>

⁵⁹ For the purposes of the SC assessment, only cases involving missing people between 18 and 60 have been used in the predictive demand modelling.

Suffolk Constabulary SZC DCO Written Representation
Part 2 – Policing Impact Assessment

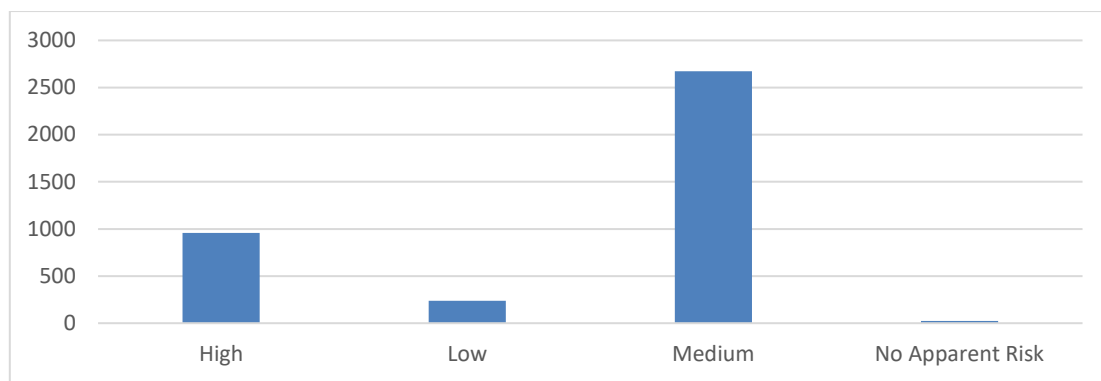


Figure F.20: Missing Person Cases by Risk (2019)

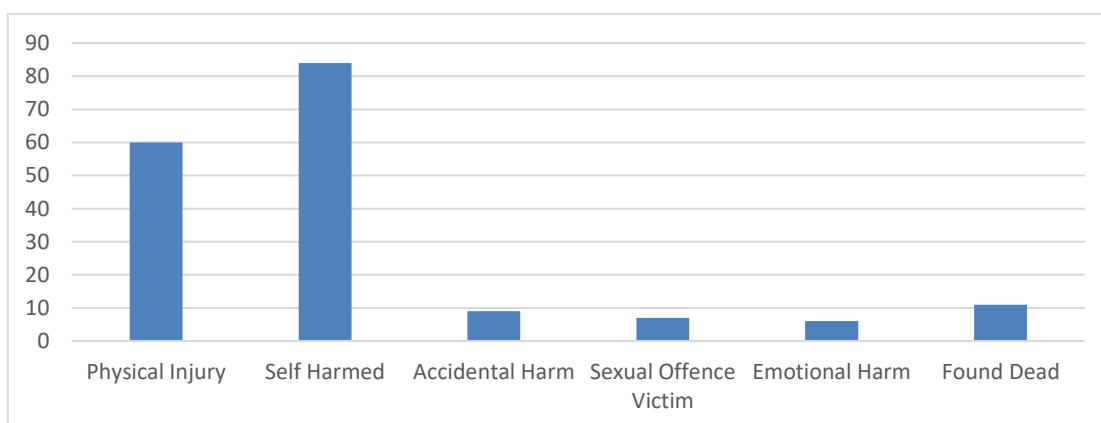


Figure F.21: Harm Reported to Missing Person

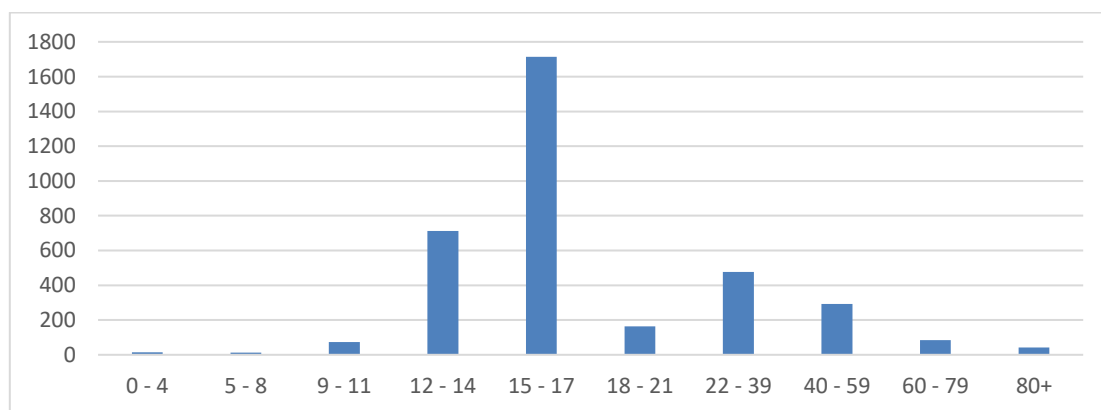


Figure F.22: MPI by Age Group

F.1.44 A recent review by the College of Policing (2015) estimated that 18 hours of police time is required per medium risk missing person investigation⁶⁰. In 2019 there were 2,674 medium risk missing person investigations recorded in Suffolk. Based on the College of Policing calculations this would equate to 51,264 police manhours being devoted to a medium risk missing person investigation and therefore unable to perform or response or other community policing duties⁶¹.

⁶⁰ College of Policing (2015) Estimating Demand on the Police Service

⁶¹ This number excludes all subsequent investigations that might result from a missing person investigation (i.e. where a crime has been committed).

F.1.45 Whilst not always, there is often a link between the three areas of mental health, suicide and missing persons. As previously stated the data and independent research on these areas supports the view that the SZC workforce is within the category that will place a disproportionate demand on policing due to activity within these resource intensive areas of activity.

Community Tensions

F.1.46 It is often those activities that are deemed low level or softer crime types, fly parking, dog fouling, noise from NTE, that prove the flashpoints for community tensions. Unless addressed at the earliest stage of being identified, such areas will manifest themselves as the vehicle for other strains and issues to be voiced and so have the propensity to escalate.

F.1.47 The influx of SZC workforce to the area, are likely to cause such local tensions. These tensions might not all be related to crime and disorder as this could include noise, traffic, culture issues, food supplies in shops, parking spaces etc. If tensions are present, this is likely to have an impact on how quickly people will report issues to the police, and so demand on the Constabulary's resources. When the community feels tension they often feel reassured by an enhanced visible policing presence. The resourcing of such additional visibility will also have to be found from the Constabulary's resources, predominantly from the SNT.

F.2 Custody

Overview

9.2.19 In 2019 there were 10,758 detentions in Suffolk⁶². This represents an increase of 9% between 2016 - 2019 (see Figure F.23).

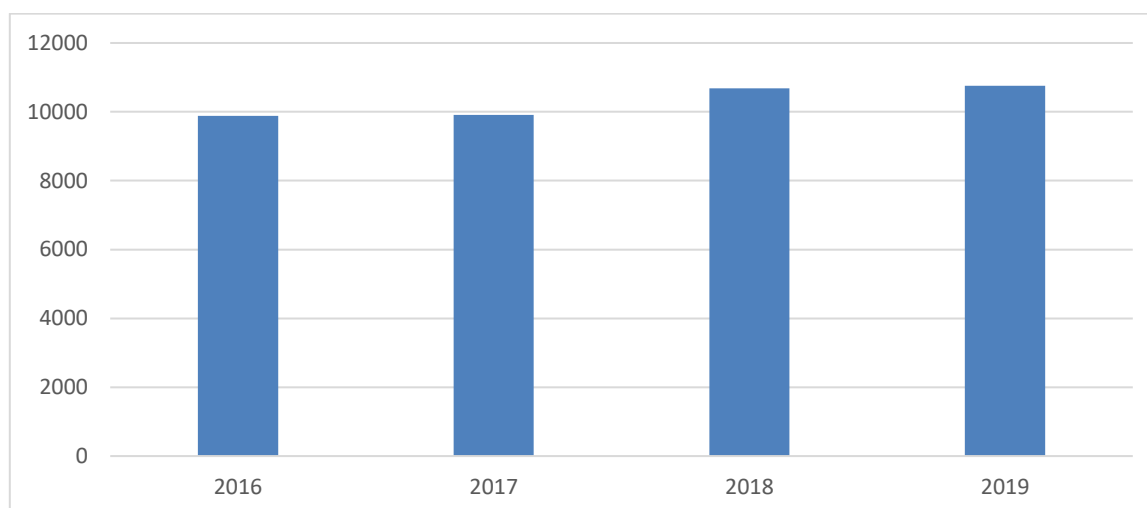


Figure F.23: Suffolk Constabulary Arrests by Year

F.2.1 Figure F.23 shows that over the last three years there has been a gradual increase in the number arrests in Suffolk. This increase is consistent with

⁶² Does not include voluntary attendees, where other forces' have used Suffolk PICs or the 96 Suffolk Custody detentions where the detainee was held at alternative PICs (e.g. Colchester, Wymondham, Braintree etc.)

identified national trends⁶³ and is likely to continue to rise over the next few years as the Linear Trend Line indicates (Figure F.24).

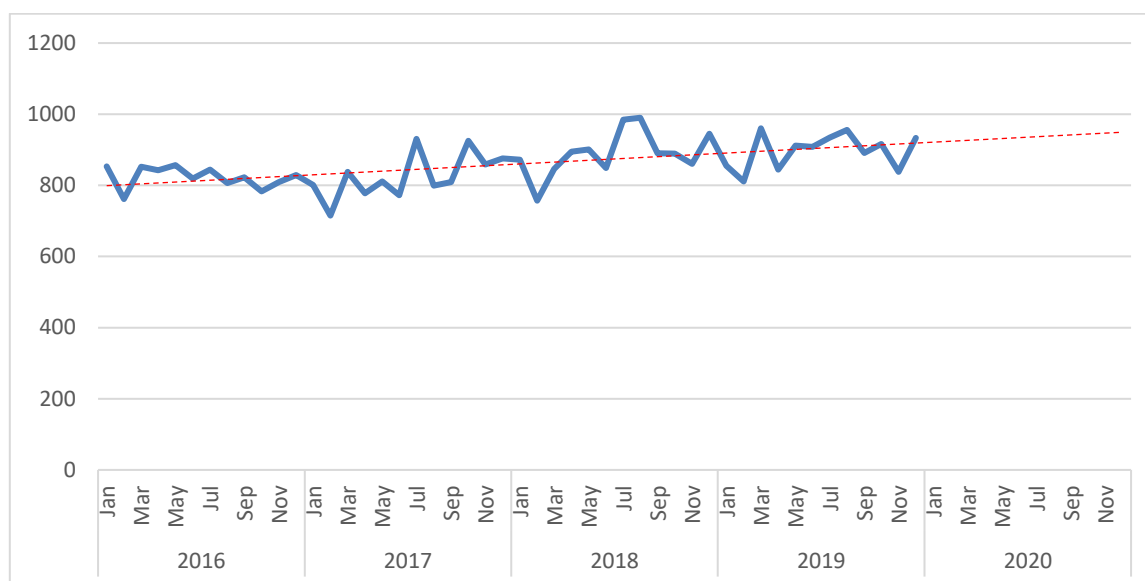


Figure F.24: Arrest Numbers by Month

F.2.2 A key factor driving the rise in detentions is an increase in Higher Levels of Arrestable Offences: ONS data from 2018 shows that while nationally crime numbers remain relatively stable, there has been a significant rise in the number of serious and resource intensive crimes being reported to police forces. ONS data for July 2017 – June 2018⁶⁴ shows a significant rise in Public Order Offences (+30%) and Robbery (+22%), with increases also recorded for Sexual Offences, Acquisitive Crimes and Violence involving a weapon.

F.2.3 The types of offenses articulated above are those that the core demographic of the SZC workforce, predominantly male between 20 and 49, are likely to be victims or perpetrators of⁶⁵. An increase in these offences will lead to a corresponding increase in arrests, and due to the type and severity of the offences will require a corresponding increase in resource allocation to manage them.

F.2.4 Figure F.25 shows the number of detentions by Suffolk Officers according to the PICs, where the detainee was taken after arrest. As previously stated, detainees are taken to the nearest PIC which has capacity to process the arrest, arrests in the East Suffolk Police District can be taken to Bury St. Edmunds, Martlesham or Great Yarmouth.

⁶³ ONS (2018) <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice>

⁶⁴ Crime in England and Wales: Year ending June 2018 available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingjune2018/latest-figures>

⁶⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendingmarch2018>

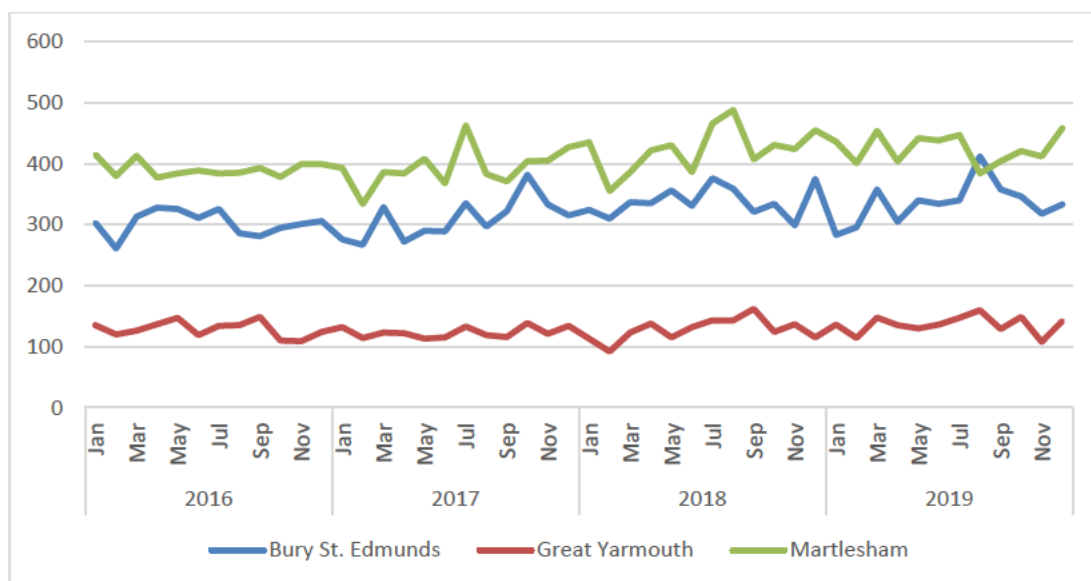


Figure F.25: Demand by PIC

F.2.5 As Great Yarmouth is shared with Norfolk Constabulary; Suffolk arrests account for just over 30% of the total demand on Great Yarmouth PIC. The data used in this report is Suffolk arrests only, which is why the figures for Great Yarmouth appear significantly lower than Bury St. Edmunds and Martlesham PICs. Any increase in demand on Great Yarmouth PIC, will therefore have an operational impact on Norfolk Constabulary as well as Suffolk Constabulary.

Disaggregation of Arrest Data

F.2.6 There is some evidence of seasonal variation in the arrest data. Figure F.26 shows that the arrest rate is relatively steady throughout the year except for July and August, which are noticeably higher.

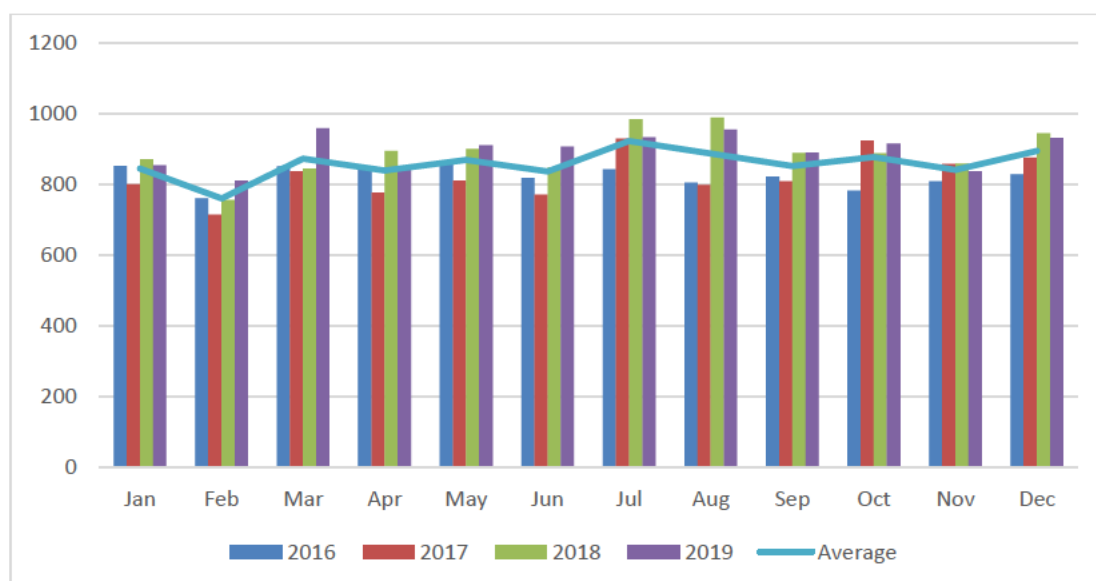


Figure F.26: Arrests by Month

F.2.7 Detainee numbers are relatively steady between Monday and Thursday with a peak in activity on Friday (15%), Saturday (16%) and Sunday (15%) (see Figure F.27).

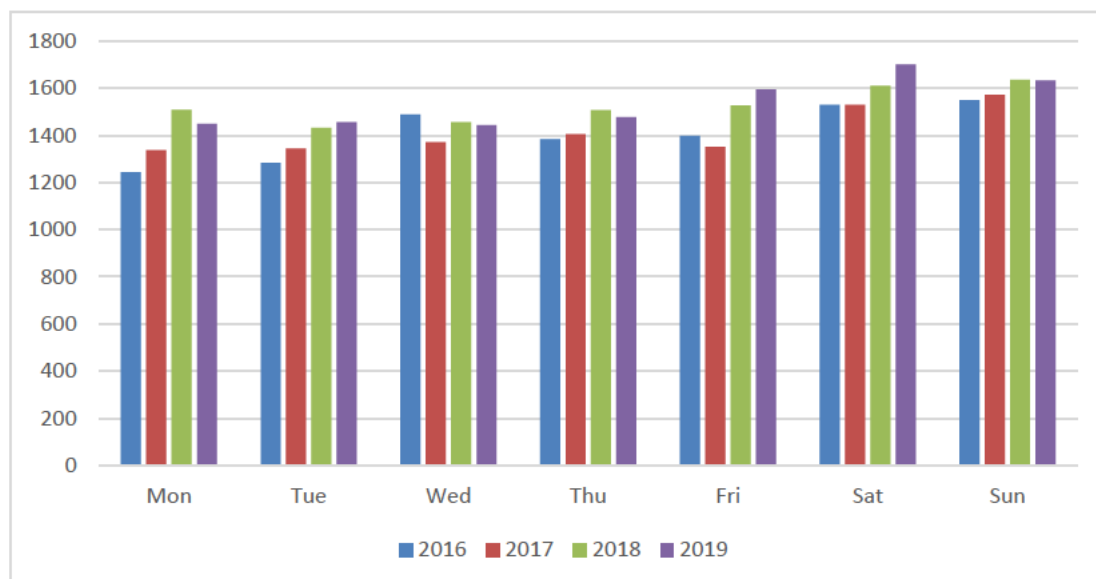


Figure F.27: Arrests by Day of the Week

F.2.8 This trend is consistent across Bury St Edmunds, Martlesham and Great Yarmouth PICs. The Friday - Sunday peak period accounts for just under half (46%) of the arrest total for the week. Tuesday has the lowest arrest rate in all three PICs.

F.2.9 The detainee profile is consistent across Suffolk. Over 70% are white males between the age of 18 and 45. Martlesham PIC shows slightly more ethnic diversity in the demographic profile than either Bury St. Edmunds or Great Yarmouth and is consistent with the wider demographic weighting in Suffolk.

Suffolk Constabulary SZC DCO Written Representation
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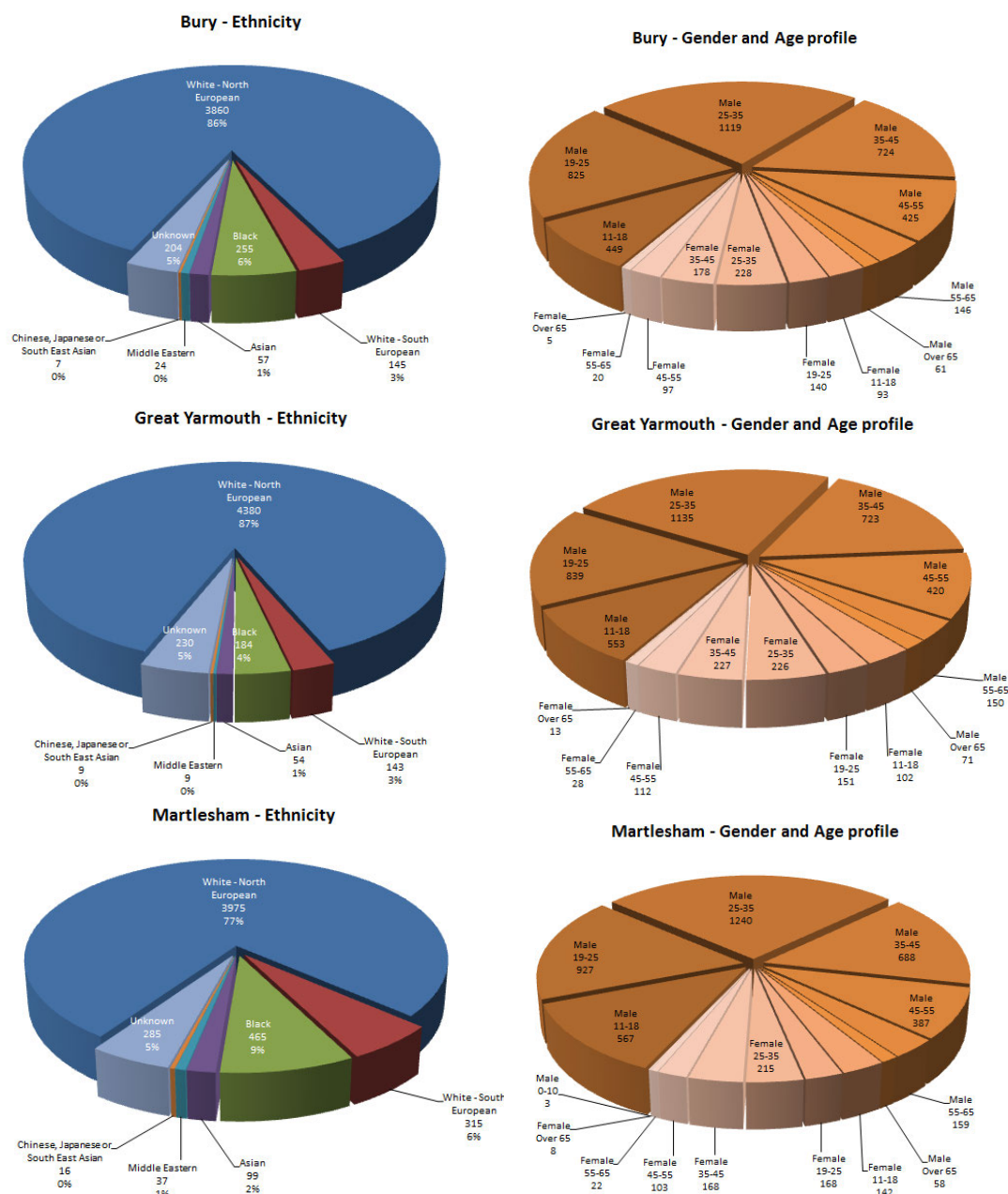


Figure F.28: Demographic breakdown

F.3 CCR

F.3.1 In 2019 there were 132,847 101 calls recorded by Suffolk Constabulary, equating to 363 101 calls per day into the CCR.

Emergency - 999 Calls

F.3.2 In 2019 there were 110,448 999 calls received by Suffolk Constabulary. This represents an increase of 5.8% from 2018 (see Figure F.29). Over the last five years there has been a 40% increase in the number of 999 calls to Suffolk Constabulary with an average annual increase of around 8%.

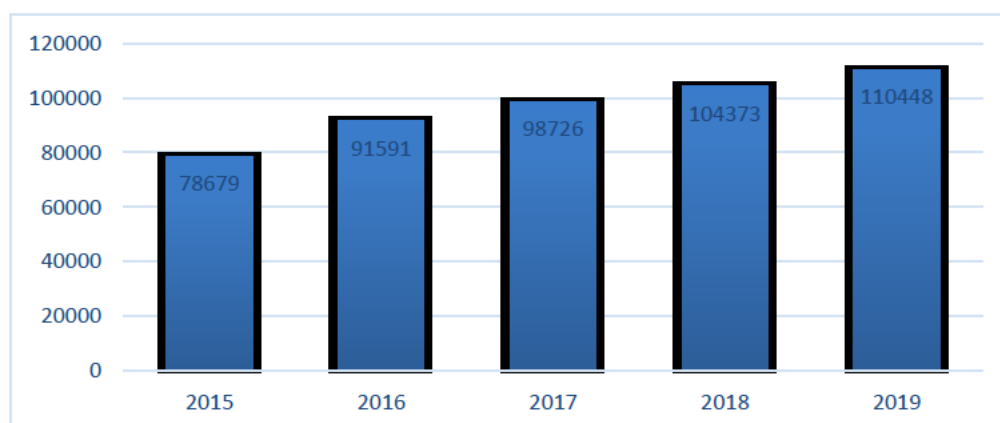


Figure F.29: 999 Calls 2015 - 2019

F.3.3 Based on current projections there is likely to be a similar increase over the next few years (see Figure F.30).

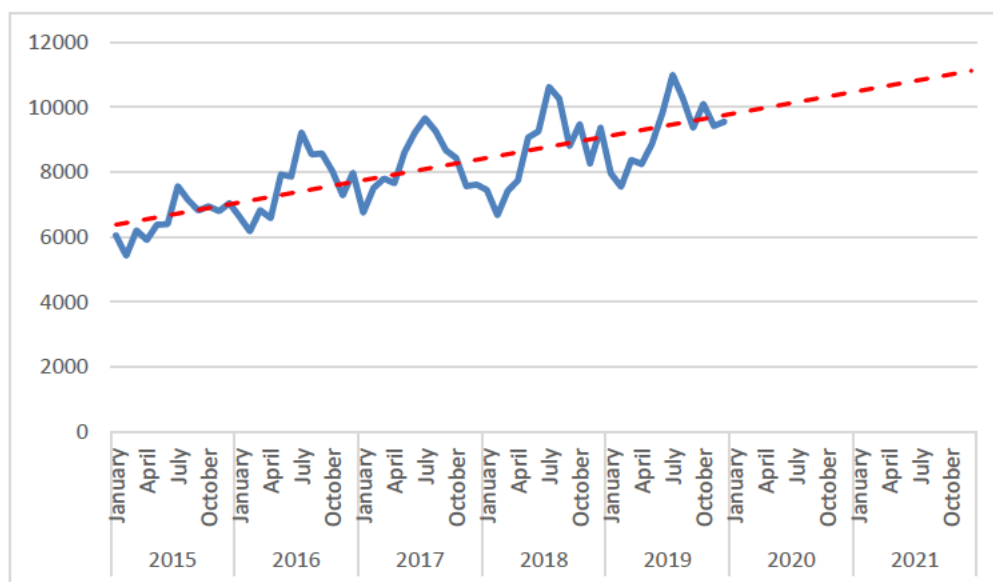


Figure F.30: 999 Call Trend

F.3.4 There is some evidence of seasonal variation in the demand on the 999 service. As Figure F.31 shows there is a noticeable peak in the number of calls over the

summer months between June and August. Demand is at its lowest during the late winter/spring months of January – April.

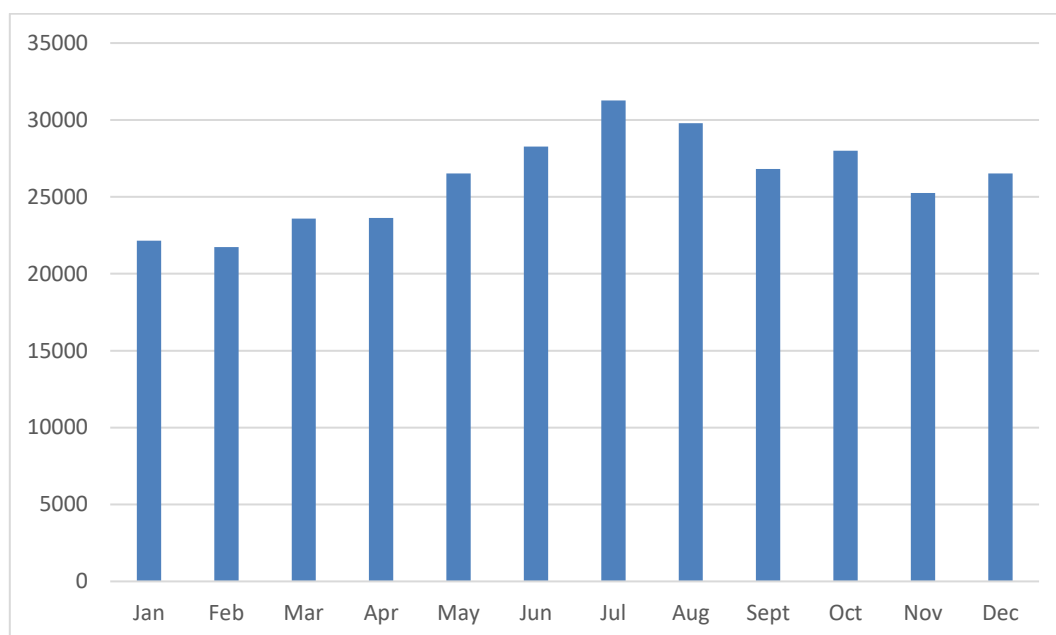


Figure F.31: 999 Seasonal Variation (Three Year Average 2017 - 2019)

F.3.5 999 call numbers are relatively steady throughout the week with slight increase in activity on Friday and Saturday (see Figure F.32). This is consistent with the pattern of demand in Custody⁶⁶.

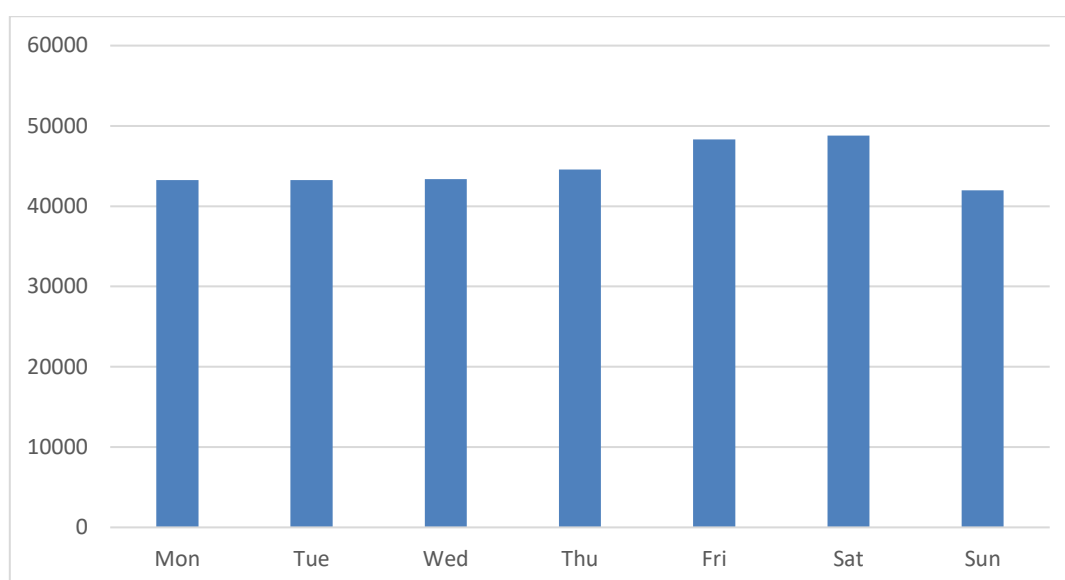


Figure F.32: 999 Calls by Day of the Week (Three Year Average 2017 - 2019)

⁶⁶ Three-year average calculated on the financial years for 2016-19.

Non-Emergency - 101 Calls

F.3.6 In 2019 there were 132,847 101 calls received by Suffolk Constabulary. This represents a decrease of 15% from 2018 (see Figure F.33). Over the last five years there has been a 30% decline in the number of 101 calls to Suffolk Constabulary with an average annual decrease of around 8%.

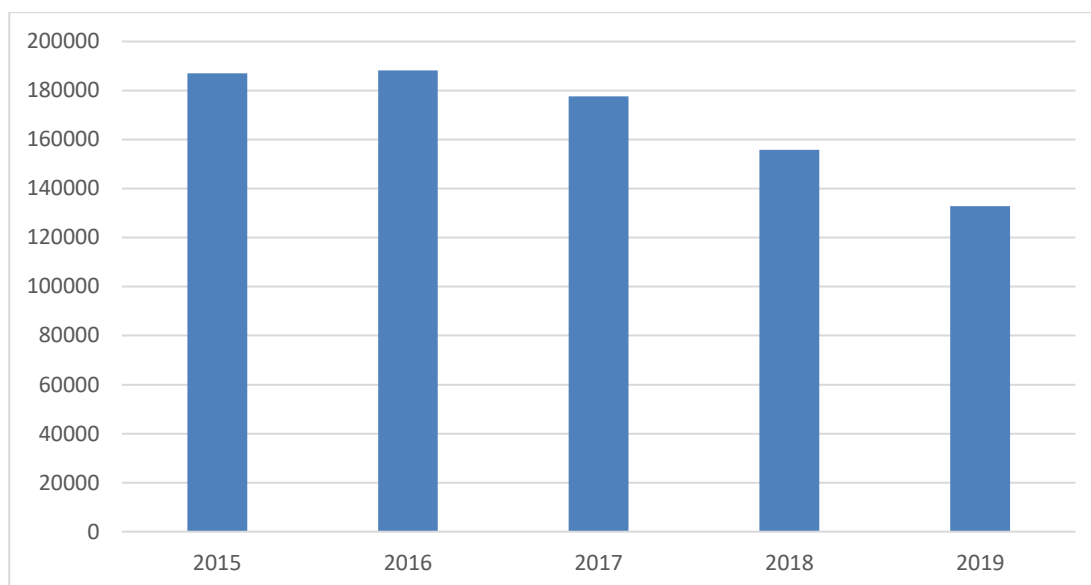


Figure F.33: 101 Calls 2015 - 2019

F.3.7 Based on current projections it is likely that there will be a similar decrease in 2020, with the possibility of further decreases over the subsequent years (see Figure F.34).

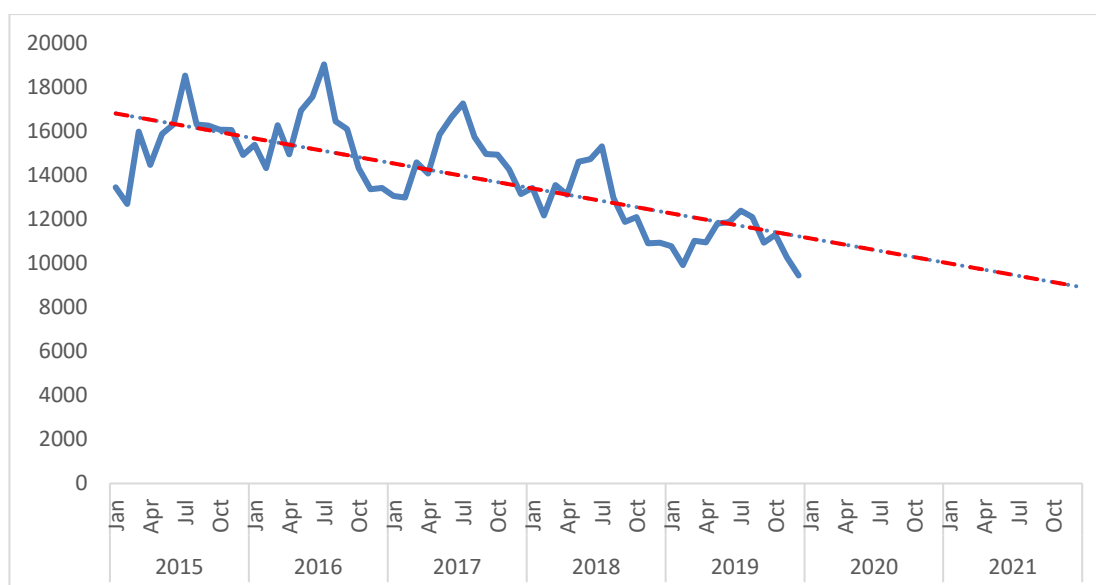


Figure F.34: 101 Call Trend

F.3.8 This decrease is partly due to more people using 999 and online reporting services through the Suffolk Constabulary website and social media platforms. For example, in 2019 there were 12,864 online crime and intelligence reports

submitted through the Suffolk Constabulary web portal. This is an average of 35 reports a day and represents a 17% rise on the number of online reports recorded in 2018.

F.3.9 101 is not as well-known as 999 and with the advent of online reporting this has created a shift in how people are using the services. Although demand on 101 has reduced, online reporting still generates demand and is showing a rapid increase in use as users become more aware of the service. 999 calls generate greater demand than calls to 101 due to the type of these call and the national requirement for these to answer within 10 seconds.

F.3.10 There is evidence of seasonal variation in the demand on the 101 service. As Figure F.35 shows there is a noticeable peak in the number of calls over the summer months between May and July. Demand is at its lowest during the late winter months of January – March. This is consistent with the seasonal demand trend in 999 usage.

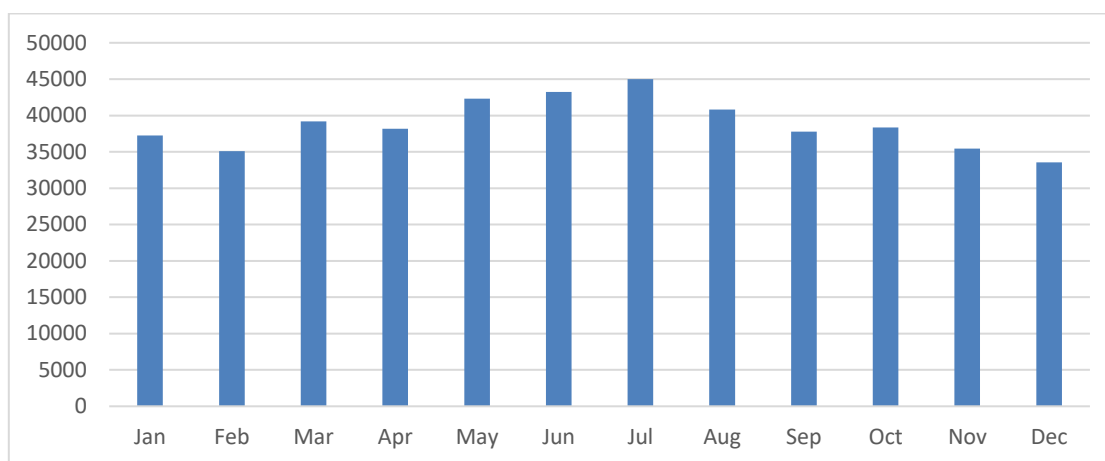


Figure F.35: 101 Seasonal Variation (3 Year Average 2017 - 19)

F.3.11 101 call data follows a different pattern of demand to 999 calls (Figure F.36). Demand is highest during the week and lowest at the weekend which is the opposite of the pattern in 999 demand.

Suffolk Constabulary SZC DCO Written Representation
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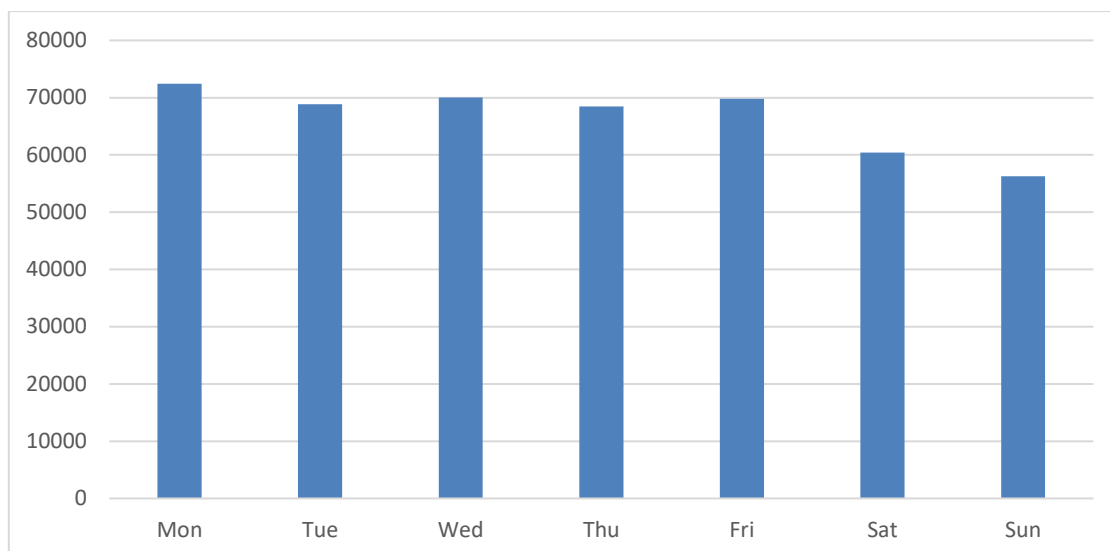


Figure F.36: 101 Demand by Day of the Week (3 Year Average 2017-19)

Appendix G SZB AIL Movement Example

- G.1.1 The Constabulary's has guided and assisted with the movement of many AILs along the A12 and B1122 corridors, including loads to the Sizewell B Power Station. That experience indisputably has shown the challenges that are to be faced by AILs accessing SZC. Information relating to one movement has been shared with the Applicant.
- G.1.2 The load was classified as an STGO3 but although the dimension of the load was below the stated threshold for the Constabulary to require a Police escort, the decision to escort was taken jointly with the haulier (heavy lift and transportation specialist Mammoet) reflecting the weight, width, anticipated breaches of Traffic Regulations, and consequential moderately low speed of the AIL.
- G.1.3 The AIL arrived on A14 under private escort where it joined the Police escort, which consisted of three uniformed officers on two marked motorcycles and a marked patrol car. The private escort vehicle continued with the AIL to Sizewell B.
- G.1.4 The police escorted noted the alignment and corridor challenges that have been expressed previously within this note, namely:
- narrow sections of route where opposing vehicles could clash;
 - tight turns and corners with limited forward visibility;
 - traffic regulations which could be transgressed; and
 - street furniture and vegetation which may be struck.
- G.1.5 In negotiating these challenges, the Police escort was required to direct opposing traffic to hold at certain points along the route to allow the AIL vehicle to cross into the opposing lane or where the load was deemed to cause a risk to oncoming traffic.
- G.1.6 Where appropriate the convoy was held in wider sections of the route or across junctions to allow following vehicles to pass the convoy, reducing congestion and delay.
- G.1.7 Motorcycles were able to operate as a team with the patrol car and move between the rear and front of the convoy. As necessary they would move ahead to manage traffic to the side or to a stop; or clear and occupy junctions.
- G.1.8 The patrol car would largely stay behind the AIL vehicle on sections of dual carriageway but would move ahead of the vehicle in single carriageway roads. In both cases, the car managed the oncoming traffic in accordance with the

'Lighting and Marking for Abnormal Load Self escorting vehicles incorporating Operating guidance'⁶⁷ and was able to do this under blue light.

G.1.9 The image below shows how the Police escort motorcycles had gone ahead of the AIL and utilised the layby on the B1122 at Theberton to direct oncoming vehicles to stop and await the AIL. The escorting patrol car then occupied the road and the AIL was then held itself, opposite the layby, allowing the opposing traffic to pass safely, including a number of HGVs.

Plate G.1: Police escort utilised the layby to wait, on B1122 at Theberton



G.1.10 Because of the presence and control of the Police escort the AIL vehicle driver was able to adopt a more central alignment and to maintain a smoother more even speed – helping the stability of the load and vehicle and limiting the loss of momentum, especially at turns. Under private escort the convoy would not be able to control the progress of the convoy in the same way.

G.1.11 In the absence of laybys in other locations, the Police escort used the additional width provided by minor junctions to both swing the AIL off the main carriageway slightly, holding it there, and allowing opposing traffic to utilise the fourth arm of the junction. Shortly before the image in Plate 12 was taken, the approaching HGV driver was seen to pull in his door mirror despite the additional space provided by this manoeuvre, still fearful of contact between his vehicle and the AIL.

⁶⁷ 'HE Code of Practice: Lighting and Marking for Abnormal Load Self escorting vehicles incorporating Operating guidance', Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/503105/Lighting_and_marking_COP_for_abnormal_load_self_escorting_vehicles_HE_rebranding_v1.pdf

Plate G.2: Use of additional width at junctions when two large vehicles pass on B1122



- G.1.12 The journey from A14 to Sizewell B took approximately 5.5hrs. Given the restrictions related to the hours and days AILs are permitted to operate, it is unlikely that more than two AIL convoys per shift could complete this journey.
- G.1.13 Whilst not required during this movement, the Constabulary notes how Police escorting of AILs enables traffic to be managed when the convoy needs to be passed by other emergency services. This has dramatically reduced the impact on the response times on those occasions. Private escorts are not able to react to the situation and legally unable to direct traffic in those instances.

Appendix H Areas covered by local policing operational areas

Table H.1: Halesworth & Leiston Local Policing Command and Leiston Safer Neighbourhood Team Geography

Halesworth Local Policing Command		Leiston Safer Neighbourhood Team	
Council Wards	LSOAs	Council Wards	LSOAs
Wrentham, Wangford & Westleton Ward	Mid Suffolk 001D	Saxmundham Ward	Suffolk Coastal 004A
Saxmundham Ward	Mid Suffolk 003C	Wickham Market Ward	Suffolk Coastal 004B
Bungay & Wainford Ward	Mid Suffolk 007A	Framlingham Ward	Suffolk Coastal 002A
Halesworth & Blything Ward	Mid Suffolk 001A	Kelsale & Yoxford Ward	Suffolk Coastal 002B
Southwold Ward	Mid Suffolk 003A	Aldeburgh & Leiston Ward	Suffolk Coastal 002C
Wickham Market Ward	Mid Suffolk 001B		Suffolk Coastal 002D
Framlingham Ward	Mid Suffolk 001C		Suffolk Coastal 002E
Kelsale & Yoxford Ward	Mid Suffolk 003B		Suffolk Coastal 003A
Aldeburgh & Leiston Ward	Mid Suffolk 007D		Suffolk Coastal 004C
Hoxne & Worlingworth Ward	Suffolk Coastal 004A		Suffolk Coastal 004D
Stradbroke & Laxfield Ward	Suffolk Coastal 004B		Suffolk Coastal 004E
Fressingfield Ward	Suffolk Coastal 002A		Suffolk Coastal 003B
Stonham Ward	Suffolk Coastal 002B		Suffolk Coastal 003C
Mendlesham Ward	Suffolk Coastal 002C		Suffolk Coastal 003D
Eye Ward	Suffolk Coastal 002D		Suffolk Coastal 003E
Debenham Ward	Suffolk Coastal 002E		Suffolk Coastal 001C
Palgrave Ward	Suffolk Coastal 003A		
Wrentham, Wangford & Westleton Ward	Suffolk Coastal 004C		
	Suffolk Coastal 004D		
	Suffolk Coastal 004E		
	Suffolk Coastal 001A		
	Suffolk Coastal 003B		
	Suffolk Coastal 003C		
	Suffolk Coastal 003D		
	Suffolk Coastal 003E		
	Suffolk Coastal 001B		
	Suffolk Coastal 001C		
	Waveney 015A		
	Waveney 015B		
	Waveney 015C		
	Waveney 015D		
	Waveney 014A		
	Waveney 014B		
	Waveney 014C		
	Waveney 013D		
	Waveney 014D		
	South Norfolk 015H		



Sizewell C
DCO Written Representation
Part 3 – Comments on DCO Application
Suffolk Constabulary

Contents

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1 Introduction

1.1 Background

- 1.1.1 This document forms Part 3 of the Written Representation ('WR') submitted by Suffolk Constabulary ('the Constabulary') regarding the Sizewell C (SZC) Development Consent Order (DCO) application. The WR builds directly on a Relevant Representation submitted by the Constabulary in September 2020, which formally registered the Constabulary as both an Interested Party and a Statutory Party in the Examination of the SZC DCO application. In doing so, the WR sets out the Constabulary's full case regarding the assessment and mitigation of likely community safety and policing impacts from the SZC project.
- 1.1.2 As indicated in the Constabulary's Relevant Representation (September 2020), the Constabulary's WR comprises two substantive elements and a summary:
- **Part 1** – Summary (in accordance with WR submission requirements)
 - **Part 2** – SZC Policing Impact Assessment (PIA): Suffolk Constabulary's assessment of likely community safety and associated policing impacts.
 - **Part 3** – Collated Suffolk Constabulary comments regarding SZC DCO application as submitted by the scheme promoter, NNB GENERATION COMPANY (SZC) Ltd (hereafter 'the Applicant') (this document).

1.2 Purpose

- 1.2.1 The WR supports the discharge of the Constabulary's roles as an Interested Party and a Statutory Party under the Planning Act 2008 by identifying likely community safety impacts from the SZC project and associated mitigation requirements.
- 1.2.2 To inform the WR, the Constabulary reviewed relevant DCO application documents pertaining to the assessment of community safety impacts and associated mitigation proposals. This part of the WR sets out the Constabulary's comments regarding relevant application documents in relation to the assessment and acceptability of community safety impacts as predicted by the Applicant.

1.3 Structure

- 1.3.1 The remainder of this part of the WR is structured as follows:
- **Section 2.1** sets out the Constabulary's comments on SZC DCO application documents relating to socio-economics and community safety matters.
 - **Section 2.2** sets out the Constabulary's comments on SZC DCO application documents relating to transport planning, and access and movement matters.

2 Suffolk Constabulary's Comments on the SZC DCO Application

2.1 Socio-economic related comments

SZC DCO Application Document	SC Ref	Suffolk Constabulary Comments
6.2 Volume 1 – Introduction to the Environmental Statement – Chapter 6 (Environmental Impact Assessment Methodology) (APP-177)	SOCIO_1.1	<p>The Constabulary agrees with the main steps in undertaking the EIA described in Plate 6.1. However, the Constabulary is concerned that the Applicant's methodology has not been applied in the assessment presented in Chapter 9 (Socio-economics) of the ES (APP-195). The Constabulary therefore considers that Chapter 9 (Socio-economics) of the ES (APP-195) does not present a full and robust assessment of likely significant community safety and policing impacts, including the identification of associated mitigation requirements.</p> <p>Plate 6.1 clearly demonstrates that mitigation measures should be identified following the assessment of likely impacts. However, the Applicant has not presented a full assessment of likely community safety impacts on a pre-mitigation basis and has not demonstrated that specific further mitigation that will be effective in avoiding likely significant adverse effects, whilst the valency of some effects is also not defined. This makes it difficult for the Constabulary to determine the adequacy and effectiveness of proposed community safety mitigation.</p>
6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement (APP-195)	SOCIO_2.1	<p><i>Summary Comments</i></p> <p>The Constabulary welcomes the inclusion of demographic effects and resulting impacts on community safety and emergency services as topics within the scope of the EIA, together with the intention to assess net additional community and policing effects. However, from reviewing the impact presented within Chapter 9 (Socio-economics) of the ES (APP-195) and associated Community Safety Management Plan (CSMP) (APP-635), the Constabulary is concerned that key points made in our pre-application consultation responses do not appear to have been fully addressed and in consequence there are gaps in the formal assessment of community safety impacts. In particular:</p> <ul style="list-style-type: none"> • Narrow scope of assessment - the singular focus of the policing impact assessment (see paragraphs 9.7.216 – 9.7.230 within Chapter 9 (Socio-economics) of the ES (APP-195)) on recorded (i.e. Home Office notifiable) crimes rather than considering wider community safety impacts requiring police involvement (whether in terms of prevention, deterrence, safeguarding, incident response or investigation). • Limited consideration of demographic factors – whilst a quantitative assessment of population dynamics has been undertaken, this does not appear to have been factored into the assessment of resulting community safety impacts (i.e. resulting from higher risk demographic profile and concentration of the non-home based (NBH) construction workforce in a rural community). <p>The Constabulary is also concerned that the impact assessment presented fails to properly recognise that the primary receptor in relation to community safety is the impacted population itself, comprising that of the local area (Leiston) and Suffolk more widely (i.e. residents, workers, visitors, users of the transport network, etc) as well as the projected SZC</p>

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		<p>workforce (construction and operational). With the responsibility for providing territorial policing across Suffolk, the Constabulary performs a critical management and mitigation role to prevent, minimise and then address community safety impacts when incidents (i.e. impacts on or affecting the population as the primary receptor) occur.</p> <p>As detailed below in relation to individual sections, the Constabulary therefore considers that Chapter 9 (Socio-economics) of the ES (APP-195) does not present a full and robust assessment of likely significant community safety and associated policing impacts. Whilst it is acknowledged that the assessment does identify a pre-mitigation likely significant effect at the local level, pointing to the need for mitigation, the assessment only captures a predicted increase in recorded crime rather than the much wider likely adverse community safety impacts which also need to be identified and adequately mitigated. To avoid residual likely significant adverse effects, sufficient capacity and other mitigation needs to be in place to allow the Constabulary to adequately and effectively respond to all relevant and likely community safety impacts from the SZC Project.</p>
	SOCIO_2.2	<p><i>Methodology</i></p> <p>The criteria adopted to determine the level and significance of likely effects are weak:</p> <ul style="list-style-type: none"> It is not clear why the valency (positive/negative) of predicted population dynamic effects has not been explored, especially as substantial demographic changes are themselves likely to generate community safety impacts (with these impacts depending on the nature of the change). Table 9.1 within Chapter 9 (Socio-economics) of the ES (APP-195) should have stated that effects could either be positive or negative depending on their nature and implications, allowing such effects to be assessed on this basis and for the community safety implications of predicted demographic changes to be fully explored. The absence of valency judgements in relation to population dynamic effects limits the ability of the ES chapter to understand, assess and adequately mitigate all likely significant effects, as it is difficult to identify specific mitigation and to confirm the effectiveness of this in avoiding specific significant adverse effects. The methodology employed to establish the significance of effects on crime and policing is deficient as: <ul style="list-style-type: none"> It is based solely on a predicted percentage change in 'recorded' (i.e. Home Office notifiable) crimes over a limited period, which excludes non-notifiable crimes and other non-crime incidents that form significant elements of the Constabulary's workload. The narrow scope of the assessment is therefore inappropriate. The predicted percentage change in recorded crime has been calculated on a per capita basis so does not account for the demographic characteristics of the workforce. Existing deprivation in Leiston, as identified within the Community Impact Report (APP-156), has also not been factored into the assessment. The methodology simply assumes community safety mitigation will be adequate to address a predicted pre-mitigation significant adverse effect on community safety and policing, without demonstrating the effectiveness of mitigation including the required quantum of additional police resourcing. This approach is not aligned with the EIA methodology set out within Plate 6.1 and under paragraph 6.4.2 within Chapter 6 (Environmental Impact Assessment Methodology) (APP-177). The role of the CSMP, namely to provide mitigation in respect of likely adverse effects assessed in the Environmental Statement, is incorrectly conflated within the significance criteria with a potential to generate beneficial effects. As a mitigation device, implementation of the CSMP cannot itself generate a substantive impact.

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		<p>Section 9.4.16 within Chapter 9 (Socio-economics) of the ES (APP-195) provides no explanation for the difference between the predicted maximum extent of daily travel in relation to non-home-based (NHB) workers of 60 minutes and the predicted Construction Daily Commuting Zone (CDCZ) for home-based workers defined as 90 minutes. This undermines confidence in the predicted HB/NHB construction workforce split, which is important as any changes to this distribution could result in substantially different community safety impacts and associated policing mitigation requirements.</p> <p>At paragraph 9.4.10 in Chapter 9 (Socio-economics) of the ES (APP-195) it is suggested the technical notes which form appendices to Chapter 9 were prepared through engagement and consultation, with Plate 9.1 above suggesting this includes consideration of “community safety, emergency service & response”. Appendices 9A – 9E (APP-196) do not directly address community safety matters and the Constabulary was not in their development.</p>
	SOCIO_2.3	<p><i>Assessment Scope and Findings</i></p> <p>This chapter includes only a very short assessment of population dynamics (i.e. demographic change), with no consideration given to the influence of the future baseline population or reference back to the baseline conditions outlined in Section 9.5. The impact assessment is therefore solely focused on the characteristics of the SZC construction workforce in isolation rather than being grounded in baseline conditions or considering likely effects from the introduction of the workforce alongside the existing population. In consequence, the assessment does not robustly address the likely change in the demographic profile resulting from the introduction of a substantial male-dominated, younger age population. This is of concern to the Constabulary as the scale of the change in demographic profile within Leiston and more widely across Suffolk is likely to generate a range of adverse community safety impacts, all of which will need to be adequately mitigated.</p> <p>The Constabulary’s main concerns regarding the assessment of crime and policing impacts are:</p> <ul style="list-style-type: none"> • Narrow scope of assessment - the singular focus of the small policing impact on the reporting of ‘recorded’ (i.e. Home Office notifiable) crimes, rather than considering wider community safety impacts which are likely to require police involvement and thus place resourcing demands upon the Constabulary. • Limited consideration of demographic factors – the quantitative assessment of population dynamics undertaken in Chapter 9 (Socio-economics) of the ES (APP-195) does not appear to have been factored into the assessment of resulting community safety impacts (i.e. resulting from higher risk demographic profile and concentration of the non-home based (NBH) construction workforce in a rural community). • Over-reliance upon the experience (perceived or actual) of the construction of Hinkley Point C (HPC) project within the Avon and Somerset Police area to predict and mitigate community safety and policing impacts from the SZC project in Suffolk. The assessment includes no consideration of geographical demographic, socio-economic, or policing differences between the two developments.

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		<ul style="list-style-type: none"> The claim at paragraph 9.7.28 of Chapter 9 (Socio-economics) of the ES (APP-195) that the predicted increase in recorded crime as a result of the SZC project (based on data from HPC) may be an “over-estimate” is not supported by evidence and should be disregarded. As detailed in Part 2 of the WR, the Constabulary believes it is inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group (SEAG) as the basis for assessing likely impacts from the SZC project, owing to known weaknesses with this data including under-reporting and as the assessment of likely impacts and the development of associated mitigation must be based on data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project in Suffolk. <p>At paragraph 9.7.29 of Chapter 9 (Socio-economics) of the ES (APP-195) the assessment recognises that recorded crime is only one contributor towards policing demands (i.e. to mitigate community safety impacts) and that others which are “not categorised” can lead to greater demands for police resourcing. However, the assessment makes no conclusion as to what these wider policing demands are, whether consideration of them in addition to recorded crime would alter the stated EIA significance conclusion and how such wider policing demands will be adequately mitigated.</p> <p>Relevant community safety “concerns” are listed in paragraph 9.7.192 (in relation to effects on social services) and the SZC Community Safety Management Plan (CSMP) (APP-635) lists a suite of community safety risks at paragraph 1.1.6. The Constabulary considers that all of the listed community safety impacts and risks are likely to arise from the construction of SZC and will therefore need to be adequately mitigated (wherever possible avoided), including through substantial involvement by the Constabulary in additional prevention, deterrence, safeguarding, incident response and investigation work alongside involvement from partner agencies. It is therefore unfortunate that the crime and policing assessment presented at paragraphs 9.7.216 – 9.7.230 of Chapter 9 (Socio-economics) of the ES (APP-195) does not take account of these wider community safety impacts, instead focusing solely on a per capita based calculation of % change in recorded crime.</p> <p>Following dialogue with the Constabulary, the Applicant included additional baseline data regarding the constabulary’s workload within Section 2.4 – Socio-economics of the submitted ES Addendum (AS-181). However, the actual impact assessment of likely effects on crime and policing and the approach to mitigation remains unchanged. The Constabulary advised the Applicant in November 2020 that whilst the inclusion of additional baseline data would be welcome in terms of helping to contextualise the assessment, in isolation this alone would not rectify identified deficiencies within the published impact assessment.</p>
	SOCIO_2.4	<p><i>Mitigation</i></p> <p>Paragraph 9.6.38 of Chapter 9 (Socio-economics) of the ES (APP-195) states that the CSMP forms tertiary mitigation developed in response to the EIA assessment. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at addressing specific likely effects in order to constitute effective EIA mitigation. However, the CSMP does not do so as it defers to the Community Safety Working Group and individual future Strategic Relationship Protocols (SRP). As noted in the Constabulary’s response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary’s response to calls for service. Due to issues with the assessment methodology and scope (above)</p>

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		<p>combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p> <p>Paragraphs 9.7.194 and 9.8.39 of Chapter 9 (Socio-economics) of the ES (APP-195) refer to the CSMP as relevant mitigation and state this will address safeguarding concerns through bi-lateral working, presumably involving and thus generating resource demands for the Constabulary. However, neither the Socio-economics Chapter nor CSMP explain how such concerns will actually be addressed.</p> <p>Paragraph 9.8.62 of Chapter 9 (Socio-economics) of the ES (APP-195) states that the Applicant will adopt a precautionary approach to manage community safety impacts, with a focus on prevention. The Constabulary welcomes this commitment but notes that effective implementation of the approach would require further additional resource funding for the Constabulary, beyond the minimum level required for incident response, enforcement and investigation, to also undertake pro-active work including additional community reassurance and deterrence patrols, targeted engagement with communities and intelligence gathering.</p>
6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement Appendices – 9A (Workforce Profile) (APP-196)	SOCIO_3.1	<p>The construction workforce has been estimated using databases of previous projects. However, no further evidence has been provided to explain this. Additionally, whilst the HB worker proportion appears to be based on percentage split this is not clear. Comparator developments are cited but no comparison of demographics, labour market or Study Areas is provided.</p> <p>Section 9.4.16 of Chapter 9 (Socio-economics) of the ES (APP-195) provides no explanation for the difference between the predicted maximum extent of daily travel in relation to non-home-based (NHB) workers of 60 minutes and the predicted Construction Daily Commuting Zone (CDCZ) for home-based workers defined as 90 minutes.</p> <p>Paragraph 1.3.7 of Appendix 9A of Chapter 9 (socio-economics) of the ES (APP-196) states the vast majority of Sizewell B workers commuted from within 35-mile radius although 50 miles (~90 mins) was the Sizewell B Study Area and has been rolled forward to SZC. The appendix fails to explain why 35 miles was not instead used as a cut-off for HB workers for SZC.</p> <p>These concerns undermine confidence in the predicted HB/NHB construction workforce split, which is important as any changes to this distribution could result in substantially different community safety impacts and associated policing mitigation requirements.</p>
6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement Appendices – 9B (Workforce Characteristics) (APP-196)	SOCIO_4.1	<p>Appendix 9B of Chapter 9 (socio-economics) of the ES (APP-196) considers the possible demographic make-up of the non-home based (NHB) workforce to help inform the assessment of impacts on local accommodation, community facilities and public services. The baseline workforce characteristics presented are consistent with the Constabulary's demographics analysis, which indicates that the predominantly young-aged male workforce population is likely to alter the existing demographic profile within the local area (Leiston), resulting in a higher risk profile.</p> <p>The Constabulary considers that likely changes in population dynamics (changes in size <i>and</i> demographic profile) in Leiston and across Suffolk due to the introduction of the SZC workforce are likely to result in a range of additional community safety effects on the population (existing community and the workforce itself). Predicted per capita community safety and policing</p>

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		from the NHB workforce therefore need to be weighted to account for the higher than average community safety risk level associated with the predicted demographic profile of the construction workforce.
6.3 Volume 2 – Main Development Site – Chapter 27 – Major Accidents and Disasters of the Environmental Statement (APP-344)	SOCIO_5.1	Suffolk Constabulary welcome that this assessment includes consideration of socio-economic related major accident and disaster risks rather than focusing only on physical environmental risks. The Constabulary is however concerned that no consideration of potential cumulative risks associated with the introduction of SZC alongside Sizewell B has been undertaken. The Applicant should consider confirm whether emergency preparedness and response for SZC would result in changes to existing plans for Sizewell B.
	SOCIO_5.2	Section 27.1.2 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) sets out the scope of the assessment but does not reference the specific requirement in Schedule 4, Paragraph 8 of the EIA Regulations to provide “ <i>details of the preparedness for and proposed response to such emergencies</i> ”. This is distinct from separate requirements to identify appropriate prevention and mitigation measures as it instead relates to mitigating major accident and disaster risks through preparedness rather than mitigating likely significant environmental effects through emergency response.
	SOCIO_5.3	There is no specific reference to emergency preparedness within the CSMP. Paragraph 5.2.18 of the CSMP (APP-635) merely defers consideration of emergency response protocols to be agreed by the Community Safety Working Group and set out in future Strategic Relationship Protocols. It is therefore not clear that emergency preparedness and response requirements, likely to include significant coordination and control duties placed upon the Constabulary, have been identified within the impact assessment.
	SOCIO_5.4	Suffolk Resilience Forum (SRF) takes lead on emergency planning and preparedness for the county. However, SRF’s plans place significant duties and responsibilities upon the Constabulary in terms of coordination and control. Emergency preparedness and response for SZC, including to deal with Major Accidents and Disasters (MA&D) risks, therefore generates resourcing and capacity issues for the Constabulary as well as for SRF.
	SOCIO_5.5	Table 27.4 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) appropriately identifies population and settlements within 5km of SZC as relevant environmental receptors. Leiston police station, fire station, GP surgery, utilities and B1122 access road identified as critical infrastructure receptors. The primary receptor impacted by the range of MA&D risks associated with SZC (including protest risks) is the population of local area (Leiston), the Applicant’s workforce and the population Suffolk more widely. The Constabulary has a critical role in the responding, management and mitigation role which extends to pro-active emergency preparedness and associated training alongside incident co-ordination, response and investigation. This will place additional resourcing demands on the Constabulary during the construction phase of SZC to discharge associated emergency preparedness and incident response requirements.
	SOCIO_5.6	Paragraph 27.2.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) omits the Constabulary’s 2017 Policing Plan (and any other relevant documents by the Constabulary) from the overview of relevant regional and local policy documents, meaning their implications have not been taken account of in the assessment. The Constabulary has a key role in MA&D preparedness and response so this should have been included.
	SOCIO_5.7	The absence of consideration of emergency preparedness requirements within the assessment means there is no assessment of emergency service resourcing or capacity to underpin the necessary preparedness or a major accident and disaster response. It is therefore not clear that emergency preparedness and response requirements, likely to include

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		significant duties placed upon the Constabulary with associated resourcing and capacity implications, have been identified within the impact assessment.
	SOCIO_5.8	The risk matrix which underpins the assessment presented in Table 27.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) assumes that the risk of civil unrest and protests “is not likely to result in serious damage”, meaning no further assessment or associated mitigation has been provided. The Constabulary disagrees with this assumption and protests are likely to generate net additional community safety impacts and policing demands which the Constabulary and partner agencies would need to manage. Such impacts extend well beyond what may be perceived as deterring and investigating traditional crime types to include prevention, deterrence, safeguarding, incident response and investigation roles.
	SOCIO_5.9	<p>Paragraph 27.7 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) states the CSMP forms tertiary mitigation developed in response to the EIA assessment. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at specific risks and likely effects in order to constitute effective EIA mitigation. However, the CSMP does not do so as it defers to the Community Safety Working Group and individual future SRPs.</p> <p>As noted in the Constabulary’s response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary’s response to calls for service. Due to issues with the assessment methodology and scope (above) combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p>
	SOCIO_5.10	<p>Risk C36 (vandalism, crime and terrorism) is proposed to be mitigated through design, onsite security and fencing, drug and alcohol testing, and the SZC Worker Code of Conduct. Mitigation to address risk C36 appears to relate only to on-site prevention and response, rather than also off-site prevention of SZC related risks in the community. It also does not account for the Constabulary’s emergency response to calls for service (whether on or off-site) alongside SZC’s security team.</p> <p>The Applicant has placed great a deal of weight on the Worker Code of Conduct as a tool to mitigate the community safety impacts of the SZC workforce. Whilst the Worker Code of Conduct sets out behavioural expectations, which is welcomed, there are significant issues when using it as an enforcement tool:</p> <ul style="list-style-type: none"> • If an individual commits a criminal act and is dealt with by the police, they do not have to disclose their profession. The Police would therefore be unaware that they work at SZC. • The Constabulary cannot disclose such information to SZC Co due to GDPR and the Applicant cannot apply for such information under the “Subject Access” route as the information sought is personal data to the individual. • There is ambiguity regarding how the Worker Code of Conduct will be applied to subcontractors. <p>Therefore, whilst the Worker Code of Conduct is welcomed as a useful tool to help mitigate community safety risks, it will be difficult to enforce and will not help to identify and report on SZC workers who come to the attention of the Constabulary. The Worker Code of Conduct is therefore likely to have only a very limited influence on reducing police resourcing demands arising from SZC.</p>
	SOCIO_5.11	The absence of consideration of emergency preparedness requirements within the assessment means there is also no assessment of emergency service resourcing or capacity to underpin the necessary preparedness or a MA&D response.

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		Table 27.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) states that requirements for emergency preparedness are set out within the Code of Construction Practice (CoCP). This is misleading as Section 4 – Incidents & Emergencies of the CoCP only identifies the need for an Emergency Co-ordinator to be appointed, emergency contacts to be established and a SRP to be put in place rather than actually providing any substantive emergency preparedness information. There is also no consideration of interactions between Sizewell B and SZC emergency planning or preparedness.
8.16 Community Safety Management Plan (CSMP) APP-635	SOCIO_6.1	<p>Chapter 9 (Socio-economics) of the ES (APP-195) and Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) both identify the Community Safety Management Plan (CSMP) (APP-635) as tertiary mitigation developed in response to the assessment of likely community safety and other relevant effects. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at addressing specific likely effects in order to provide effective EIA mitigation. However, although paragraph 1.1.10 of the CSMP (APP-635) states that a key role of the CSMP is to establish governance arrangements and ways of working to address community safety impacts, these are not then set out. Instead, the CSMP defers to the Community Safety Working Group and future Strategic Relationship Protocols to be agreed with each emergency service. Proposed mitigation measures are not robustly evidenced and have not considered any indicator beyond recorded crimes.</p> <p>As noted in the Constabulary's response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary's response to calls for service. Due to issues with the methodology and scope of the Applicant's assessment of crime and policing impacts combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p>
	SOCIO_6.2	<p>Paragraph 1.1.7 of the CSMP (APP-635) refers to Chapter 9 (Socio-economics) of the ES (APP-195) for the "formal assessment of socio-economic impacts" of relevance to community safety, yet as discussed above many of the identified community safety risks and concerns which are listed within the CSMP, and associated policing impacts, have not been formally assessed within Chapter 9 (Socio-economics) of the ES (APP-195).</p> <p>Paragraph 1.1.8 of the CSMP (APP-635) states that the CSMP identifies community safety related "issues and potential impacts" to manage and mitigate. However, the CSMP simply draws upon the limited assessment information presented in the ES and does not provide any additional assessment of effects. The CSMP does not provide any detail or a framework through which likely significant effects will be effectively mitigated and monitored. In many cases, potential effects appear to be simply dismissed, including points made by the Constabulary in pre-application consultation responses.</p>
	SOCIO_6.3	Paragraphs 1.1.6 and 5.2.2 of the CSMP (APP-635) lists 9 predicted "risks" from the SZC construction workforce and traffic as "identified through a broader risk assessment.". However, no further explanation of this process has been provided and the identified risks are not examined beyond identification in a bullet point list. As such, the absence of an impact assessment of these risks means that it is not clear what specific mitigation to address them is required and whether the proposed mitigation will be adequate and effective.
	SOCIO_6.4	Paragraph 2.2.6 of the CSMP (APP-635) notes that the Constabulary is undertaking modelling using the Applicant's data to assess potential changes in number and type of incidents to determine resourcing requirements, whilst paragraph 5.2.35 states that the Applicant is working with the Constabulary "to anticipate potential effects". However, the text does not confirm whether or how this has been taken account of in the impact assessment presented by the Applicant or if it is intended to fill

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		<p>assessment gaps. The text is therefore misleading as it implies the Constabulary has supported the impact assessment undertaken by the Applicant, rather than undertaking its own analysis to address significant deficiencies within the Applicant's assessment.</p> <p>Similarly, paragraph 2.1.1 of the CSMP (APP-635) is misleading as it indicates the CSMP has been developed through a programme of workshops and bilateral meetings with service providers, yet the Constabulary was not invited to and has not contributed to the document.</p>
	SOCIO_6.5	<p>The CSMP makes reference to points raised by the constabulary regarding the limitations of recorded crimes as the sole indicator of police resourcing, stating: "SZC Co. recognises through engagement with Suffolk Constabulary, that recorded crimes (the metric used in this assessment) are only one contributor towards police resourcing, and that information on response to non-reported incidents and dealing with crimes not categorised by the Home Office definitions can lead to greater demand for police resourcing". However, this is not taken any further and the identified limitation has not been overcome within the assessment of crime and policing effects presented within Chapter 9 (Socio-economics) of the ES (APP-195).</p>
	SOCIO_6.6	<p>Table 3.1 of the CSMP (APP-635) correctly identifies the role and priorities of the Constabulary with reference to the 2017 Policing Plan and its 4 constituent objectives. Also notes that Leiston SNT has specific priorities to deal with mental health & vulnerable people, anti-social behaviour and domestic violence. However, Table 3.1 of the CSMP (APP-635) does not provide a full community safety and policing baseline. This text was not provided by or agreed with the Constabulary.</p> <p>It is disappointing that the 2017 Policing Plan objectives and Leiston SNT 4 priorities have been identified in the CSMP but not in the impact assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195). The EIA should have assessed the extent to which SZC would be likely to affect the delivery of the policing objectives and priorities, starting with available baseline information regarding the objectives and priorities before considering how SZC is likely to interact with these. If this had been undertaken, even qualitatively, it would have resulted in a more robust community safety impact assessment and allowed for more specific mitigation to be identified.</p>
	SOCIO_6.7	<p>At paragraph 4.3.2 of the CSMP (APP-635), the demographic profile of construction workforce is not compared with the existing population, resulting in a lack of consideration of community safety impacts from predicted changes in the demographic profile of Leiston and Suffolk more widely. Paragraph 5.2.81 of the CSMP (APP-635) references a likely change in population dynamics due to SZC construction workforce but does not elaborate on associated community safety impacts. The section also does not account for deprivation within Leiston.</p>
	SOCIO_6.8	<p>No evidence is presented to examine the "broader risks" to community safety listed at paragraph 1.1.6 of the CSMP (APP-635) in any detail. Furthermore, there has been no attempt to identify the level and EIA significance of identified likely safety risks/effects on the community (as a receptor) rather than on public service resourcing demands. This means there is also no robust evidence to identify the adequacy or effectiveness of specific mitigation proposals.</p> <p>The Constabulary considers that all of the listed community safety impacts and risks are likely to arise from the construction of SZC and will therefore need to be adequately mitigated (wherever possible avoided), including through substantial involvement by the Constabulary in additional prevention, deterrence, safeguarding, incident response and investigation work alongside involvement from partner agencies. It is therefore unfortunate that the crime and policing assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195) does not take account of these wider community safety impacts, instead focusing solely on a per capita based calculation of % change in recorded crime.</p>

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	SOCIO_6.9	Paragraph 5.2.30 of the CSMP (APP-635) acknowledges that whilst increases in demand for public services should be met by central government funding, this does not allow for changes due to short term migration. In consequence, additional funding to accommodate increased service demands due to SZC will be needed. Existing police funding mechanisms (Council tax and Home Office grant calculated on a per capita <i>resident</i> basis using ONS data) will not capture much of the Non-Home Based (NHB) SZC workforce residing in temporary accommodation, meaning that without adequate additional funding being provided by the Applicant, policing services for this component of the workforce would be unfunded.
	SOCIO_6.10	<p>The claim at paragraph 5.2.47 of the CSMP (APP-635) that the predicted increase in recorded crime as a result of the SZC project (based on data from HPC) may be an "over-estimate" is not supported by evidence and should be disregarded. The assessment undertaken by the Applicant is deficient as there is consideration of wider community safety impacts beyond recorded crime and no acknowledgement of differences in geographical, demographical, socio-economic and policing contexts between HPC and SZC.</p> <p>As detailed in Part 2 of the WR, the Constabulary believes it is inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group (SEAG) as the basis for assessing likely impacts from the SZC project, owing to known weaknesses with this data including under-reporting and as the assessment of likely impacts and the development of associated mitigation must be based on data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project in Suffolk.</p>
5.1 Consultation Report (APP-068)	SOCIO_7.1	<p>The Consultation Report (APP-068) provides an account of the consultation activities undertaken by the Applicant and explains how the consultation responses received have been taken into account. However, the Constabulary does not consider that key matters raised in its responses to the Applicant's pre-application consultation exercises have been adequately addressed in the preparation of the DCO application.</p> <p>As mentioned in its Relevant Representation (RR-1140), the Constabulary has consistently raised the following key matters with the Applicant:</p> <ol style="list-style-type: none"> 1. Narrow scope of assessment - the singular focus of the policing impact assessment on recorded crimes is inadequate. Whilst the CSMP calls for the Constabulary to play an active role in managing community safety, which is to be welcomed, no consideration is given to the associated assessment of wider community safety impacts requiring police involvement (whether in terms of emergency preparedness, prevention, deterrence, safeguarding, incident response or investigation). The role of for the Constabulary in addressing community safety impacts beyond recorded crime should have been recognised and addressed; 2. Limited consideration of demographic risks – the published assessment of effects on population dynamics does not appear to have been factored into the assessment of policing impacts, as this only considers crime impacts quantitatively on a per capita basis. Coupled with the narrow scope of assessment, it is therefore difficult to determine whether the mitigation proposals set out in the CSMP will be effective in avoiding significant adverse community safety impacts; and

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		<p>3. Insufficient information regarding the range of potential transport impacts likely to require a net additional police response.</p> <p>Consequently, the Constabulary considers there to be gaps in the assessments of community safety and policing impacts which the Applicant should address in the Examination.</p>
5.13 Community Impact Report (APP-156)	SOCIO_8.1	The Community Impact Report provides an overview of the proposed effects of the SZC Project on the local communities in six defined local areas. It is noted that the Community Impact Report considers the effects on communities across the following spatial areas; Leiston ward area, Yoxford ward area, Saxmundham ward area, Aldeburgh and Snape wards area, East Suffolk district and five neighbouring districts, as the Applicant determines these areas as the most likely to be affected by the SZC Project. However, given the likely geographical spread of the construction and operational effects, these areas are considered inadequate. The Constabulary queries why wider sub-regional effects at county level have not been considered.
	SOCIO_8.2	It is noted that the Community Impact Report “draws on the information set out in the Development Consent Order application including the technical assessment of effects”, in particular the impacts assessed in the Environmental Statement (ES). However, due to the deficiencies in Chapter 9 (Socio-economics) of the ES (APP-195), the Constabulary is concerned that the Community Impact Report, as currently drafted, does not fully assess some community risks/effects and there is at risk of selective reporting.
	SOCIO_8.3	Section 2.4.8 of the Community Impact Report explains how Suffolk’s Hidden Needs Report identified pockets of high levels of deprivation and disadvantage across Suffolk that is not reflected in national statistics and confirmed that areas around Leiston are “some of the most deprived in Suffolk”. However, the Applicant fails to elaborate on this in the Community Impact Report nor consider this in the crime and policing impact assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195).
	SOCIO_8.4	It is estimated that there would be a peak of 3,634 additional construction workers within the locality of Leiston. Section 2.6.30 states that “this change in population would be a significant change in Leiston, although it is not possible to assess whether it would be a beneficial or an adverse effect”. The Constabulary considers this a weak position and makes it unclear what likely significant adverse effects need to be mitigated. Therefore, it is difficult for the Constabulary to determine the effectiveness of the proposed mitigation measures.
	SOCIO_8.5	Positively, at Section 2.6.34 of the Community Impact Report, the Applicant acknowledges that liaison with the emergency services is required to develop and monitor the mitigation measures proposed. The Applicant also identifies a need for financial contributions to the emergency services via Section 106 agreements to help develop and monitor the Community Safety Management Plan (CSMP). Whilst the Constabulary welcomes the mitigation measures listed under Section 2.6.34, the Applicant does not explain what the likely impacts are which trigger mitigation requirements or why the specified measures will be adequate and effective in addressing likely community safety impacts. There is therefore no clear and objective basis upon which to define and agree appropriate financial contributions and mitigation measures required.
5.14 Equality Statement (APP-158)	SOCIO_9.1	The Equality Statement considers the potential effects on equality as a result of the construction and operational phases of the Sizewell C Project. It is noted that the scope of assessment presented in the Equality Statement “has been informed by a review of the effects identified in the application documents, and a comparison with the equality assessments made of

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		<i>other DCO applications</i> ". The Constabulary is therefore concerned that the Equality Statement suffers from the same deficiencies as Chapter 9 (Socio-economics) of the ES (APP-195). Furthermore, there is no consideration within the methodology of the influence of existing deprivation of Leiston on community safety impacts or potential interactions with SZC workforce.
	SOCIO_9.2	The baseline, presented at Section 1.4 of the Equality Statement, focuses entirely on demographics and protected characteristics. There is no consideration of wider socio-economic issues, including income/wealth inequality or existing deprivation in Leiston. Furthermore, Section 1.6.66 notes that young men are on average more likely to be a victim of crime but does not acknowledge increased risk of perpetration. The combined higher risk profile of the construction workforce demographic is not recognised and has not been factored into the assessment of crime and policing impacts presented within Chapter 9 (Socio-economics) of the ES (APP-195).
	SOCIO_9.3	As drafted, the Equality Statement does not outline any specific mitigation to address the identified likely differential impacts on persons with protected characteristics. Rather, the Equality Statement relies on general mitigation proposed in other documents.
Accommodation Strategy (APP-613)	SOCIO_10.1	Paragraph 2.5.2 of the Accommodation Strategy advises "the existing population is relatively dynamic and mobile" and cites 4% annual net immigration estimate for Suffolk. However, no comparison with national or other regional averages have been provided and there is no acknowledgment of the relatively rural and ageing demographics characteristics of Suffolk. The strategy also fails to consider future baseline conditions (demographics, housing needs or temporary accommodation provision within NHB catchment or local wards).
	SOCIO_10.2	No consideration given to the impacts of COVID-19 on continued provision of and demand for tourist accommodation. The Applicant should confirm whether its assumption of 800 workers being accommodated by this sector is still valid. The Constabulary are concerned that if this assumption has changed then this would increase demand for other sources, which could have impacts on community safety and policing.
	SOCIO_10.3	Paragraph 5.1.3 of the Accommodation Strategy outlines the predicted benefits of worker campus accommodation, with reference to HPC, but fails to address the known issues including poor wellbeing and mental health incidents that have occurred at HPC. These known issues, including mental health calls and mental health related incidents could give rise to several community safety impacts which would require policing involvement to mitigate. The Accommodation Strategy provides no explanation of how the SZC accommodation campus differs or would learn lessons from the HPC experience. The Constabulary has routinely explained to the Applicant that their over-reliance upon data collated from the HPC project is flawed.
	SOCIO_10.4	The Accommodation Strategy makes reference to the Worker Code of Conduct as a community safety mitigation measure. The Applicant has placed great a deal of weight on the Worker Code of Conduct as a tool to mitigate the community safety impacts of the SZC workforce. Whilst the Worker Code of Conduct sets out behavioural expectations, which is welcomed, there are significant issues when using it as an enforcement tool: <ul style="list-style-type: none"> • If an individual commits a criminal act and is dealt with by the police, they do not have to disclose their profession. The Police would therefore be unaware that they work at SZC. • The Constabulary cannot disclose such information to the Applicant due to GDPR and the Applicant cannot apply for such information under the "Subject Access" route as the information sought is personal data to the individual.

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		<ul style="list-style-type: none"> There is ambiguity regarding how the Worker Code of Conduct will be applied to subcontractors. <p>Therefore, whilst the Worker Code of Conduct is welcomed as a useful tool to help mitigate community safety risks, it will be difficult to enforce and will not help to identify and report on SZC workers who come to the attention of the Constabulary. The Worker Code of Conduct is therefore likely to have only a very limited influence on reducing police resourcing demands arising from SZC.</p>
	SOCIO_10.5	Existing police funding mechanisms (Council tax and Home Office grant calculated on a per capita <i>resident</i> basis using ONS data) will not capture much of the Non-Home Based (NHB) SZC workforce residing in temporary accommodation, meaning that without adequate additional funding being provided by the Applicant, policing services for this component of the workforce would be unfunded.

2.2 Transport related comments

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6.3 Volume 2 – Main Development Site – Chapter 10 (Transport) of the Environmental Statement (APP-198)	TRA_1.1	The assessment follows relevant IEMA guidance on scope and methodology. It considers the potential effects of severance, pedestrian delay, amenity, fear and intimidation, driver delay, accidents and safety and hazardous loads. All of these are pertinent to Community Policing matters.
	TRA_1.2	The Applicant's assessment of impacts relies on a range of commitments to construction and operational processes which will need to be adhered to meet the reductions in impact asserted to within the documents (e.g. commitments to maximum vehicle movements at periods in the construction; the management of vehicles and materials and the scheduling and management of Abnormal Indivisible Loads (AILs), etc)
	TRA_1.3	<p>The Constabulary does not contest the following core assumptions of this chapter:</p> <ul style="list-style-type: none"> • Method of appraisal and the geographic focus of the assessment • Legislative, policy and guidance base • Assessment scenario years and windows • Criteria for receptors, magnitude of impact and classification of effects • Description of the existing study area and the review of base data • Predictions of growth and generated vehicles (with the exception of AILs – which are not covered in this chapter) <p><i>The Constabulary does not take a view on the propensity of mitigation measures to resolve capacity or network operation impacts either during construction or operation of the project. This position is deferred to the affected Local Authorities.</i></p> <p>The Constabulary raises concerns about the capability of elements of the proposed mitigation to allow the safe and efficient operation of large construction vehicles and AILs e.g. the routing of large vehicles at the proposed junctions on the proposed Sizewell Link Road and the movement of AILs along the access corridor without Constabulary intervention or assistance. These concerns have been raised with the Applicant and are documented on the 'Comments Register' between the Constabulary and the Applicant.</p>
	TRA_1.4	The Constabulary is not in agreement with the prediction, programming and management of AILs associated with the construction period. AILs have been assumed to use the network out of the scenario periods within the ES and are therefore not scoped into the ES. In the interest of public safety and the safe and efficient operation of the road network, the Constabulary is in agreement with this working assumption and will work with the Applicant better to predict the movement of AILs, to programme their movement and manage how those movements are made.
	TRA_1.5	The Constabulary is concerned that large vehicles cannot pass each other safely along B1122 and seeks commitment from the Applicant on how it will manage the safe operation of that route during the life of the construction project. Even after construction of the SLR, the B1122 is to be used for construction traffic arriving from and departing to the north of Yoxford. Aside from committing to a cap on the number of HGVs accessing the main worksite, the Applicant must demonstrate how it will protect the safe and efficient operation of that route. Currently, the Applicant does not propose to include the Constabulary within the Transport Review Group (TRG). The Constabulary is therefore reliant on other mechanisms to feedback to the Applicant about the on-going monitoring and management of the network and the effectiveness of the measures committed to.

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	TRA_1.6	The Constabulary is concerned that this chapter does not fully reflect the severance and fear and intimidation that the change in quantum of HGV traffic will have on the movement of vulnerable road users across the access corridors e.g. across A12 at Little Glemham, within Leiston or at PROWs along the corridor.
	TRA_1.7	The criteria set out in the ES specify large magnitudes of change before a major adverse impact is deemed to be generated and as such the significance of the changes are often determined not to require substantive or robust mitigation. For example, the Applicant has relied on speed limit changes to mitigate effects on B1122 and impacts on cycling and walking, without evidence as to how those limits would be self-enforcing and therefore their effectiveness is questionable. The Applicant proposes funding through a s106 agreement to create mitigation within Leiston, to address impacts on walking and cycling severance and delays, however, the Applicant does not explain how that funding would mitigate the effects. The Constabulary has raised concerns with the Applicant over the rigour of the proposed mitigation and works with SCC to maximise the effectiveness of measures and initiatives.
	TRA_1.8	The ES relies on the assessment of accidents and road safety provided in the Transport Assessment (TA) and professional judgement as to the magnitude of effect. The Applicant asserts that there are no major adverse effects assumed to be created during the construction or operation of the Project. Greater detail on the accident analysis is appraised in the review of the TA and in context with the Constabulary's own assessment of roads policing and safety impacts (refer to WR Part 2).
	TRA_1.9	<p>The access and movement effects from construction traffic would be managed by implementing off-site infrastructure (e.g. Two Villages Bypass, the Sizewell link Road, Freight Management Facility and Park and Ride sites) and a series of management plans:</p> <ul style="list-style-type: none"> • Construction Traffic Management Plan (APP-608), • Construction Worker Travel Plan (APP-609) and Traffic • Incident Management Plan (APP-607). <p><i>The Constabulary requests certainty over mitigation which are integral to reducing burdens on community policing and network safety and operations. Included with that mitigation are the reductions in movements by road for materials, equipment and AILs such as the Beach landing facility and Rail upgrades. The Constabulary has prepared a Comments' Register and a Roads Policing and AIL Impact Assessment which sets out its concerns with the evidence, assessment and proposed mitigation and management. The mitigation is currently insufficient for the management of AILs and there are detailed queries about the viability and feasibility of aspects of the mitigation measures, as proposed.</i></p>
8.5 Transport Assessment (APP-602)	TRA_2.1	Whilst policing issues are not directly covered in the Transport Assessment (TA), the transport impacts assessed within the TA will have a direct impact on policing issues. i.e. the number of HGV / AILs and cars forecasted to be generated and where and when these are assigned on the local road network and at which of the identified sites and facilities.
	TRA_2.2	The TA does not recognise fully the impacts on community policing and enforcement that the Constabulary anticipate would be generated during the construction period. The Constabulary is particularly mindful that predictions for AIL movements and the management of those loads are not addressed adequately within the TA and other evidence.
	TRA_2.3	The HGV traffic movements modelled in the early years and peak construction 'busiest day' 'With Sizewell C' scenarios were based on the HGV movement limits within the Construction Traffic Management Plan (CTMP) (APP-608). No more than 600 movements (300 deliveries) in the early years and 1,000 movements per day (500 deliveries) in the peak construction phase. Whilst these are robust assumptions the movements are predicted to be greater than 1 movement per minute at peaks in each direction along roads and at

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		junctions. There is concern that this flow will create congestion at gate lines and cause disruption and danger at those points on the network.
	TRA_2.4	Predictions of AIL movements have been developed by the Applicant solely based on the limited relevant information contained within the TA. The Constabulary has previously expressed significant concerns about the programming, management and monitoring of the AIL movements and how those activities will draw on Constabulary resources during the construction period.
	TRA_2.3	The TA methodology and results of the assessments inform the mitigation which the Applicant has developed. Proposals for off-site mitigation (e.g. Sizewell Link Road, Two Villages' Bypass, Freight Management Facility and Park and Ride sites) are proposed to help mitigate some of the effects of increased traffic flow and the associated increase in HGV traffic. The Constabulary has sought clarity about certain details of the proposals, to help understand how the new infrastructure will operate and the need for Constabulary resources to manage and enforce the legal use of that infrastructure (e.g. movements which are required to contravene regulation whilst travelling to or from the worksites)
	TRA_2.4	Future baseline includes committed growth and sensitivity test around Scottish Power proposals. However, influence of Highways Englands proposals / works at Copdock A12/A14 interchange have not been taken into account in the assessment and interaction with build period. Further proposed schemes should be reflected such as Highways England's proposals for the dualling of A12 Woodbridge / Seckford Hall to B0179.
	TRA_2.5	<p>The Constabulary is concerned about the:</p> <ul style="list-style-type: none"> • appraisal of impacts of the movement of AILs during the construction phases; • mechanisms by which the Applicant proposes to engage with the Constabulary during the construction of the Project; • methods of management of the gate line to the worksite, and how that will not disrupt the safe and efficient operation of the adjoining road network; and • detail of the off-site mitigation and how that will be used safely and efficiently and without the need for intervention by the Constabulary. <p>The Constabulary defers to Suffolk County Council (SCC) to reach agreement with the Applicant over the principal assumptions on access and movement that are taken as part of the evidence base, where these do not affect the community policing and the Constabulary's resources.</p>
	TRA_2.6	<p>The assessment of network impacts has been undertaken using both macro strategic modelling on a broad network with reassignment viable within the network for background traffic and on a more local basis (VISSIM) without network reassignment but with a range of third-party mitigation (Brightwell Lakes) at junctions along the A12 corridor. The assessment of peak period network operation indicated no major deterioration in congestion and delays, however, sensitivity analysis has not been carried out of the effects of that third-party mitigation not being realised or the absence of reassignment within the strategic model. A sensitivity scenario should also be considered to assess the effects on the network of slow moving AILs and the resultant residual effects on the network during the following peak period. The Constabulary defers to SCC for the approval of the assumptions taken by the Applicant in its evidence and assessment. However, the Constabulary has reservations about the appropriateness of network reassignment and the certainty of realising the third-party mitigation.</p> <p>The Constabulary has requested that the Applicant considers carrying out sensitivity testing.</p>

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	TRA_2.7	<p>The Constabulary defers to SCC to determine the suitability of proposed mitigation to resolve the adverse effects of the Project on the road network during construction and operation. The Constabulary does have concerns with some details of the mitigation including the management of construction traffic, particularly AILs, and the layout of that mitigation register.</p> <p>Mitigation measures are proposed and detailed in the Applicant's Implementation Plan (APP-599) and TA. The Applicant is proposing to implement or provide a contribution to fund road safety improvements on the B1078 corridor at the A140/B1078 junction west of Coddensham and on the B1078 in the vicinity of Easton & Otley College to mitigate potential highway safety issues. The Constabulary notes proposals for on-going engagement during the construction period but it has concerns that the mechanism does not allow for adequate engagement.</p>
8.6 Traffic Incident Management Plan (TIMP) (APP-607)	TRA_3.1	The Traffic Incident Management Plan (TIMP) forms part of a package of transport management documents to assist in the control of transport movements for the Project. The Constabulary agrees with the principles but does not consider that policing issues have been sufficiently covered in the draft TIMP.
	TRA_3.2	The TIMP does not provide a robust basis to plan for incidents. The TIMP recognises the role of the statutory bodies, including the Constabulary, but does not provide a framework from which to manage the network. The Constabulary has advised the Applicant that a scenario matrix of predictable incidents should be prepared and considered in partnership with the Constabulary and Suffolk County Council Highways and Highways England to refine the planning for those incidents. This should be done prior to consent and not left to later agreement.
	TRA_3.3	<p>The Applicant proposes ad hoc engagement of the Emergency Services in the Transport Review Group for the development of the TIMP. It is the Constabulary's opinion that this is not sufficient, and the Constabulary should be represented as a regular member of any monitoring and management groups.</p> <p>The Transport Review Group (TRG) would monitor progress associated with the TIMP; apply the Transport Contingency Fund and amend the TIMP, as required. Clarification is required regarding the magnitude of the Transport Contingency Fund and how it will be applied</p>
	TRA_3.4	<p>The Constabulary has a duty to manage the safety of the road network and its users during times of incident. This function is carried out in collaboration with SCC and Highways England. Those organisations would work with the Applicant and its contractors to help safely to regain construction operations as quickly as appropriate following an incident. The TIMP should further identify the procedures for managing planned or foreseen events, such as the temporary closure of the Orwell crossing or planned closures of the access routes for maintenance or on-line construction works.</p> <p>The Constabulary should also be engaged in the approval of the final TIMP as the process would affect the Constabulary's resources during the management of incidents, and also the Constabulary will influence the way that incidents are managed, and operations returned to business as usual. The Constabulary is very aware of the need to manage and potentially close the A12 corridor during major incidents and the impacts that will have on the construction process. It is therefore important that the Applicant works with the Constabulary to refine procedures and mitigate the impacts of incidents.</p>
	TRA_3.5	Community policing in relation to incidents is both reactive and can be proactive. Where possible the reactive nature of incident management should be scenario tested. This planning and testing can assist with responding to incidents, including the Community focused element of policing e.g. responding to public concerns. The Constabulary is not confident that the Applicant has sufficient measures or procedures identified or in place within the current draft of the TIMP to allow the effect management of the effects on incidents and the draft TIMP should be revised to strengthen the framework to form the Certified Document in preparation for the development of the agreed TIMP.

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	TRA_3.6	By their nature incidents are generally unplanned, however, predictions for likely incidents; risk appraisals and contingency plans of those incidents can help to reduce the reactive needs and assist with planning for those eventualities. The draft TIMP includes indications of a series of planned and unplanned incidents and events for which the basic communications channels are stated, and the headline management measures are set out. Better planning will help to refine the effects on community policing and allow for better resource management. The Constabulary is identified as a stakeholder for the TIMP. It is the Constabulary's view that they should be a formal representative in the refinement of the final agreed TIMP and the on-going monitoring, management and review. The Constabulary is a fundamental partner in the management of incidents and events on the road network and should therefore be more heavily involved and not just consulted on what is to be agreed.
	TRA_3.7	The control mechanisms within the draft TIMP rely heavily on contractors and hauliers conforming to the predetermined procedures, where vehicles are redirected or curtailed at off-site facilities or prior to departing their origin depots. Further detail is required about the systems for communicating altered access plans in the live situation and how that will affect HGV access to the off-site facilities and the main works site. These systems will need to be reviewed during the construction period to ensure they are working acceptably.
	TRA_3.8	The Applicant indicates in the draft TIMP that under set circumstances construction related HGVs would be held at the Park and Ride sites. It is stated that the details of how many vehicles and how those vehicles would be managed within those sites are yet to be determined. The suitability to accommodate those vehicles in those locations is key to the viability of the strategies within the TIMP. The Applicant should provide further evidence within a revised draft TIMP, prior to consent.
	TRA_3.9	The TIMP should include a matrix of contingency scenarios to guide the better management of incidents and the preparation for diversion routes and temporary management. This contingency planning would reduce the reactive nature of the document for all project related travel not just HGVs. The contingency fund proposed in the Head of Terms of the s106 agreement is noted and should be refined to reflect the scenarios appraisals and where mitigation could be applied to facilitate the operation of the TIMP. The Constabulary would be happy to work with the Applicant, SCC and Highways England to refine the contingency planning – including reviewing current diversion routes.
	TRA_3.10	The management processes and groups; the mechanisms for control and communication; and the incident contingency planning are not considered adequately advanced in the draft TIMP. These need to be strengthened and amended. The review should include consideration of likely incidents and the preparation of contingency plans to cater for operations during those incidents and the recover periods after the incidents - such as temporary amendments to working hours and HGV traffic profiling relative to the agreed caps on movements.
	TRA_3.11	The assertion that the finalised TIMP will be developed post-consent is not accepted by the Constabulary. Rather the TIMP should be developed during the DCO Examination and concluded prior to consent. The Constabulary respectfully requests that the TIMP, CTMP, CoCP and CWTP are certified document in the DCO.
8.7 Construction Traffic Management Plan (CTMP) (APP-608)	TRA_4.1	<p>The Constabulary is in general support of the principle of a CTMP as it should help to manage the impacts of construction traffic. However, as currently drafted the CTMP falls short of the details required to be agreed. These include:</p> <ul style="list-style-type: none"> • Further detail on AILs required; • Inclusion on the working and monitoring group; <p>Assurances over the implementation of the associated mitigation (two villages bypass etc).</p>
	TRA_4.2	It is assumed that the 'construction period' covered in the CTMP includes site establishment, enabling works and demobilisation periods. However, clarification from the Applicant is required.

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	TRA_4.3	The draft CTMP makes no reference to the need for new and amended Traffic Regulation Orders that could be required to assist with the operation of the network and the role the Constabulary would play in the refinement and determination of those.
	TRA_4.4	No reference is made to how the measures proposed within the CTMP will affect the communities along the defined access routes and other communities proposed to be protected from construction traffic e.g. Saxmundham and Leiston. Indications of sums to address road safety impacts in these settlements are made within the TA, however, details of the remedial measures are not set out and are left to Suffolk County Council to apply the funding through a s106 Agreement.
	TRA_4.5	The assessment of AIL numbers and the resultant draw on Constabulary resources is not sufficiently set out and quantified within the CTMP. The CTMP does not specify the temporary traffic management measures which could be required on local roads to facilitate the movement of AILs or the management of traffic associated with the construction period – such as waiting and loading restrictions. A set of proposed speed limits is included in the Schedules of the draft DCO but not carried forward into the CTMP.
	TRA_4.6	<p>Policing issues and the resource requirements of the Constabulary are not fully covered in the draft CTMP. The draft CTMP identifies the general role of the Constabulary in 'assisting' with the escorting of AILs and the standard notice period for these. However, it does not reflect the specific importance of the movement of AILs associated with this project and the increased management that the Constabulary require to help safeguard the operation of the network.</p> <p>The Constabulary will require robust coordination of the movement and management of AILs into and away from the Project and co-ordination with other non-Project related AILs. This will require:</p> <ul style="list-style-type: none"> • Trained police resources to escort all AILs (wide, over-weight and long) e.g. at North P&R site access roundabout - the CTMP and CoCP must reflect this. • Require AIL predictions to be more refined and include mobile cranes, ballast, and switch outs – this planning will require a defined process in the CTMP that can be flexible to reflect programme change and design refinement. The process will be more robust than the standard notice periods. The process should reflect the need for co-ordination with at grade rail crossings (e.g. Yoxford Road) and the confirmation of the suitability of those crossings and other structural / layout restrictions. Details of the AIL movements at Hinkley Point C would be reviewed and categorised to inform the strategy for AIL management. • Seek contingency planning around the BLF being unavailable (e.g. due to adverse weather) and for a contingency access strategy to be defined for access to the works site at that time. This should be noted in the CTMP and set out in the TIMP.
	TRA_4.7	<p>The Constabulary has network management and enforcement duties. The following points should be reflected in the CTMP:</p> <ul style="list-style-type: none"> • The inclusion of the Constabulary within monitoring and review processes, and planning for events/movements, such as representation on the TRGs to allow for better planning and review. • The planning for peak period events such as major pours or extractions. <p>Details on the management and enforcement of construction traffic routeing and compliance with network legislation (e.g. speeds, obstruction) and expanding on the mention of ANPR or the emerging use of GPS. Thus, it should include detailing which contractors and hauliers will be covered by those initiatives.</p> <p>If further iterations of the CTMP do not adequately address the Constabulary's concerns, there is the likelihood that disruptions to the network due to poorly planned road movements; poorly managed route operations; increased road traffic collisions; and traffic law transgressions will be increased. This could result in delays to the construction programme; added costs and a negative image for the project.</p>

Application Document	SC Ref	Suffolk Constabulary Comments
	TRA_4.8	<p>Mitigation measures presented in Section 4 of the CTMP provide a good basis for further iterations of the draft CTMP and subsequent detailing within the final approved CTMP. However, the Applicant needs to extend the robustness of the draft CTMP so that it is not implicitly reliant on schedules in the DCO or other statute and guidance. The CTMP needs to provide more detail on the traffic management strategy and planning, including:</p> <ul style="list-style-type: none"> • Reflecting the draft DCO Schedule 14 'Traffic Regulation Measures' needs to include waiting and loading restrictions required as well as the speed restriction changes. The full schedule should be reflected in the CTMP; • The governance process for TTROs and permits etc, HGV management and profiling; LGV compliance (including how to enforce the use of non-strategic roads) • The management of temporary and permanent traffic management measures; • The management of vehicles approaching and leaving the area – to ensure there is no waiting in surrounding roads or overnight; • The driver and haulier compliance requirements e.g. safer drivers, safer vehicles; and • The management of the use of the LEEIE within the system – reflecting how this will be co-ordinated within the DMS/VBMS; • Explaining the realism of managing HGVs away if incidents occur – including how this could be realised with typical travel times greater than the notification of incidents; and • How the Applicant will manage the scale of movements across the construction programme and across the various contractors.
8.8 Construction Worker Travel Plan (CWTP) (APP-609)	TRA_5.1	<p>Policing issues are not explicitly covered in the draft Construction Worker Travel Plan (CWTP) (APP-609), however the measures proposed within the CWTP will have implications for policing which need to be understood. The draft CTWP does not reflect the need for the Constabulary to be engaged in the management and monitoring of the CTWP. However, there could be residual actions that need the Constabulary to be involved in Community Policing initiatives to assist with reductions in transport related crime or help with proactive travel measures. Therefore, the Constabulary requests that the Applicant reviews the involvement of the Constabulary in the drafting and monitoring of the finalised CWTPs.</p>
	TRA_5.2	<p>The CTWP should promote and actively encourage safe and sensible travel behaviours and the respect for regulation. The draft document is weak on this front and should be strengthened prior to consent of the DCO.</p>
	TRA_5.3	<p>Measures for mitigation are listed in Section 4 of the draft CWTP. These are extensive and it is recommended the policing implications for these are understood. Specifically:</p> <ul style="list-style-type: none"> • Policing required for two new park and ride facilities which will both have 1,250 parking spaces; • Proposed road safety improvement schemes ; and • Fly parking control.
	TRA_5.4	<p>It is recommended that periodic reviews of measures are undertaken in consultation with the Constabulary to better understand policing implications. The Constabulary should be involved in reviewing and managing the CWTP to reflect community engagement and other parallel safety initiatives.</p>