



**Sizewell C**  
**Comments on responses to the ExA's First**  
**Written Questions (ExQ1)**  
**Suffolk Constabulary**

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# **1 Comments on responses to the ExA's First Written Questions**

## **1.1 Overview**

- 1.1.1 This document, submitted for Deadline 3 of the Examination, contains Suffolk Constabulary's ('the Constabulary') comments on responses to the Examining Authority's (ExA) First Written Questions.

## 1.2 Suffolk Constabulary’s comments on the Applicant’s responses to the ExA’s First Written Questions

ExQ1	Question	The Applicant’s Response	Suffolk Constabulary’s Comments
<b>CI.1 Community Issues</b>			
CI.1.11	<p><b>Leiston</b></p> <p>The Town Council - express concern that the mitigation for impacts from a large influx of predominantly male workers has not been fully addressed, with the only specific mitigation proposed the sports facilities at the Academy. The concerns in respect of the potential community impacts are much broader than just the effects on sports provision.</p> <p>Please respond to these concerns and explain how the ES has considered the broader community effects of a large influx of largely male workers and what mitigation would be secured to address these community effects.</p>	<p>Leiston-cum-Sizewell Town Council’s representation [RR-0679] states:</p> <p><i>“Personnel movement into and out of the town to access services, leisure and businesses will put a lot of pressure on the amenity of local residents – particularly with housing, access to footpaths and social cohesion - it will also make huge changes to the current socio-economic activity. The effect on residents needs to be acknowledged and mitigated for”,</i></p> <p><i>and</i></p> <p><i>“The provision of sports facilities is welcome. Sport is not the only cultural or recreational activity in the town however and further mitigation in this area is requested. Especially as, during construction, the provided sports facilities, which are there for SZC workforce, would not be as readily accessible as maybe wished by residents. LTC has a positive and wide ranging mitigation proposal to offset this for both residents and workers families which would need SZC Co. support. It will be important to ensure robust community cohesion during the inevitable upheaval this project brings and it is intended to provide an oasis for families where this can be achieved at the Waterloo Centre”.</i></p> <p>SZC Co. recognises Leiston will experience temporary and permanent change as a result of the Sizewell C Project and has designed a package of mitigation measures which will proportionately focus on Leiston’s residents, workers and businesses, including generating a range of legacy benefits for Leiston’s future advantage.</p> <p>Volume 2, Chapter 9 (Socio-Economics) of the ES [APP-195] provides an assessment of the likely significant effects on public services and community facilities (paragraphs 9.7.159 to 9.7.210); crime, anti-social behaviour and policing (paragraphs 9.7.211 to 9.7.230); and community cohesion and integration (paragraphs 9.7.241 to 9.7.246) during the construction of the Sizewell C Project.</p> <p>Volume 2, Chapter 9 (Socio-Economics) of the ES [APP-195] provides an assessment of the likely significant effects on public services (paragraphs 9.7.280 to 9.7.281); and community cohesion and integration (paragraphs 9.7.282 to 9.7.284) during the operation of the Sizewell C Project.</p> <p>Volume 2, Chapter 9 (Socio-Economics) of the ES [APP-195] provides the mitigation proposed for the significant impacts of the Sizewell C Project. A wide range of embedded and additional mitigation is proposed to support the community during the construction and operation of the Sizewell C Project, including in relation to an increase in non-home based workers. The programme of mitigation includes:</p>	<p>Suffolk Constabulary acknowledges that whilst sports and such recreational facilities will address some of the needs of the SZC workforce, other forms of recreation and social activity will be sought within the Night-time Economy (NTE). Taking account of the predicted higher risk demographic profile of the NHB workforce and as effective management of the NTE does require substantial policing engagement, this will increase the net additional policing demands resulting from the Sizewell C (SZC) project.</p> <p>Through recent discussions with the Applicant and Avon &amp; Somerset Police (regarding the management of community safety at Hinkley Point C (HPC)) it is now clear that the proposed 'security vetting' relates only to ensuring compliance with nuclear site licensing and the suitability of personnel to undertake specific roles on the SZC site, rather than considering the potential for adverse community safety impacts from the workforce population, including crime risks, on off-site communities. Whilst the proposed security vetting is a welcome step, it needs to be understood that the level of vetting proposed may not itself preclude prospective workers with previous criminal convictions or otherwise posing potential community safety risks from becoming employed at SZC. It is also not possible for the Applicant to enforce a higher standard of security vetting, e.g. one which could ensure those with previous criminal convictions are not employed, as vetting requirements must be proportionate for the security and safety needs of individual roles. This limits the effectiveness of the Applicant's proposed vetting to materially act as a community safety mitigation measure.</p> <p>For the reasons detailed within Part 2 of Suffolk Constabulary's Written Representation (REP2-168), whilst the Applicant's Worker Code of Conduct is welcomed, this does not provide a robust means to either prevent or monitor criminality, disorderly behaviour or anti-social behaviour. Suffolk Constabulary will be unable to use the Code of Conduct to ascertain whether suspects or arrested persons are either directly or indirectly associated with SZC.</p> <p>Whilst reference to the Public Services Resilience Fund is welcomed, associated governance structures need to be robust and transparent whilst the ability to access funding in a timely manner in order to deploy effective mitigation 'on the ground' in response to community safety incidents will be essential. The Deed of Obligation document (S106) must include robust provisions to ensure adequate and effective mitigation and monitoring, including in relation to changes in workforce levels and community safety impacts as well as in relation to the adequacy and effectiveness of deployed mitigation.</p>

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		<ul style="list-style-type: none"> <li>• A temporary accommodation campus for construction workers, including facilities such as a gym, restaurant, bar and informal recreation activities, and welfare, contributing to reducing potential effects on public safety and emergency services (paragraphs 9.6.6 to 9.6.7);</li> <li>• A temporary caravan park for construction workers, designed to contribute to reducing potential effects on public safety and emergency services (paragraphs 9.6.8 and 9.6.9);</li> <li>• Permanent off-site sports facilities, in the form of a 3G pitch and two multi-use games areas at Alde Valley School in Leiston, providing facilities to respond to the likely rise in demand from the workforce as well as investment in facilities to make a positive contribution to integration and the experience of the workforce and local community. Measures would be built into the design to reduce safeguarding risks, such as physical and temporal segregation of use by workers and the community, and the school (paragraphs 9.6.12 to 9.6.15);</li> <li>• The Code of Construction Practice (CoCP) (Doc Ref 8.11(B)) will include a strategy for communication, community and stakeholder engagement, and community liaison activities, to address issues relating to community cohesion and integration that may arise from members of the public (paragraph 9.6.36);</li> <li>• A Worker Code of Conduct, Appendix 1.A.1 of the Community Safety Management Plan [APP-636], will be put in place to set required standards on behaviour both on and off-site, and includes the use of security vetting for potential workers (paragraphs 9.6.37 to 9.6.40);</li> <li>• Transport measures related to road safety include a Traffic Incident Management Plan (Doc Ref. 8.6(A)), Construction Traffic Management Plan (Doc Ref. 8.7(A)), and the Construction Worker Travel Plan (Doc Ref. 8.8(A)). These will be secured through an obligation in the Deed of Obligation (Doc Ref. 8.17(C)). These implementation strategies would contribute to a reduction in significance of potential effects on emergency services, which rely on local roads to respond to incidents (paragraphs 9.6.41 to 9.6.42);</li> <li>• Localised effects on the accommodation market, as a result of the influx of non-home based workers, will be managed by the Accommodation Strategy [APP-613] which contains measures to specifically target hard to reach and vulnerable groups that may experience difficulties accessing or retaining housing as a result of the Sizewell C Project's effects on the lower end of the private rented sector. The Housing Fund, secured through the Draft Deed of Obligation (Doc Ref. 8.17(C)), would be capable of delivering additional capacity and providing resilience in the build up to peak demand and during the peak, and may have the potential to leave a lasting legacy in terms of improvements to the existing housing stock (paragraphs 9.8.15 to 9.8.22);</li> <li>• To help manage the distribution of workers and avoid or reduce potential adverse effects on accommodation capacity in local areas in a responsive way, SZC Co. would work with partners to deliver and implement an Accommodation Management</li> </ul>	

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		<p>System, secured through the Deed of Obligation (Doc Ref. 8.17(C)) (paragraph 9.8.23 to 9.8.24);</p> <ul style="list-style-type: none"> <li>• An information management and database/portal would hold and manage information about the local accommodation market which can be used to provide contractors and workers with a means of finding the most suitable accommodation and location.</li> <li>• In addition, information would be provided to prospective or existing landlords that could help ensure they are providing accommodation that meets safety and quality standards. This would help to avoid the risk of landlords being unaware of rules and regulations that apply to letting property, or new providers entering the market with accommodation of an unacceptably low standard (paragraphs 9.8.25 to 9.8.31);</li> <li>• The Public Services Resilience Fund will be drawn on to expand education provision in locations with limited capacity where the net additional effect of the workforce exceeds education capacity. The Fund would be secured through Deed of Obligation (Doc Ref. 8.17(C)) (paragraphs 9.8.32 to 9.8.36);</li> <li>• The Public Services Resilience Fund would additionally be made available to respond to any residual effects of the Sizewell C Project on the provision of social services, alongside measures set out in the Accommodation Strategy (including the Housing Fund), the Community Safety Management Plan, and the Accommodation Management System (paragraphs 9.8.37 to 9.8.41);</li> <li>• The Community Safety Management Plan [APP-635] has been developed in collaboration with the Councils, emergency services and health stakeholders and includes appropriate means of monitoring and mitigating potential impacts relating to community safety, community cohesion, and the provision of policing, fire and rescue services (paragraphs 9.8.46 to 9.8.57); and</li> <li>• The Sizewell C Community Fund will be made available to fund schemes, measures and projects to help mitigate intangible, residual in-combination effects on local communities as a result of combined environmental effects, both perceived and real. The Community Fund will be secured through the Deed of Obligation (Doc Ref. 8.17(C)) (paragraphs 9.8.65 to 9.8.69).</li> </ul> <p>The Deed of Obligation (Doc Ref. 8.17(C)) will secure a number of these mitigation measures. Many of the measures, including the Public Services Contingency Fund and Housing Fund will be managed by a combination of East Suffolk Council, Suffolk County Council and/or other public service providers who will retain the statutory powers to direct resources in the most appropriate way. SZC Co. has undertaken extensive engagement with stakeholders across a wide range of issues and matters. The Draft Deed of Obligation (Doc Ref. 8.17(C)) provides the latest position generated through joint working, notably for reference:</p>	

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		<ul style="list-style-type: none"> <li>• Schedule 14 (paragraph 2.5) states that a ringfenced sum from the Sizewell C Community Fund will be applied solely for projects within the ward of Leiston, and “in particular Leiston-cum-Sizewell”. The Sizewell C Community Fund will be used to mitigate intangible and residual impacts of the Sizewell C Project on communities via grants for schemes, measures and projects which promote economic, social and environmental well-being and improvements to quality of life. This may include cultural or recreational activities tied to these principles.</li> <li>• Schedule 7 sets out the employment, skills, education and supply chain measures that will be delivered, including the Sizewell C Employment Outreach Initiatives which will focus on hard-to-reach groups and communities within Suffolk experiencing relative deprivation, and the Sizewell C Bursary Scheme which is aimed at supporting the removal of barriers to employment for local people, particularly in areas of relative deprivation. Together these mitigation measures aim to address social mobility in areas immediately close to the Sizewell C Project, notably in Leiston.</li> <li>• Schedule 8 sets out the localised heritage interventions that include payments towards the enhancement of heritage sites at Leiston Abbey.</li> <li>• Schedule 16 explains the Leiston Improvement Scheme for transport improvements which include walking, cycling and public realm interventions to enhance the built environment and sustainable accessibility in the area, including along Main Street, High Street, Cross Street, Sizewell Road, Valley Road, and near Leiston Library. The Leiston Transport Contribution will help pay for this work and the Leiston Working Group will oversee the Scheme.</li> <li>• Schedule 15 sets out details of the Tourism Fund, which is intended to mitigate potential impacts on tourism from the Sizewell C Project, and will be implemented to support areas where the benefits will be most greatly felt.</li> </ul>	
Cl.1.12	<p><b>Effect of the proposed development on the local population</b></p> <p>In light of the concerns expressed by the CCG [RR-0500] and the Suffolk Constabulary [RR 1140] amongst others please comment on whether you still regard the assumptions of impacts on the local community as conservative and fully assess the likely impacts. In responding please address the following:</p> <p>(i) Whether the increased workforce could be supported by existing GPs</p> <p>(ii) Whether the effect on housing availability has been underestimated;</p> <p>(iii) The potential for adverse effects on health workers capacity to do their work due to impacts on journey times;</p>	<p><b>Response to (i)</b></p> <p>The health needs of the NHB workforce have been internalised through occupational health care provision and therefore the increased workforce will not need to be supported by existing GPs. The scope of the occupational health provision is set out in Volume 2, Appendix 28A of the ES [APP-347] - this will replicate the provision that has proven so effective at Hinkley Point C, with minimal impact to local capacity due to the availability of GP, nursing and pharmacy services onsite. This provision is open to the entire workforce, thereby also offering health screening and care to HB staff, constituting complementary local health care.</p> <p>In addition, a residual referral rate has been assessed for the non-home-based workforce, and a residual healthcare contribution is proposed. This will include an amount for NHB workers' families. This is a conservative approach as those workers bringing families are likely to move into housing which other families vacate (i.e. offsetting existing</p>	<p>Suffolk Constabulary notes that whilst the Applicant's Community Impact Report (APP-156) identifies existing deprivation in Leiston this is not factored into the assessment of population dynamic or associated community safety impacts within Chapter 9 - Socio-economics of the Applicant's ES, Equality Statement (APP-158) or Community Safety Management Plan (APP-635). Leiston, together with other pockets within the Eastern Command Area and Halesworth Local Policing Command (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 Safer Neighbourhood Team (SNT), although effective local policing also relies on area based and county-wide policing resources.</p>

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	<p>(iv) Whether the equalities assessment adequately assesses effects on vulnerable groups;</p> <p>(v) Whether the mitigation for noise, dust, and impact on travel times has fully addressed health impacts; and</p> <p>(vi) Whether there has been a full assessment of the impacts on care homes and their residents.</p>	<p>residents and presenting little net health care demand or cost). Both the occupational health service (Sizewell Health) and the residual healthcare contribution will be secured in the Deed of Obligation, Schedule 6 (latest draft Doc Ref. 8.17(C)). On the above basis, the potential impact upon local health care capacity has been addressed.</p> <p><b>Response to (ii)</b></p> <p>The Relevant Representations referenced here raise the following concerns in terms of the effect related to housing:</p> <ul style="list-style-type: none"> <li>Concerns related to increased local housing turnover and the potential impact that this has on healthcare provision (i.e. unstable population creating GP registrations, but also healthcare infrastructure demands beyond this).</li> <li>Concerns about the net additionality of NHB worker households and the effect of that assumption in determining healthcare requirements.</li> </ul> <p>The assessment of effects on housing availability has not been underestimated. The assessment has four main components each with conservatism built in in order to assess likely significant effects and plan for mitigation that would be comprehensive and robust:</p> <ul style="list-style-type: none"> <li>Project assumptions about the scale, distribution and accommodation sectors used by the NHB workforce as described in appendices to Volume 2, Chapter 9 (Socioeconomics) of the ES [APP-196] reflect an assessment case workforce that is weighted towards NHB workers. Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] uses a conservative assessment case for assumptions about HB and NHB workers - this is to ensure mitigation for the NHB component is sufficiently robust. Some of the additional workforce (resulting from changing assumptions about the scale of workforce required as presented through Stage 2 and Stage 3 consultation) may be HB but the ES [APP-195] has taken a 'worst case' position with regards to knock-on effects on socio-economic factors.</li> <li>The baseline set out within Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] sets out a conservative assumption about the overall quantum of stock in the PRS and the tourist accommodation sectors – using data that most likely has since been updated to show an increase the supply of accommodation.</li> <li>The assessment of effects set out within Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] includes a number of conservative assumptions, including a focus on effects in the lower 30th percentiles of the PRS, and assumptions that discount availability and affordability of some tourist accommodation. It also assumes 100% additionality for the PRS – when in fact some homes would be already occupied by existing households.</li> </ul>	



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		<ul style="list-style-type: none"> <li>The approach to mitigation – set out within Volume 2, Chapter 9 (Socio-economics) of the ES [APP-195] and the Accommodation Strategy [APP-613] includes planning for uncertainty, flexible and responsive governance, and a Housing Fund that is able to fully mitigate the anticipated additional demand for PRS accommodation.</li> </ul> <p><b>Response to (iii)</b></p> <p>Potential changes in transport nature, flow and journey time, and the impacts these may have on local communities have been a key consideration in the design of the Sizewell C Project and associated development. The core assessment is contained within Volume 2, Chapter 10 (Transport) of the ES [APP-198] which addresses potential community severance, access and accessibility (including driver delay), and pedestrian fear and intimidation. Risk of accident and injury is set out within Volume 2, Chapter 28 (Health and Wellbeing) of the ES [APP-346].</p> <p>In relation to the potential delay to community health workers traveling to and attending patients at home, the potential delay during construction is minimal, measured in seconds per trip, and would not impact upon capacity, resourcing or programming of community care.</p> <p>Once operational, the new and enhanced transport infrastructure will remain, affording longstanding benefits to community care delivery, including improved road safety.</p> <p><b>Response to (iv)</b></p> <p>The Equality Statement [APP-158] is not formally the assessment of equality effects required under Section 149 of the Equality Act 2010, as the Public Sector Equality Duty cannot be delegated to the Applicant. Therefore, it provides information to assist the Examining Authority in carrying out their duty. The full range of potential equality effects relating to protected characteristics, including vulnerable groups, is properly identified in the statement, and summarised in Table 1.1 [APP-158].</p> <p><b>Response to (v)</b></p> <p>SZC Co. considers that the mitigation for noise, dust, and impact on travel times has fully addressed health impacts.</p> <p>Air quality has been assessed in terms of compliance with threshold objectives protective of health within the air quality assessment, and further investigated within Volume 2, Chapter 28 (Health and Wellbeing) of the ES [APP-346]. Emission concentration and exposure remain orders of magnitude lower than is required to quantify any measurable adverse community health outcome. On this basis, further</p>	

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		<p>health mitigation is not required, and monitoring remains focussed on environmental precursors to health outcome (facilitating intervention).</p> <p>The same is the case with noise, where the primary focus of the assessment was to minimise the magnitude and exposure to noise at a level that would again preclude any manifest health outcome. Mitigation follows the same premise, the Noise Mitigation Scheme (Doc Ref. 6.3 11H(A)), is geared to prevent any material risk to public health. No further mitigation is proposed for travel times, where the residual impact is measured in seconds and will not constitute a material impact on community care capacity, resources or programming.</p> <p><b>Response to (vi)</b></p> <p>The assessment of care homes and their residents is integrated into the relevant ES topic areas, including transport, noise and health and wellbeing, with signposting provided in the Equality Statement [APP-158], as part of the consideration of age as a protected characteristic (see Table A1.7 for a list of care homes).</p> <p>Care homes are treated as receptors of greatest sensitivity to traffic flow in the transport assessment, along with schools, colleges, playgrounds, accident clusters, urban/residential roads without footways that are used by pedestrians, and so - where applicable - will have been taken into account in the proposed approach to mitigation e.g. proposed highway improvements.</p> <p>The noise assessment identifies residual significant effects during the construction phase on Leiston Old Abbey Residential Home which is located close to the main development site. This is receptor 15 in Volume 2, Chapter 11 (Noise and Vibration) of the ES [APP-202]. This is likely to be addressed through an acoustic barrier around its northern boundary.</p> <p>Norwood House is assessed as receptor 4 for the Sizewell link road - see Volume 6, Chapter 4 (Noise and Vibration) of the ES [APP-451]. No significant adverse noise effects are predicted, although there will be a significant increase in traffic noise on the B1122 close to property in the early years before the construction of the Sizewell link road.</p> <p>Volume 2, Chapter 28 (Health and Wellbeing) of the ES [APP-346] has applied a consistently precautionary approach where every resident is considered highly sensitive to every health pathway. In this context, the assessment is working on the basis that every resident is sensitive to changes in noise, and means any impact other than minor would be considered significant. This thereby addresses the relative sensitivity to noise for a wide age demographic (children in schools through to senior residents at home and in care homes).</p>	
CI.1.14	The Suffolk Constabulary [RR-1140] express concern that important community safety and policing impacts raised during the pre-application consultation stage have	SZC Co. has worked with Suffolk Constabulary during the pre-application phase, and since submission of the DCO to fully assess the	Following dialogue with Suffolk Constabulary, the Applicant included additional baseline data regarding the Constabulary's workload within Section 2.4 – Socio-economics of the SZC ES

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	yet to be addressed. Please advise what progress has been made between the parties in this regard	<p>likely significant effects of the Sizewell C Project based on information available.</p> <p>A key concern of Suffolk Constabulary was the potential for non-crime incidents (as well as recorded crime) to result in additional demand for police resourcing. At paragraph 9.7.229 of Volume 2, Chapter 9 (Socio-Economics) of the ES [APP-195] it is noted that '<i>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</i>'.</p> <p>Following submission of the DCO, Suffolk Constabulary provided SZC Co. with information not previously in the public domain relating to non-crime incidents, and SZC Co. sourced non-crime (and reported crime) rates from HPC – this information was submitted in Volume 1, Chapter 2, section 2.4 of the ES Addendum [AS-181].</p> <p>SZC Co. has provided funding to Suffolk Constabulary to model potential crime and non-crime impacts in order to agree mitigation to be secured through the Deed of Obligation (latest draft Doc Ref. 8.17(C)). There are currently significant differences between SZC Co. and Suffolk Constabulary in the interpretation of the model, including the use of selected demographic characteristics, their weight and the evidential basis of additional demand as a result, especially when evidence from actual recorded crimes and incidents from Hinkley Point C is considered, but work is ongoing to address them.</p>	<p>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 their published impact assessment.</p> <p>The use of policing data collated by the HPC SEAG to predict community safety and policing impacts from SZC is not accepted by the Constabulary owing to known weaknesses with the HPC SEAG data (including under-reporting) and as 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 workers were involved. The Constabulary is therefore concerned regarding the 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. Please refer to Part 2 of the Constabulary's Written Representation (REP2-168) for further details regarding why it is inappropriate and unreliable to utilise HPC SEAG data to predict policing impacts from SZC in Suffolk.</p>
CI.1.15	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 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>Please see response to question CI.1.14.</p> <p>Community safety mitigation measures are set out in the Community Safety Management [APP-635].</p> <p>Table 5.1 [APP-635] sets out project mitigation measures contributing to community safety. These will be secured through a combination of measures as follows:</p> <ul style="list-style-type: none"> <li>• Security - Nuclear Site Licence and CoCP (Doc Ref 8.11(B)) (in turn secured by requirement (Project Wide 2: Code of Construction Practice.</li> <li>• On site fire and rescue capability - CoCP.</li> <li>• Emergency co-ordinator - CoCP.</li> <li>• Occupational Health Service – Deed of Obligation (Schedule 6) (Doc Ref. 8.17(C)).</li> <li>• Security vetting - Nuclear Site Licence.</li> <li>• Drug and alcohol testing - Nuclear Site Licence and through Occupational Health Service.</li> <li>• Provision of accommodation campus and caravan site - Implementation Plan (Doc Ref. 8.4I(A)), secured through the Deed of Obligation.</li> <li>• Sports and recreation facilities - on-site will be as for campus, off-site Deed of Obligation, Schedule 10.</li> </ul>	<p>It is noted and welcomed that the Applicant's response confirms that funding to support the emergency services will be made available through the Deed of Obligation. However, beyond the principle of funding being provided through a legal mechanism, to date the Applicant has not agreed the quantum or structure of additional resources (thus associated funding level) required within Suffolk Constabulary to mitigate the adverse impacts of SZC. Further, whilst reference to the Public Services Resilience Fund is welcomed, associated governance structures need to be robust and transparent whilst the ability to access funding in a timely manner in order to deploy effective mitigation 'on the ground' in response to community safety incidents will be essential. The Deed of Obligation document (S106) must include robust provisions to ensure adequate and effective mitigation and monitoring, including in relation to changes in workforce levels and community safety impacts as well as in relation to the adequacy and effectiveness of deployed mitigation.</p> <p>Through recent discussions with the Applicant and Avon &amp; Somerset Police (regarding the management of community safety at HPC) it is now clear that the proposed 'security vetting' relates only to ensuring compliance with nuclear site licencing and the suitability of personnel to undertake specific roles on the SZC site, rather than considering the potential for adverse community safety</p>

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
		<ul style="list-style-type: none"> <li>Accommodation Strategy – Deed of Obligation, Schedule 3.</li> <li>Transport mitigation measures - Implementation Plan and Deed of Obligation, Schedule 16.</li> <li>Employment, Skills and Training Strategy – Deed of Obligation, Schedule 7.</li> </ul> <p>Financial contributions to support community stakeholders will be secured in the Deed of Obligation (Doc Ref. 8.17(C)). This includes contributions to the emergency services (Schedule 4) and the Councils under the Public Services Resilience Fund (Schedule 5), which also provides for multi-agency use to allow cross working with health stakeholders and the emergency services. The Deed of Obligation also establishes the Community Safety Working Group which will work together over the construction phase of the project (Schedule 4).</p>	<p>impacts from the workforce population, including crime risks, on off-site communities. Whilst the proposed security vetting is a welcome step, it needs to be understood that the level of vetting proposed may not itself preclude prospective workers with previous criminal convictions or otherwise posing potential community safety risks from becoming employed at SZC. It is also not possible for the Applicant to enforce a higher standard of security vetting, e.g. one which could ensure those with previous criminal convictions are not employed, as vetting requirements must be proportionate for the security and safety needs of individual roles. This limits the effectiveness of the Applicant's proposed vetting to materially act as a community safety mitigation measure.</p>
CI.1.16	(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. (ii) Is it intended to provide a copy of this assessment into the Examination? (iii) Is this assessment now agreed?	<p>(i) The additional data has not changed SZC Co.'s assessment of likely community safety impacts. As set out in response to question CI.1.14, data from Hinkley Point C on non-crime incidents has informed this position. Also as set out in response to question CI.1.14, Sizewell C has funded Suffolk Constabulary to model potential crime and non-crime incidents relating to Sizewell C that would require mitigation. Suffolk Constabulary has shared the results with Sizewell C and SZC Co. is working to reach agreement on the interpretation of the results and the resultant resources that Suffolk Constabulary would require. At present SZC Co. believes the model is substantially over-estimating potential impacts when compared to observed impacts at Hinkley Point C.</p> <p>(ii) Volume 1, Chapter 2, section 2.4 of the ES Addendum [AS-181] provided an updated assessment by SZC Co. It is not currently proposed to provide a copy of the Suffolk Constabulary assessment into the examination as this is a collaborative process which has involved a number of exchanges of written information and discussions, rather than one single document. However, the outcome of this will be detailed in the Deed of Obligation (Doc Ref. 8.17(C)).</p> <p>(iii) The assessment is not yet agreed for the reasons set out in question CI.1.4 and (i) above. Discussions are ongoing.</p>	<p>Suffolk Constabulary's Relevant Representation (RR-1140) confirmed that it had been 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 Relevant Representation (RR-1140) also advised of the Constabulary's intention to submit this assessment of likely community safety and associated policing resourcing impacts as one part of Suffolk Constabulary's Written Representation (REP2-168); which has duly been undertaken.</p> <p>Suffolk Constabulary advised the Applicant in November 2020 that whilst the inclusion of additional baseline data within Section 2.4 – Socio-economics of the SZC ES Addendum (AS-181) would be welcome in terms of helping to contextualise the assessment of likely community safety impacts, in isolation this alone would not rectify identified deficiencies within their published impact assessment.</p>
<b>SE.1 Socio-economics</b>			
SE.1.1	<p><b>Accommodation Strategy</b></p> <p>As there appears to be the potential for both Sizewell B and the Proposed Development to be operating simultaneously:</p> <p>(i) are you able to explain how the outages at the respective plants would operate, and whether they would be co-ordinated or operate independently?</p> <p>(ii) Please explain the basis for the ES assessment in this regard and the different implications of the different scenarios.</p> <p>(iii) In the event that they might be co-ordinated-how would this be achieved</p>	<p><b>Response to (i) and (iii)</b></p> <p>Both Sizewell B and Sizewell C are pressurised water reactors which can only refuel when the plant is shutdown – this shutdown period is termed a refuelling outage. A refuelling outage occurs once every 18 months per reactor and lasts up to 2 months and involves taking apart the reactor components to replace depleted fuel. During a refuelling outage, components that cannot be accessed during its power cycle are inspected or replaced and tested, in addition statutory testing and routine maintenance is carried out. During this period over 10,000 separate activities are carried out at respective plants. These activities are planned two years in advance and involve contracts being awarded</p>	<p>If accommodation within the immediate vicinity of Sizewell B (SZB) and SZC, which is traditionally available for SZB outages, is used by the SZC NHB workforce, outage workers would need to seek accommodation within a wider area. This increases the area over which community safety issues are likely to arise from SZB and SZC in combination, including the risk of road traffic incidents, and increases corresponding mitigation requirements. Adopting a conservative approach, the base level police resource modelling prepared by Suffolk Constabulary (as detailed within Part 2 of the Constabulary's Written Representation (REP2-168)) has not accounted for potential additional in-combination effects related to SZB outages.</p>

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		<p>to numerous firms to assist and work in unison with the permanent staff.</p> <p>When the refuelling, maintenance and statutory work is complete, the plant is reassembled and tested to ensure it meets its safety, functional and operational requirements and then returned to service. The Office for Nuclear Regulation reviews the performance of outages and when satisfied with the performance and condition of the station, including the activities of the relevant independent insurance inspectors and Sizewell B's / C's internal Independent Nuclear Safety Assessors, will issue a licence instrument to allow the reactor to be re-started for a further 18 months' generation. The issue of the licence instrument concludes the Refuelling Outage and the plant returns back to full power generation.</p> <p>On occasion, component parts of the plant break down resulting in additional 24-hour maintenance activities. These so-called 'mini outages' or 'forced outages' are, where possible, planned for before they occur, reducing downtime and out of hours working. Work associated with mini outages and forced outages is normally limited to a small number of specialist staff and the relevant issue tends to be resolved in a relatively short period of time. Longer unplanned outages are rare but are sometimes necessary to ensure the safety of the public and workforce, and to ensure that the relevant repairs are of a permanent nature and meet or exceed all international standards for nuclear power generation.</p> <p>The outages at Sizewell B and Sizewell C would operate independently but co-ordination between the two power stations would be sought between the two power stations to try to stagger refuelling outages if possible.</p> <p>During the construction phase, some Sizewell C workers may move temporarily to Sizewell B during an outage, particularly those who have specialist skills. This could lead to a dip in accommodation demand from Sizewell C. In addition, Sizewell C would offer any spare campus or caravan site accommodation to Sizewell B outage workers (the latter will have a similar level of vetting to Sizewell C workers so there would be no security concerns in this respect).</p> <p>During the operational phase, Sizewell C refuelling outages will aim not to be concurrent with Sizewell B refuelling outages, for example through careful output management to enable the operating cycle to be planned to avoid a clash. It is normal working practice within the existing nuclear fleet to try to stagger outages so that key skilled teams are available for sites and not "double booked". However, SZC Co. cannot guarantee that Sizewell B and Sizewell C outages will not occur simultaneously, and this may occur due to either forced outages or delays during outages causing overlap.</p> <p>Currently Sizewell B is the only pressurised water reactor in the UK. However, this will increase to five with the addition of Hinkley Point C</p>	<p>Through recent discussions with the Applicant and Avon &amp; Somerset Police (regarding the management of community safety at HPC) it is now clear that the proposed 'security vetting' relates only to ensuring compliance with nuclear site licencing and the suitability of personnel to undertake specific roles on the SZC site, rather than considering the potential for adverse community safety impacts from the workforce population, including crime risks, on off-site communities. Whilst the proposed security vetting is a welcome step, it needs to be understood that the level of vetting proposed may not itself preclude prospective workers with previous criminal convictions or otherwise posing potential community safety risks from becoming employed at SZC. From discussions with the Applicant the Constabulary understands there is no intention to change the vetting process or level used at HPC in relation to SZC, indeed it is not possible for the Applicant to enforce a higher standard of security vetting, e.g. one which could ensure those with previous criminal convictions are not employed, as vetting requirements must be proportionate to the security and safety needs of individual roles. This limits the effectiveness of the Applicant's proposed vetting to materially act as a community safety mitigation measure.</p>

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		<p>(2) and Sizewell C (2). It is expected that more outage expertise will be developed nationally, with outage workers potentially residing within commuting distance of the Sizewell nuclear power station complex due to the 3 reactors there. Suffolk therefore has a substantial opportunity to benefit from leading the UK’s national skills and employment base in nuclear maintenance and safety.</p> <p><b>Response to (ii)</b></p> <p>Please see the response to question CI.1.5 in Part 3.</p>	
SE 1.5	<p><b>Economic Benefits</b></p> <p>The Economic Statement suggests [APP-610] there would be substantial economic benefits arising from the development. Please explain whether the experiences that arose from the development of the current and former nuclear power stations resulted in positive benefits. A number of RRs indicate that there has not been a long term benefit to the local area (RR-002, RR-008) how do you anticipate that this scheme could ensure a positive legacy in economic terms for the local area?</p>	<p>Sizewell B began construction in 1988 and started generating electricity in 1995. It provides 770 permanent jobs in the region, many of which are in high-skilled, high-output energy generation sectors, but others include administrative and entry-level jobs. Without the current and former nuclear power stations at Sizewell, these jobs would not exist. Analysis of the 2011 Census shows that of the jobs supported in Sizewell’s Workplace Zone (a statistical spatial definition including Sizewell campus and surrounding areas, but not including Leiston or other urban areas), 77% are taken by residents of Suffolk and nearly 300 by residents of Leiston, suggesting strong local retention of economic benefits during the operational phase of Sizewell B.</p> <p>While parts of Leiston remain within the most deprived areas of England and Wales, there is no evidence to suggest that a counterfactual position without the intervention of Sizewell B or Sizewell C would result in better or worse economic conditions locally or across the region. In the case of wider areas, any effect would be impossible to disentangle from the wider economy. A review of public datasets suggests that:</p> <ul style="list-style-type: none"> <li>• Claimant rates in East Suffolk have been consistently lower than the national average, with even lower rates in Leiston since the construction of Sizewell B.</li> <li>• East Suffolk has an occupational skill profile weighted more towards higher skilled occupations than the national average and has done in the past two Censuses (2001 and 2011), and a higher proportion of residents with higher level qualifications.</li> </ul> <p>A review of the socio-economic effects of construction of Sizewell B by Glasson and Chadwick summarises that:</p> <ul style="list-style-type: none"> <li>• Some policy measures were undertaken by Nuclear Electric and contractors at Sizewell B including recruitment of school-leavers to apprenticeships, setting up an on-site Jobs Centre and sponsorship of unemployed adults to undertake short training courses.</li> <li>• Unemployment rates in the local economy during the early 90’s recession were far lower than wider averages as a result of Sizewell B, and have not increased above average for the majority of the period since. Only a small minority of people</li> </ul>	<p>It is essential the Deed of Obligation document (S106) includes robust provisions to ensure adequate and effective mitigation and monitoring, including in relation to changes in workforce levels and community safety impacts (from those currently predicted) as well as in relation to the adequacy and effectiveness of deployed mitigation.</p> <p>Following discussions between Suffolk Constabulary and the Applicant, Part 2 of the Constabulary’s Written Representation (REP2-168) 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. Robust monitoring and adequate contingency arrangements therefore need to be in place through the Public Services Resilience Fund and the Community Safety Working Group to ensure Suffolk Constabulary has sufficient capacity to timeously address additional community safety risks should they materialise.</p> <p>From a governance perspective it is important Suffolk Constabulary is appropriately recognised as one of Suffolk’s key community stakeholders with a far reaching understanding of the community, including unique intelligence regarding socio-economic and transport issues. It is therefore imperative for the Constabulary to be adequately represented on all appropriate decision-making groups where monitoring and mitigation (including funding) to address community safety and transport impacts are addressed throughout the construction period.</p>

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
		<p>leaving the Sizewell B project at the end of construction were surveyed to have experienced lengthy periods of unemployment.</p> <ul style="list-style-type: none"> <li>• The Central Electricity Generating Board made grants available to local community projects, having spent £575,000 on 38 individual projects during the construction phase, over half of which were in Leiston.</li> <li>• Nuclear Electric provided £1.86m funding for the construction of Leiston Leisure Centre / swimming pool which opened in 1992.</li> </ul> <p>The Sizewell B public inquiry was held in the 1980s and - as set out above - the construction period ran from 1988-1995. It was almost 35 years ago that the design of the scheme and associated employment and economic benefits were appraised and tested. The permission did not include a comprehensive set of long-term commitments for sustainable economic, social and environmental change such as are proposed for the Sizewell C Project. There was limited focus on designing training and employment schemes, not least as the construction industry was structured very differently with respect to qualifications, competencies and the promotion of sustainable development.</p> <p>As the only pressurised water reactor to be built in the UK and the first (and only) new nuclear build of that era, the design of Sizewell B did not benefit from any learnings accrued from comparable projects; the Sizewell C Project has been designed with the benefit of learnings from a range of national precedents, notably Hinkley Point C. Sizewell B did not come forward as part of a co-ordinated and complementary plan for new nuclear development, nor did it benefit from NALEP support for the Energy Coast and a raft of energy infrastructure construction projects leading to agglomeration benefits and policy support for sustainable investment in skills and training.</p> <p>The Draft Deed of Obligation (Doc Ref. 8.17(C)) includes measures to provide resilience and long-term legacy to the areas likely to experience the most change as a result of the Sizewell C Project, such as Leiston. This includes a ring-fenced Community Fund, Housing Fund, Tourism Fund, physical investment in transport infrastructure and public rights of ways and cycleways and sports facilities in Leiston, as well as employment, skills and training investment set out above that will focus on areas, where it will provide the greatest social value.</p> <p>The Sizewell C Project will result in 900 more permanent jobs for the region, many in high-skilled, high-output sectors. The Economic Statement [APP-610] sets out further detail on economic benefits for Sizewell C - see Section 3.2 for headline benefits during the operational phase.</p>	

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
<b>TT.1 Traffic and Transport</b>			
TT.1.2	<p><b>Marine Freight Quantities</b> Table 2.1 [AS-280]. Indicate where the following are accounted for:</p> <ul style="list-style-type: none"> <li>(i) All Abnormal Indivisible Loads (AIL) arriving at the BLF and by road; and</li> <li>(ii) The permanent Hard Coastal Defence Feature (HCDF) rock armour said to be directly deposited by barges on the beach in paragraph 3.4.103 [AS-202]</li> </ul>	<ul style="list-style-type: none"> <li>(i) Table 2.1 of the Freight Management Strategy [AS-280] does not include the Abnormal Indivisible Loads (AILs) arriving either via the Beach Landing Facility or by road. Table 2.1 only summarises bulk material quantities. AILs are classified as equipment rather than bulk material quantities. Further details with regards to the forecast number of AILs via the BLF and road are provided in response to question TT.1.8 of this chapter.</li> <li>(ii) The permanent Hard Coastal Defence Feature (HCDF) rock armour is included in 'other' within Table 2.1 of the Freight Management Strategy [AS-280].</li> </ul>	Please refer to Suffolk Constabulary's comments on the responses to TT.1.8
TT.1.8	<p><b>Additional Marine Capacity - Permanent BLF</b> Does the revised design reduce the number of AIL that will need to travel by road? If so set out the original and revised numbers of AIL by:</p> <ul style="list-style-type: none"> <li>(i) By road each year and in total; and</li> <li>(ii) By sea each year and in total.</li> </ul>	<p>Information with regards to AILs by marine and road is set out in the updated Construction Traffic Management Plan (CTMP) (Doc. Ref. 8.7(A)).</p> <p>There are two types of AILs: permanent equipment needed for the power station (referred to as permanent equipment AILs), and temporary equipment needed for the construction of the main development site such as excavators, cranes etc (referred to as temporary construction AILs).</p> <p>The permanent BLF has been designed to accommodate the permanent equipment AILs. As set out in paragraph 3.3.25 of Volume 2, Chapter 3 of the ES [APP-184], it was estimated that annual campaign periods (approximately April to October) for a total of approximately 4 years would result in approximately 120 beach landings at the permanent BLF, with each barge accommodating an average of 1.5 permanent equipment AILs. The DCO design of the permanent BLF could therefore accommodate up to 180 permanent equipment AILs during the construction phase.</p> <p>At the time of the DCO submission, the engineering team were basing the permanent BLF design on a high-level estimate of the required permanent equipment AILs of 178. Since the DCO submission, further work has been undertaken to derive an accurate forecast of the permanent equipment AILs, which are now forecast to be 389. Therefore, the design of the permanent BLF was enhanced to accommodate the increased number of permanent equipment AILs. As set out in paragraph 2.2.64 of Volume 1, Chapter 2 of the ES Addendum [AS-181], it is estimated that annual campaign periods (approximately April to October) for a total of approximately 4 years would result in approximately 400 beach landings at the permanent BLF, with each barge accommodating an average of 1.5 permanent equipment AILs. The refined design of the permanent BLF has therefore been assessed to accommodate up to 600 AILs during the construction phase.</p> <p>With regards to the temporary construction AILs, as a worst case, these have all been assumed to be transported by road but SZC Co. will seek to utilise spare capacity within the enhanced permanent BLF to deliver some of the heavier / larger temporary construction AILs by sea aspects such as programme and weather allow.</p>	<p>The Applicant and Suffolk Constabulary have been in discussions regarding the quantum and frequency of AILs travelling to and from the SZC project. The Applicant has based its assessment on data derived from the Delivery Management Systems for HPC. Suffolk Constabulary has provided feedback on the apparent deficiencies in that data but has now reached an agreement about which data are reliable and which are not robust. The assessment of Suffolk Constabulary's resources required to manage those AIL movements and when those resources would be deployed is close to agreement between Suffolk Constabulary and the Applicant based on the HPC data, and reported by the Applicant as a worst case scenario, deliveries made to the BLF would reduce that demand. The Applicant does not state whether permanent AILS are expected to be delivered between October-April, when the BLF is stated to not be available or for periods between April and October when the BLF is not available due to unforeseen circumstances. While Suffolk Constabulary welcomes the BLF facility, no timeline has yet been given as to when the BLF will come online. If this is delayed, it is likely to require large AILs to be moved by road which will draw heavily on Suffolk Constabulary's resource modelling.</p> <p>The Applicant has not set out a process to agree the change of movement of the permanent AILs from the BLF to road. The Applicant is therefore cognisant that Suffolk Constabulary will derive its resources on that basis and that if the demand exceeds that requirement then standard resourcing protocols will be employed by Suffolk Constabulary, where AILs are managed on a business-as-usual basis with other hauliers.</p> <p>The Applicant has not currently committed to funding additional resources for Suffolk Constabulary associated with AIL management and other Roads Policing duties.</p> <p>The use of averaged numbered for movements is helpful, in this case the HPC data shows such variation between years that the use of averages is not a reliable mechanism for Suffolk Constabulary's resource planning. The data for HPC indicates significant variances in AIL movements and the Applicant has committed to seek to flatten the profile to allow better management and reduce the impacts on the network and resources.</p>



ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
		<p>The total number of temporary construction AILs for the whole construction phase is unknown at this stage but the most accurate data available is from Hinkley Point C for the construction to date. A breakdown of estimated temporary construction AIL two-way movements to/from the main development site is provided in the updated CTMP (Doc. Ref. 8.7(A)) and shows that there is expected to be an average of circa 1,400 AIL two-way movements per annum to/from the main development site. The majority (77% on average) of the temporary construction AIL movements are 3.5m wide or less. Based on a construction period of 12 years and the Hinkley Point C data, there is estimated to be circa 16,800 temporary construction AIL movements (i.e. in or out of the main development site) over the construction phase.</p> <p>In summary, the enhanced design of the permanent BLF could potentially reduce the number of AILs that will need to travel by road, if any spare capacity can be utilised for some of the largest/heaviest temporary construction AILs. However, for the purposes of providing a worst-case assessment of AIL movement by road within the CTMP (Doc Ref 8.7(A)), it has been assumed that only the permanent equipment AILs would be delivered via the permanent BLF and that all of the temporary construction AILs would be delivered by road.</p>	<p>It has already been stressed to the Applicant, and clearly articulated through the Written Representation (REP2-168), that Suffolk Constabulary does not have baseline resources dedicated to the movement of AILs. It is imperative that the Applicant's figures regarding the likely movements of AILs are accurate and consider the tolerances that the SZC programme can absorb if there is an increase in AIL numbers, as the solution being proposed by Suffolk Constabulary to facilitate the movements of AILs for the build of SZC will be predicated on the Applicant's data.</p> <p>Further to the quantum of AILs predicted by the Applicant, its Freight Management strategy does not include AILs. Suffolk Constabulary has been informed by the Applicant that AILs will not be directed via the FMF. This will impact on Suffolk Constabulary's ability to conduct early compliance checks with SZC AILs prior to escorting those loads to the Main Development Site. The Applicant should set out how those compliance checks will be carried out by Suffolk Constabulary in a safe environment.</p>
TT.1.18	<p><b>Freight Management Facility - Control of HGV Flows</b> Table 7.4 of the TA [AS-017], shows the arrival and departure pattern of HGVs at the Main Development Site. The FMF is intended to be in part used to regulate the flow of HGVs to the Main Development Site. Is it intended that HGVs would leave the FMF in convoys or individually?</p>	<p>HGVs will be released from the freight management facility individually rather than in convoy.</p>	<p>At 570 HGVs arrivals per day at peak and a peak of 71 HGVs in the busiest hour, this is approximately 1 lorry one-two minutes for much of the day, a near constant flow of vehicles leaving the FMF and arriving at the Main Development Site. Whilst this is a matter associated with network capacity and operations for Suffolk County Council (SCC) to consider, Suffolk Constabulary is concerned that poor management at the main site gate line could cause network safety problems. The Applicant has been asked to respond to how this will be mitigated simply through the Delivery Management System and to assure Suffolk Constabulary that safety will not be impeded. For example, will the Main Development Site gate be free flow or will final checks be carried out? Will the Applicant guarantee that there will not be queuing back onto B1122?</p>
TT.1.23	<p><b>Construction Traffic Management Plan (CTMP) - [APP-608], Traffic Incident Management Plan (TIMP) [APP-607], Construction Worker Travel Plan (CWTP)[APP-609] – Transport Review Group</b> The Transport Review Group membership, structure, roles and responsibilities is explained in the CTMP, the CWMP and the TIMP. The group consists of six members three appointed by SZC and three from other stakeholders. Notwithstanding information in the draft Section 106 [PDB-004], explain how the decisions will be made in this group if there is not a majority vote?</p>	<p>The experience at Hinkley Point C (which has an identical Transport Review Group (TRG) structure in the Section 106 agreement) has been positive. The TRG works collaboratively in order to ensure the efficient construction of the project and the effective mitigation of effects. The parties have common objectives and voting is not necessary. At Sizewell C the engagement over transport issues has been close and constructive and a similar approach to the TRG is anticipated.</p> <p>However, in the event that disputes arise which cannot be resolved within the TRG, the Deed of Obligation (Doc. Ref. 8.17(C)) contains clear provisions for governance. Schedule 16 (Transport) provides for disputes to be escalated to the Delivery Steering Group – which is a comparable structure to the governance provisions at Hinkley Point C. To date no issues have arisen at Hinkley Point C which could not be resolved within the governance structure.</p>	<p>Suffolk Constabulary wishes to be included within the constitution of the Transport Review Group (TRG) to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions.</p>

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		However, in the event of continuing unresolved disagreement, the dispute resolution provisions set out in section 8 of the Deed of Obligation could also be called upon.	
TT.1.29	<p><b>Construction Worker Travel Plan (CWTP) - [APP-609]</b> In the case of the CWTP explain the apparent anomaly of the total workforce on the main site of 1500 in Tables 3.1 and 3.2 for the early years mode of travel when in Plate 1.1 the chart shows a total workforce as high as 4000 at the end of construction of the Associated Development sites.</p>	<p>The workforce profile in Plate 1.1 of the Construction Worker Travel Plan (CWTP)(Doc Ref 8.8(A)) shows the total workforce profile for the construction phase, which is inclusive of the associated development construction workforce. It reaches around 4,000 workers towards the end of construction of the associated development sites.</p> <p>The early years assessment within the Consolidated Transport Assessment (Doc Ref 8.5(B)) is based on 1,500 construction workers travelling to the main development site (i.e. exclusive of associated development construction workers), which is expected to occur circa mid-Year 2. In addition to the 1,500 construction workers travelling to the main development site, the early years assessment includes a worst case assumption that all of the associated development sites will be constructed concurrently rather than phased, and assesses a total workforce of 730 workers constructing the associated development sites (i.e. a combined total of 2,230 construction workers for the construction of the main development site and associated development sites).</p> <p>The CWTP (Doc Ref 8.7(A)) sets out mode share targets for the early years and peak construction phases of the construction of the Project. The transport strategy for the construction workforce in the early years is based around the park and ride facility and caravan park at the LEEIE and an element of parking at the main development site, with parking permits and car sharing. The monitoring of mode share targets will move from the early years mode share to the peak construction phase mode share targets once the southern and/or northern park and ride facilities are operational. As set out in the updated Implementation Plan (Doc Ref 8.4I(A)), the southern park and ride facility is expected to be operational mid way through Year 2 of the construction phase. It is after this point that the main development site workforce is forecast to reach and start to exceed 1,500.</p> <p>Table 1.5 in Volume 2, Appendix 9A of the ES [APP-196] provides a breakdown of the construction workforce by year. It shows that mid-Year 2 there are estimated to be 1,410 construction workers at the main development site.</p>	Through on-going engagement with Avon and Somerset Police Constabulary, Suffolk Constabulary has been made aware of increased levels of traffic offences which are noted to be associated with the workforce at HPC. Suffolk Constabulary has therefore committed to the Applicant that, should the additional resources within the AIL unit, that would be funded by the Applicant, have residual time, then that time would be used for active and pro-active enforcement and complementary Roads Policing duties.
TT.1.32	<p><b>Abnormal Indivisible Loads (AIL)</b> A number of RR's express concern whether movement of AIL will hinder traffic movement and potential response times for emergency services in the area. Explain:</p> <p>(i) How many AIL movements are expected on a typical day in the early years in advance of the Sizewell Link Road being open;</p> <p>(ii) How traffic movement and emergency service access will be maintained during the early years prior to a suitable alternative route being available; and</p>	<p>The Construction Traffic Management Plan (CTMP) (Doc Ref 8.7(A)) has been updated to include further information on AIL movements. Please refer to response to Question TT.1.8 of this chapter, which sets out the two types of AILs. AIL movements by road are expected to be limited to temporary construction AILs.</p> <p>The total number of temporary construction AILs for the whole construction phase is unknown at this stage, however the most accurate data available is from Hinkley Point C for the construction to date. A breakdown of estimated temporary construction AIL two-way movements to/from the main development site is provided in the updated CTMP(Doc Ref 8.7(A)).</p>	<p>Suffolk Constabulary continues to engage with the Applicant on the specific details and controls set out within the outline CTMP, such as the AIL management matrix / matrices. Suffolk Constabulary is not yet able to agree to the outline CTMP as submitted.</p> <p>The Applicant has prepared network modelling to illustrate the effect of the project-based traffic on the A12 corridor, however, that evidence does not consider the impacts of slow and larger AIL movements and especially any residual effects into the peak period on the network following a movement along the corridor. The effects of AIL movements on the network is therefore not demonstrated in evidence before the Examination.</p>

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
	(iii) How many AIL's movement are expected on a typical day during peak construction and on the busiest days.	<p>(i) Data from 2017 for Hinkley Point C is the most accurate forecast of the level of AIL movements by road for the Sizewell C Project during the early years prior to the two-village bypass and Sizewell link road being operational. The data shows that there would be circa 2,055 AIL two-way movements to/from the main development site per annum during this phase, with an average of 6 AIL movements per day and a peak of 23 AIL movements in a day. Based on the 2017 data from Hinkley Point C there were 31 loads during the year that were &gt;5m wide and 12 loads during the year that were 4.4m-5m wide. Over 50% of the loads were &lt;3.5m.</p> <p>(ii) Please refer to the response to TT.1.28 of this chapter for the approach to managing AIL movements by road as well as (i) above, which provides the context of the types of loads expected.</p> <p>Based on discussions with Hinkley Point C, data from 2018-2020 for Hinkley Point C (summarised in the Sizewell C CTMP (Doc Ref 8.7(A)) is the most accurate forecast of the level of AIL movements by road for the Sizewell C Project during the peak construction phase once the two-village bypass and Sizewell link road are operational. The data over the three years has been averaged and shows that there would be circa 1,171 AIL twoway movements to/from the main development site per annum during the peak construction phase, with an average of 3 AIL movements per day and a peak of 26 AIL movements in a day. Based on the average of the 2018-2020 data from Hinkley Point C there were an average of 11 loads per year that were &gt;5m wide and 13 loads per year that were 4.4m-5m wide. 91% of the loads were &lt;3.5m.</p>	<p>In correspondence with Suffolk Constabulary, the Applicant has recognised the low quality of the data from 2017 and it is noted that there is no robust evidence available.</p> <p>As noted elsewhere in these responses, if the Applicant provides funding, Suffolk Constabulary will seek to establish an increased resource for AIL management to the level agreed with the Applicant. If that is insufficient for the Applicant's purposes, then the business-as-usual AIL unit will assist in line with current practice and availability.</p>
TT.1.34	<p><b>Transport Assessment (TA) - Cumulative Assessment with EA1 and EA2</b></p> <p>In the Table 26.2 of Chapter 26 of Environmental Statement (ES) for the East Anglia One North and Two Offshore Windfarm application it is identified that there may be a need for potential structural alterations to the existing bridge on the A12 at Marlesford to facilitate the movement of abnormal load vehicles over this bridge. Has this requirement:</p> <p>(i) Been considered as part of the Sizewell C project?</p> <p>(ii) If this was to be required how would construction work impact on traffic flows on the A12 at Marlesford?</p>	<p>(i) Suffolk County Council (SCC) has confirmed that the highway structures on the A12 between the A14 at Seven Hills and the B1122 have all been approved by SCC for Special Type General Order (STGO) Category 1, 2 and 3 loads and Construction and Use (C&amp;U) loads (i.e. loads below 150 tonnes). It is proposed to provide a permanent beach landing facility (BLF) to deliver the largest/heaviest AILs by sea. Given the existence of the Highways England heavy load route 100, which routes from Lowestoft Port to Sizewell, it is envisaged that any heavy loads not delivered via the permanent BLF would be delivered via the heavy load route. Therefore, structural alterations to the bridge on the A12 at Marlesford are not considered to be required for the Sizewell C Project.</p> <p>(ii) As set out in (i), structural alterations to the bridge on the A12 at Marlesford are not considered to be required.</p>	<p>The challenges to delivering AILs to Lowestoft due to wharf and quay constraints is noted by Suffolk Constabulary, however, this is not a policing issue but may affect the viable routing from Lowestoft.</p>
TT.1.36	<p><b>Fly Parking</b></p> <p>Fly parking if uncontrolled will potentially lead to several problems not least of which is modelled traffic flows being underestimated on some routes. Paragraph 13.3.2 of the TA Addendum [AS-266] states further work is ongoing about the management of fly parking. Explain how fly parking on the local highway network will be controlled, monitored, and enforced during the construction period.</p>	<p>The updated Construction Worker Travel Plan (CTWP) (Doc Ref 8.8(A)) sets out the proposed approach to control, monitor and enforce against fly parking. The CWTP is secured through the Deed of Obligation (Doc. Ref. 8.17(C)).</p> <p>In particular, SZC Co. will employ a fly parking patrol team to identify possible cases of fly parking. They will be both proactive by carrying out daily patrols as well as reactive by following up reports from local</p>	<p>Suffolk Constabulary would welcome a definition from the Applicant of the term "fly parking" in order to understand how it would be enforced by the Applicant through the Code of Conduct if there has been no traffic regulation broken or an offence committed. Suffolk Constabulary would also like clarity on how the Applicant's patrols will recognise "fly parking" by their workforce. It is understood that the Code of Conduct has not been enforced at HPC where there can be no breach of contract.</p>

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
		<p>residents to the Sizewell C community help line who believe Sizewell C construction workers may be fly parking.</p> <p>In addition to the fly parking team, Sizewell C buses will be fitted with an electronic reader to scan workers' security badges when boarding the park and ride and direct buses. The data will be compared against the data for workers entering the main development site in order to enforce the policy that workers assigned to a park and ride or direct bus service should not drive closer to the main development site and change onto another mode of transport. Workers who enter the site but did not board their allocated direct or park and ride bus would be deemed to have contravened that policy, and appropriate action would be taken, and the Transport Review Group notified.</p> <p>Workers will be provided with Driver Rules that must be adhered to. The Worker Code of Conduct will set out a disciplinary process relating to fly-parking. Where a worker's vehicle is proven to be fly-parking, SZC Co. will adopt a just and fair disciplinary process with escalation to higher levels of management at each stage. Ultimately this process could lead to the removal of an individual worker from the Sizewell C Project.</p> <p>Monitoring data from the fly parking team, supplemented by the bus and security gate data, will be used to report occurrences of fly parking per quarter to the Transport Review Group as well as action taken.</p>	<p>If "fly parking" is to be enforced by Suffolk Constabulary or under a decriminalised parking regime then a road traffic offence has to have been committed.</p> <p>Reports of the effects of obstruction or complaints from residents over parking are anticipated to be reported to Suffolk Constabulary in the first instance. Suffolk Constabulary will then need to deal with those complaints with other business-as-usual actions where other dedicated resources are not provided for.</p> <p>It is not clear how the Applicant will operate within the Data Protection Act to enact any alleged breaches of the Code of Conduct. The proposed approach to management of "fly parking" is therefore not viable.</p>
TT.1.39	<p><b>Transport Assessment (TA) - Scoping</b></p> <p>Paragraph 1.6.1 references extensive scoping discussions. Has there been a formal scoping process with the relevant Highways and Planning Authorities on development of the TA?</p> <p>If so, submit copy of agreed scoping report.</p>	<p>Section 6.3 of Volume 1, Appendix 6A (EIA Scoping Report) of the ES [APP-168] describes the Transport Assessment (TA) scope and methodology, addressing comments received from stakeholders on the 2014 EIA Scoping Report. The TA scope and methodology was refined through extensive discussions with Suffolk County Council (SCC), East Suffolk Council (ESC), including monthly Traffic and Transport Workgroup meetings attended by SCC, ESC, Highways England and the Suffolk Constabulary, and fortnightly transport modelling focused meetings with SCC, ESC and Highways England. TA scoping discussions considered the study area, assessment hours, traffic surveys, project trip demand and distribution, modelling methodology, assessment scenarios and years, forecast growth, committed schemes, transport strategy, embedded mitigation and impact assessment criteria.</p>	<p>Suffolk Constabulary was not consulted on the scope of the Transport Assessment. Suffolk Constabulary has raised comments on the Transport Assessment but has not received responses from the Applicant.</p>
TT.1.97	<p><b>Sizewell Link Road – Route for Abnormal Indivisible Loads (AIL)</b></p> <p>Figure 2.4 [APP-449] suggest that AIL will use the Middleton Moor Link road to access the Sizewell Link Road. Explain:</p> <p>(i) Why they will not use the whole length of the Sizewell Link Road; and</p> <p>(ii) Will the new roundabout on the B1122 be designed to accommodate AIL?</p>	<p>(i) AILs to/from the A12 south will use the whole length of the Sizewell link road. AILs to/from the A12 north will use the A12/B1122 roundabout at Yoxford and the Middleton Moor link to access the Sizewell link road in order to avoid the need for AILs to travel along the A12 through Yoxford.</p> <p>(ii) Yes, the A12/B1122 roundabout design accommodates AIL movements.</p>	<p>The Applicant is reminded that Suffolk Constabulary's assistance will be required when AILs are required to contravene traffic regulations - which can include instances with AILs moving through the new junctions and link roads. Suffolk Constabulary will review the design criteria; dimensions; proposed operations; and constraints when considering a proposed adjusted AIL Management matrix for the "post-mitigation" position, which is proposed to be submitted by the Applicant following Deadline 3. The Constabulary will commit resources in accordance with agreements with the Applicant. This may be through business-as-usual operations or if dedicated additional resources have been funded.</p>

ExQ1	Question	The Applicant's Response	Suffolk Constabulary's Comments
			It should be noted by the Applicant and SCC that the proposed road layouts and the associated altered junctions on A12 and B1122 could impact on the management of AILs not associated with SZC. This could impact on the business-as-usual operations of AILs and reduce the availability of that resource to respond to SZC's requirements.

### 1.3 Suffolk Constabulary's comments on East Suffolk Council's responses to the ExA's First Written Questions

ExQ1	Question	East Suffolk Council's Response	Suffolk Constabulary's Comments
<b>Cl.1 Community Issues</b>			
Cl.1.11	<p><b>Leiston</b></p> <p>The Town Council - express concern that the mitigation for impacts from a large influx of predominantly male workers has not been fully addressed, with the only specific mitigation proposed the sports facilities at the Academy. The concerns in respect of the potential community impacts are much broader than just the effects on sports provision.</p> <p>Please respond to these concerns and explain how the ES has considered the broader community effects of a large influx of largely male workers and what mitigation would be secured to address these community effects.</p>	<p>A number of these concerns will be addressed through the Community Safety theme of the Section 106 agreement which covers:</p> <ul style="list-style-type: none"> <li>a) community safety initiatives with the aim of reducing crime and disorder and anti-social behaviour;</li> <li>b) safeguarding initiatives;</li> <li>c) initiatives that promote community cohesion and wellbeing;</li> <li>d) community health/wellbeing (including mental and sexual health) services and initiatives;</li> <li>e) initiatives with the aim of protecting vulnerable people against violence (e.g. gang violence), domestic abuse, and exploitation (e.g. trafficking, prostitution and modern slavery);</li> <li>f) initiatives with the aim of raising awareness of and promoting the safe use of drugs and alcohol; and</li> <li>g) initiatives with the aim of promoting road safety,</li> </ul> <p>There will also be the opportunity for specific projects led by the voluntary sector and community organisations to be funded through the Community Fund.</p> <p>Through the S.106 mitigation measures, ESC also recognises the impact and issues that will be created through an influx of 5,900 NHB workers into East Suffolk and surrounding areas, with a particular impact on the Leiston community, where the local population will increase by 48% during the peak construction period, which will radically change the demographic of this town particularly and other towns and surrounding areas across East Suffolk. The East Suffolk CSP is proposing a number of mitigating measures to address the risk effects of the projected influx of NHB workers and provide support to the workers and local community to diffuse the potential tension in the area including – bolstering local Voluntary Community Social Enterprise groups to provide activities and support. Re-introducing successful schemes including pubwatch, Nightsafe and Town pastor schemes and bolstering existing schemes to promote responsible drinking, reduce risks and fears experienced by communities and to support vulnerable people in terms of the night-time economy. Training will be provided to local communities including publicans in conflict management.</p> <p>Raising awareness provides necessary information in relation to the likely risks and effects and mitigating actions and measures to enable communities to stay safe. Provision of information packs and support to arriving workers to enable them to settle within the local community. Provision community events and activities to facilitate community cohesion and alleviate any potential tension between the Sizewell C workers and the local community.</p>	<p>Suffolk Constabulary works closely with East Suffolk Council (ESC) and other key partners to address community safety, crime prevention and policing issues in an integrated, efficient and effective manner. The Constabulary notes that the Local Impact Report submitted by ESC (REP1-045) identifies a wide range of likely community safety impacts and succinctly defines the organisations and associated roles required to effectively manage and mitigate impacts from substantial demographic change during the SZC construction period. Suffolk Constabulary's main role in addressing community safety impacts will be focused on crime deterrence, emergency response (including multi-agency co-ordination role), enforcement (including investigations) and community reassurance. This is distinct from prevention, awareness raising and wider incident response roles of non-emergency services. Suffolk Constabulary and ESC there have distinct but complimentary mitigation requirements to address the net additional community safety impacts arising from the SZC project.</p> <p>Suffolk Constabulary supports the view that a dedicated team of Community Liaison Officers will be required (alongside other proposed mitigation) to help minimise potential community tensions and to ensure that mitigation provided through public and emergency services functions efficiently and effectively.</p>

ExQ1	Question	East Suffolk Council's Response	Suffolk Constabulary's Comments
		It is essential that the CSP mitigation measures and support to be provided through the CSP is secured through the s.106 support to recruit the Community Liaisons officers to work on behalf of the CSP to work closely with local communities to encourage reporting of impacts and issues, provide support and make referrals to local agencies to take the necessary action to promote community cohesion across local communities through a range of planned and proposed measures and actions. Regular monitoring of issues and impacts and working with local communities will ensure the appropriate reporting of issues and the appropriate action and address through the CSP and relevant partner or agency. Further detail in Chapter 28 of the LIR [REP1-045].	
<b>TT.1 Traffic and Transport</b>			
TT.1.36	<b>Fly Parking</b> Fly parking if uncontrolled will potentially lead to several problems not least of which is modelled traffic flows being underestimated on some routes. Paragraph 13.3.2 of the TA Addendum [AS-266] states further work is ongoing about the management of fly parking. Explain how fly parking on the local highway network will be controlled, monitored, and enforced during the construction period.	ESC is more concerned with fly parking arising that is not on the local highway network therefore resulting in planning enforcement being required that is the responsibility of ESC. This is covered in further detail in the LIR [REP1-045].	No further comment on "fly parking".

#### 1.4 Suffolk Constabulary’s comments on Suffolk County Council’s responses to the ExA’s First Written Questions

ExQ1	Question	Suffolk County Council’s Response	Suffolk Constabulary’s Comments
<b>SE.1 Socio-economics</b>			
SE.1.0	<p><b>Assessment of Socio-Economic Effects</b></p> <p>The NPS at paragraph 5.12.3 sets out what an assessment of socio-economic affects should cover. Are there any shortcomings within the assessment that require further assessment or clarification?</p>	<p>SCC considers that the requirements of the NPS is appropriate. However, there are shortcomings in the assessment the applicant has produced.</p> <p>In the cumulative assessment against other significant construction projects in the region. Within this project the very basic methodology used for cumulative labour market impacts does not take into account the different skill sets needed to deliver at particular phases of the project and only concentrates on construction labour. See LIR [REP1-045] para 32.44-32.45, as well as para 25.15.</p> <p>Information gaps have persisted throughout consultation stages and in the final submission. These include:</p> <ul style="list-style-type: none"> <li>• Evidence of the impact of and resulting mitigation proposals for the increase of workforce number to 8,500.</li> <li>• Clear definition of “home based worker”.</li> <li>• Clear definition of a “worker”.</li> <li>• Clear definition of a “local business”.</li> </ul> <p>We note that the lack of clarity on the definitions was highlighted as a shortcoming in the Hinkley Point C monitoring in the Oxford Brookes Study commissioned by the New Nuclear Authorities Group (See table 32 in the LIR [REP1-045] and LIR Appendix 2:1 [REP1-089]).</p> <p>It therefore is imperative to seek the missing information above and have an additional focus on positive provisions and legacy benefits.</p>	<p>Suffolk Constabulary agrees with Suffolk County Council (SCC) that there are gaps in the Applicant's published assessment of impacts resulting from the influx of the NHB construction workforce. With reference to the fourth bullet point under 5.12.3, whilst the Applicant has presented a quantitative assessment of population dynamic effects this has not been factored into their assessment of resulting community safety impacts and consequently the identification of required mitigation (i.e. resulting from higher risk demographic profile and concentration of NBH construction workforce in a rural community).</p> <p>As highlighted within Suffolk Constabulary's Written Representation (REP2-168), the influx of a predominantly male workforce into a County recognised as being ‘rural’ by the Home Office and in an area (Leiston) recognised as facing deprivation will have profound consequences for the management of community safety issues and associated policing requirements.</p> <p>The impact assessment also fails to properly recognise that the primary receptor is the impacted population (including SZC workforce and associated families) itself, rather than public and emergency services who will need to perform a key mitigation role to prevent, minimise and address community safety impacts when incidents (i.e. impacts on or affecting the population as the primary receptor) occur. Public and emergency services including Suffolk Constabulary therefore need to have sufficient resourcing and associated funding to address the substantial net additional community safety impacts of the SZC project without causing an unacceptable deterioration of existing service levels to Suffolk's communities.</p> <p>Please refer to Part 3 of Suffolk Constabulary's Written Representation (REP2-168) for further comments regarding identified deficiencies within the Applicant's published impact assessment.</p>
<b>TT.1 Traffic and Transport</b>			
TT.1.23	<p><b>Construction Traffic Management Plan (CTMP) - [APP-608], Traffic Incident Management Plan (TIMP) [APP-607], Construction Worker Travel Plan (CWTP)[APP-609] – Transport Review Group</b></p> <p>The Transport Review Group membership, structure, roles and responsibilities is explained in the CTMP, the CWMP and the TIMP. The group consists of six members three appointed by SZC and three from other stakeholders. Notwithstanding information in the draft Section 106 [PDB-004], explain how</p>	<p>The Transport Review Group can in cases of dispute refer these to the Delivery Steering Group for resolution ([PDB-004] Schedule 17) and ultimately Clause 6 of the Deed within the s106 [PDB-004] enables resolution of disputes for example if no majority decision is reached by the TRG members. SCC notes that this process takes time (as yet not defined within the s106) reducing the responsiveness of the group and that Highways England are not party to the s106. While it is accepted that the group would aim to reach consensus in its decision making, and while the arbitration route is seen as appropriate to resolve disputes, SCC proposes for Suffolk County Council (as the local</p>	<p>Suffolk Constabulary wishes to be included within the constitution of the TRG to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions.</p>



ExQ1	Question	Suffolk County Council’s Response	Suffolk Constabulary’s Comments
	the decisions will be made in this group if there is not a majority vote?	Highway Authority) to chair the group, and that the Chair would have the casting vote. Further work is required to detail procedures and terms of reference to give clarity to the decision-making process to avoid ambiguity that could lead to split or bipartisan decisions. The key will be the independence of the Transport Co-ordinator from the Applicant’s delivery team. While appointed by the Applicant, there is no requirement for the postholder to be an employee ([APP-608] section 2.3.1). SCC also proposes a proxy voting arrangement in the group’s constitutional arrangements, so that if one of the “other stakeholders” (not appointed by the Applicant) referred to in the question above does not attend a meeting, one of the attendees can vote as a proxy.	
TT.1.36	<b>Fly Parking</b> Fly parking if uncontrolled will potentially lead to several problems not least of which is modelled traffic flows being underestimated on some routes. Paragraph 13.3.2 of the TA Addendum [AS-266] states further work is ongoing about the management of fly parking. Explain how fly parking on the local highway network will be controlled, monitored, and enforced during the construction period.	The Applicant sets out that: a) one aim of the CWTP is to transport a significant number of staff by bus and to try to ensure that this occurs. Staff will be allocated a bus to travel to/from the site and an electronic reader will be installed on each bus which will compare those staff that arrive at the main development site with those travelling by bus; this will be checked to ensure that staff are using the correct method of travel to/from the site reducing the likelihood of fly parking. b) Any staff living within the ‘drive to site catchment’ (i.e. inside the area bounded by the A12, River Blyth, and River Deben, excluding Leiston) and who are allocated a permit will be able to drive directly to site reducing the likelihood of them needing to park off-site, and therefore of fly parking. c) As a commitment within the Construction Worker Travel Plan, the Applicant will employ a fly parking patrol team ([APP-609] section 4.7.8) to carry out daily patrols to identify possible cases of fly parking; this will reflect reports by local residents who are concerned about fly parking in their area. Enforcement associated with fly parking is proposed to be undertaken through the ‘Worker Code of Conduct’, which can result in an individual worker being removed from the project depending on the number of breaches. SCC understands that this process has been relatively successful at Hinkley Point C both in identifying fly parking and reducing fly parking, as well as showing that a number of cases of reported sly parking related to legitimate worker parking; however, it is also recognised that the process may need to be amended through the TRG to reflect specific local circumstances or to be more effective as stated in the CWTP ([APP-609] section 6.4.3). Monitoring will be key to allow for early reactive measures if fly parking does occur.	Please refer to Suffolk Constabulary's comments on the responses to TT.1.36
TT.1.48	<b>Transport Assessment (TA) - Modelling Approach</b> Are you satisfied with the strategic modelling scope and approach outlined in Section 6 of the Transport Assessment?	The modelling approach which is set out within the Transport Assessment Addendum [AS266] is considered to be acceptable (although we have not reached agreement on the visitor car share factors used and this will be covered in the Statement of Common Ground) subject to relevant caps, monitoring, enforcement and controls on the assessed vehicle movements, as set out in the LIR (LIR Annex M [REP1-058]), and in previous responses, including SCC’s Relevant Representation [RR-1174], and to pre-submission consultations. However, whilst the method of assessment is acceptable, the conclusions on the traffic impacts have yet to be agreed.	Suffolk Constabulary notes the response from SCC on the detail of the Transport Planning modelling. Suffolk Constabulary has viewed output videos from the peak hour modelling of A12, which incorporated mitigation proposed as part of the Brightwell Lakes development. Those models indicated only moderate delays along the A12 corridor during those selected periods but did not appraise the effects on the network of the movement of AILs or the residual effects of those movements on the peak hours. This point has been raised with the Applicant.

ExQ1	Question	Suffolk County Council's Response	Suffolk Constabulary's Comments
TT.1.84	<p><b>Transport Assessment Addendum - Road Traffic Collision Forecasts</b></p> <p>Section 10.2 sets out the Applicant's approach to assessment of future road traffic collisions. Do you agree with the assessment approach used and also in general where they suggest improvements these are required?</p>	<p>The assessment method is considered by SCC to be acceptable, and those locations identified are considered to be reasonable given the road collision histories and relevant modelling. However, road collisions will need to be monitored through the Transport Review Group to identify any potential unforeseen issues. In particular, given the modelled operation of the B1078/B1079 junction, SCC considers the works proposed by the Applicant here to be necessary and continued operation of the junction needs to be reviewed.</p>	<p>Suffolk Constabulary is not part of the TRG and will therefore not be party to reviews of collisions. It proposed by Suffolk Constabulary that it is included within the constitution of the TRG to allow fuller and more succinct review and management of Roads Policing aspects of the SZC project. This could include the detailed planning of temporary roads interventions.</p>