



Sizewell C
Response to the ExA’s First Written Questions
(ExQ1)
Suffolk Constabulary

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1 Response to the ExA’s First Written Questions

1.1 Overview

- 1.1.1 This document, submitted for Deadline 2 of the Examination, contains Suffolk Constabulary’s (‘the Constabulary’) responses to the Examining Authority’s (ExA) First Written Questions.

1.2 Suffolk Constabulary's Responses to the ExA's First Written Questions

ExQ1	Question to:	Question:	Suffolk Constabulary's Response:
Questions to the Constabulary			
CI.1.14	The Applicant, Suffolk Constabulary	<p>Community Safety The Suffolk Constabulary [RR-1140] express concern that important community safety and policing impacts raised during the pre-application consultation stage have yet to be addressed. Please advise what progress has been made between the parties in this regard.</p>	<p>The Constabulary's concerns regarding the approach adopted by the Applicant are detailed in full within the Constabulary's Written Representation, which comprises:</p> <ul style="list-style-type: none"> • Part 1 – Summary • Part 2 – Policing Impact Assessment (PIA) • Part 3 – Collated comments regarding the assessment and acceptability of community safety impacts as predicted by the Applicant in the published SZC DCO application. <p>In November 2020, prior to the ES Addendum being submitted, the Constabulary advised the Applicant 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> <p>To help address the Constabulary's concerns, which have been previously shared with the Applicant, 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 Applicant's actual assessment of likely effects on crime and policing, including EIA conclusions and proposed approach to mitigation, remains unchanged from the limited and narrow assessment provided in Chapter 9 – Socio-economics</p>

ExQ1	Question to:	Question:	Suffolk Constabulary's Response:
			<p>(paragraphs 9.7.216 – 9.7.320) of the submitted ES (APP-195).</p> <p>The Constabulary's major concerns therefore remain unresolved, as indicated in the Statement of Common Ground (SOCG) between the Constabulary and the Applicant submitted at Deadline 2. The Constabulary considers that there are significant gaps in the Applicant's assessment of likely significant effects on community safety and policing, discussed further within the Constabulary's Written Representation Part 3 - collated comments on submitted SZC DCO application.</p>
CI.1.15	The Applicant, Suffolk Constabulary	<p>Community Safety</p> <p>In light of the concerns raised by the Suffolk Constabulary in respect of what they describe as the narrowness of the assessment please advise what you have done to address this criticism, and what could be put in place to respond to these concerns.</p> <p>Please advise how you consider any appropriate mitigation could be delivered through the DCO in order to achieve a satisfactory level of community safety.</p>	<p>To help address 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. The resulting PIA utilised projected SZC workforce and traffic data provided by the Applicant. Drafts of this PIA were shared with the Applicant in August 2020 and November 2020 for review and to facilitate discussions around the preparation of an initial SOCG (as submitted at Examination Deadline 2).</p> <p>All feedback received from the Applicant was carefully considered and informed several refinements to the PIA, as described in Appendix A of Part 2 of the Constabulary's Written Representation.</p> <p>The Constabulary requires adequate, appropriate and effective mitigation, including resource funding, and associated monitoring to be secured within the terms of the DCO and associated Section 106 Agreement between the Applicant and relevant local planning authorities prior to the determination of the application for the SZC project. In particular, mitigation needs to include adequate financial contribution to ensure that additional police resource is available during the entire</p>

ExQ1	Question to:	Question:	Suffolk Constabulary's Response:
			<p>construction phase and that such resources are responsive to a fluctuating workforce to help ensure the avoidance of likely significant adverse community safety impacts and any other unacceptable community safety risks, including in relation to local policing and roads policing.</p> <p>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 Suffolk. 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 not be funded.</p>
CI.1.16	The Applicant, Suffolk Constabulary	<p>Community Safety</p> <p>(i) Please advise on the progress in developing the assessment of likely community safety impacts and policing impacts following the more detailed assessment of transport, staffing and demographic data.</p> <p>(ii) Is it intended to provide a copy of this assessment into the Examination?</p> <p>(iii) Is this assessment now agreed?</p>	<p>To help address 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. However, 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.</p> <p>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 2 of the Constabulary's Written Representation in order to evidence the Constabulary's strong views regarding:</p> <ul style="list-style-type: none"> • Community safety and policing impacts likely to arise from the SZC project

ExQ1	Question to:	Question:	Suffolk Constabulary's Response:
			<ul style="list-style-type: none"> • Why the Applicant's reliance upon data collated for the Hinkley Point C 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 Hinkley Point C project as the Applicant has proposed; and, • The need for effective mitigation and monitoring to be secured through the terms of any DCO granted and associated Section 106 Agreement for the SZC project. This mitigation solution must be adequate and appropriate for the SZC project in Suffolk.
HW.1.18	The Applicant, Suffolk Constabulary	<p>Community Safety From the [RR- 1140] it would appear you are working together on a Strategic Relationship Protocol (SRP). Assuming this is agreed, is this intended to form part of the examination and be delivered through the DCO or a separate side agreement between the parties?</p>	<p>As the SRP is not a legally binding document, nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary's response to calls for service. The Constabulary's focus during Examination is to secure adequate, appropriate and effective mitigation for the community of Suffolk through the terms of any DCO granted and an associated S106 Agreement.</p> <p>Given the lack of legal status, the Constabulary does not currently have strong views as to whether the SRP is a DCO requirement, a S106 planning obligation, or otherwise. The Constabulary will continue to work with the Applicant to establish how the two organisations can work together for the benefit of the existing Suffolk community and emerging community resulting from the SZC development</p>
HW.1.28	The Applicant, Network Rail, Suffolk Constabulary, East of England Ambulance	<p>Change Request No. 2 In the event the number of trains were to be increased, please explain what implications this may have for the operation of level crossings on</p>	<p>The Constabulary refer in the first instance to the response given to this question by Suffolk County Council (SCC).</p>

Suffolk Constabulary's Responses to the ExA's First Written Questions

ExQ1	Question to:	Question:	Suffolk Constabulary's Response:
	Service, Suffolk Fire and Rescue, SCC, ESC	the branch line and the main Ipswich to Lowestoft line and the effect on severance of communities or impacts on emergency services.	<p>The Constabulary is broadly supportive of measures that seek to reduce the volume of HGV movements but does have some concerns as to the impact on level crossing closures and the associated impact on police and other emergency service response times. The way in which policing is delivered across the county means that any additional waiting time at level crossings has the potential to impact on the response times of various policing units including roads and armed policing and dog units in addition to local emergency response units. Even additions short delays can have a significant impact on the Constabulary's ability to meet its response targets. The A1152 forms an important access route for significant parts of East Suffolk i.e. Bawdsey Peninsula, Bentwaters and Rendlesham and is thus particularly sensitive to any disruption.</p>