



Sizewell C
DCO Written Representation
Part 1 – Written Representation Summary
Suffolk Constabulary

Contents

1	Written Representation Summary	3
1.1	Overview	3
1.2	Suffolk Constabulary Overview	4
1.3	Differences between Suffolk and Avon and Somerset	4
1.4	Community safety impacts from SZC	4
1.5	Concerns regarding the Applicant’s approach	5
1.6	Suffolk Constabulary Police Resource Assessment Methodology	5
1.7	Construction Traffic Based Community Safety and Policing Impacts.....	7
1.8	Mitigation Delivery and Monitoring.....	8
1.9	Summary	10

1 Written Representation Summary

1.1 Overview

1.1.1 This document forms Part 1 of the Written Representation ('WR') submitted by Suffolk Constabulary ('the Constabulary') regarding the Sizewell C (SZC) Development Consent Order (DCO) application. As indicated in the Constabulary's Relevant Representation (RR-1140) (September 2020), the Constabulary's WR comprises two substantive elements and a summary:

- **Part 1** - this document
- **Part 2** - contains the Policing Impact Assessment ('PIA') setting out the Constabulary's assessment of the likely community safety and associated policing impacts of SZC; and
- **Part 3** - provides collated comments on the assessment and acceptability of community safety impacts predicted in the SZC DCO submission documents.

1.1.2 The Constabulary holds no views as to the virtues of nuclear energy or the merits of SZC itself. In drafting the WR, 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 mitigated.

1.1.3 Throughout the pre-application process and in its Relevant Representation (RR-1140), the Constabulary has raised concerns with the Applicant about the adequacy of consideration afforded to community safety and policing matters. From the outset and throughout the process, the key concerns voiced by the Constabulary relate to:

- **Narrow scope of assessment:** the singular focus on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than considering 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 environment Statement (ES) (APP-195) have not been factored into the assessment of resulting community safety impacts.
- **Insufficient information regarding the range of potential transport impacts** likely to require a net additional police response.
- **Over reliance by the Applicant upon the perceived experience of the construction of Hinkley Point C ('HPC') project within the Avon and Somerset Police area to seek to predict community safety and policing impacts from the SZC project.**

1.1.4 The Constabulary has set out its position in relation to SZC in its Relevant Representation and WR and is engaging with the Applicant on the matters raised.

1.2 Suffolk Constabulary Overview

1.2.1 The Constabulary has responsibility for policing the county of Suffolk and has a mission to make Suffolk a safe place to live, work, visit and invest. The Constabulary uses its resources to protect its communities and prevent crime happening, with a particular focus on preventing harm and protecting the most vulnerable in our communities. 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 puts pressure across the organisation and has facilitated a shift towards Neighbourhood Policing.

1.3 Differences between Suffolk and Avon and Somerset

1.3.1 The Constabulary is concerned about the over reliance on the perceived experience of the construction of HPC within the Avon and Somerset Police area to predict community safety and policing impacts for SZC. Whilst the Constabulary acknowledges the importance of ‘learning lessons’ from HPC, there are key geographical and operational differences between the Constabulary and Avon and Somerset Police. The demographic profiles from each area are also different meaning that impacts resulting from demographic changes due to SZC are not likely to be the same as those experienced in relation to HPC.

1.3.2 Operationally the forces are very different, which is confirmed in 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.

1.4 Community safety impacts from SZC

1.4.1 Due to the nature and scale of SZC, including a long construction period and large non-home based (‘NHB’) construction workforce, it is likely to give rise to the following types of community safety impacts which will require policing involvement to mitigate:

- Substantial demographic changes (increased population and altered profile compared with the baseline situation) from the predicted construction workforce, resulting in changes in safety, crime, and welfare related incidents.
- Substantial traffic changes, including substantial volumes of AILs requiring police escort and other HGVs, construction traffic and workforce vehicles, together with proposed road infrastructure developments.

- Substantial changes in health and safety risks and the occurrence of protests/disturbances, resulting in additional emergency preparedness and incident response requirements (e.g. in relation to major accidents and disasters).

1.4.2 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). For policing 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.

1.4.3 As with all other policing areas in the Constabulary, Local Policing is at capacity and operating to the maximum level that current funding and resourcing allows. Any increase in demand needs to be met with additional resources, else the current service will be adversely impacted.

1.5 Concerns regarding the Applicant's approach

1.5.1 The Constabulary believes it is inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group ('SEAG') as the sole basis for assessing likely community safety and policing impacts from SZC. It is acknowledged that SEAG data provides useful contextual information. However, 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 SZC.

1.5.2 The Applicant has promoted the policing model adopted at HPC involving the use of an EDF funded 'Beat Team' based on site. 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 and integrated with the Constabulary's existing resources. Additionally, some of the net additional policing demand generated by SZC will need to be addressed by specialist resources outside of Local Policing teams.

1.5.3 The Applicant has placed substantial 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 is welcomed, it does not provide a robust means to prevent criminal acts, disorderly behaviour or anti-social behaviour. It will not provide a platform for information to be shared.

1.6 Suffolk Constabulary Police Resource Assessment Methodology

Population Based Policing Demand

1.6.1 To help address identified assessment gaps it was agreed between the Applicant and Suffolk Constabulary that the Constabulary, as subject matter experts for policing, should undertake an independent assessment of likely

community safety and associated policing resourcing impacts. The resulting Policing Impact Assessment (PIA) utilised projected SZC workforce and traffic data provided by the Applicant. Drafts of the PIA were shared with the Applicant. 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.

- 1.6.2 Community safety and policing impacts are predicted to occur during the construction phase of SZC due to factors including substantial demographic changes resulting from the predicted NHB construction workforce. The demographic profile of this workforce is likely to be significantly different from the demographic profile of Leiston and Suffolk as a whole.
- 1.6.3 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, 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, for example arrests and suspects, males are significantly more likely to be involved than females.
- 1.6.4 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.
- 1.6.5 The Applicant predicts that the majority of the NHB workforce (88%) will be male, and over two-thirds (67%) will be aged between 20 and 49. The population of Suffolk, by contrast, is significantly older with the majority (54%) aged 50 or above. 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.
- 1.6.6 In line with discussions with the Applicant, the Constabulary requests 1 FTE employee in circumstances where the resources required are less than 1.2 FTE. 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 Contact and Control Room (‘CCR’) have been included in the modelling, only the net increase in Local Policing resource requirements will be sought for mitigation.

Construction Traffic Based Policing Demand and Resourcing Implications

- 1.6.7 Due to the increased traffic on Suffolk’s road network during the construction of SZC there will be a need for additional roads policing.

1.6.8 The Constabulary has engaged with the Applicant 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 through its involvement, 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

Population Based Community Safety and Policing Impacts

1.6.9 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:** incidents may be handled by local officer resources but often also require county-wide specialist input. Any increase in demand needs to be met with additional resources, else the current service delivered will be adversely impacted upon.
- **Custody:** transport to and detainment of arrested persons in specific premises. Custody in Suffolk is a joint service shared with Norfolk Constabulary and these premises are referred to as Police Investigation Centres (PIC). Each PIC is staffed by police officers and staff, but due to the specialist nature of the work conducted, these resources need specific training. This means that the staff capable of working within a PIC are restricted; not all staff can work duties that fall within the PIC. In the event of a rise in arrests because of SZC, extra resources will be necessary to meet the increased demand created.
- **Contact and Control Room and Crime Co-ordination Centre:** the area that handles all calls and co-ordinates action taken by the Constabulary, including responding to emergency incidents. The Constabulary's CCR is operating at capacity and any increase in call volume will impact the Constabulary's ability to respond to 999 (emergency) and 101 (non-emergency) calls within the response times set by government. Calls generated by SZC will negatively impact the Constabulary's ability to meet targets and will 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.

1.7 Construction Traffic Based Community Safety and Policing Impacts

1.7.1 Information provided by the Applicant 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. 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.

1.7.2 The role of the Constabulary in respect of facilitating most AILs is to ensure compliance with applicable law and guidance. In exercising this duty, 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.

1.7.3 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. 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. Given the restricted widths in some sections of the A12 and B1122, frequent numbers of large AILs on those corridors could induce significant driver delays and frustration and bring about poor driver discipline. The Constabulary determines 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. The Applicant does not consider that all AILs should be escorted by the Police

1.8 Mitigation Delivery and Monitoring

1.8.1 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 SZC.

Local Policing

Resourcing Requirements

1.8.2 The net additional policing demand impacts need to be adequately mitigated. The Constabulary presents how the FTE resources required will be distributed

over the SNT and NRTs responsible for policing. This takes account of shift patterns, leave, training etc.

- 1.8.3 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 these policing areas.

Police Estate Requirements

- 1.8.4 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. The Estates team within the Constabulary will be available to work with the Applicant when delivering these solutions, to ensure that the facilities meet the standards required by the Constabulary.

Operational Delivery

- 1.8.5 Policing across Suffolk 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.
- 1.8.6 Resources cannot be diverted 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 Neighbourhood Response Team that covers Leiston.

Roads Policing

- 1.8.7 The implications of the governance and management of the AILs associated with the construction of SZC will require significant dedicated resources. The resource will be able to assist the Applicant in the efficient delivery of SZC whilst helping to achieve safe and efficient operation of the affected road network.
- 1.8.8 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’s resources.
- 1.8.9 The proposed solution is a dedicated specialist team to manage SZC’s AIL requirements. The team will be founded 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 would not facilitate those movements and those movements could be delayed whilst waiting for capacity in the RAPT team to move an AIL. The Constabulary will 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 SZC.

1.8.10 The management and co-ordination of the process relating to transport would be monitored and reviewed through the Transport Working Group and as such require the Constabulary to be represented on that group.

1.9 Summary

1.9.1 The concerns raised by the Constabulary remain unresolved. It is the Constabulary's view that the issues raised have resulted in gaps in the Applicant's assessment of likely significant effects on community safety and policing.