Your Ref: EN010012
Our Ref: 20026016

02 July 2021

Wendy McKay
The Planning Inspectorate
National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

**BY EMAIL ONLY**

Dear Wendy,

**SIZEWELL C PROJECT**
**ADDITIONAL SUBMISSION**

Stantec acts for Suffolk Constabulary ("the Constabulary") in relation to the application for the Sizewell C Development Consent Order.

Further to the Constabulary's Deadline 3 submission, I am pleased to enclose the following document to aid the Examination. I trust that the Examining Authority will exercise their discretion to accept this submission.

**Updated revisions to submitted documents:**

The Constabulary submits into the Examination the following updated revisions to submitted documents:

| Document Reference | Revision (July 2021) | Document Name | Description for Submission |
|---|---|---|---|
| REP2-168 | 2 | **Written Representation Part 2 – Policing Impact Assessment (PIA)** | The PIA has been updated to correct data errors presented in Revision 1 of the PIA (submitted on 2 June 2021 for Examination Deadline 2).<br><br>The changes in Revision 2 of the PIA are:<br>• Tables 6.2 to 6.4 – updated where victim data was previously displayed under the 'non-crime header'; |

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| Document Reference | Revision (July 2021) | Document Name | Description for Submission |
|---|---|---|---|
| | | | • Paragraph 7.2.9 – inserted to explain reporting of annual average figures and modelling on bi-annual recruitment; and<br>• Table 7.2 – updated to reflect the latest impact model data.<br>• Table 9.1 – data corrections.<br><br>These changes **do not** change the assessment or conclusions reported in Revision 1 of the PIA. |

## Initial Comments on Draft Deed of Obligation

The document provides comments on the draft deed of obligation, highlighting initial key concerns and observations from the Suffolk Constabulary.

## Issue Specific Hearings

The Constabulary has reviewed the detailed agendas for the Issue Specific Hearings and would like to make the following comments:

- Issue Specific Hearing 1 – the agenda refers to Stantec as being an Interested Party that the Examination Authority wishes to hear from. Please note that on matters concerning the draft DCO and section 106 agreements, representations will be made by the Constabulary and their legal advisors Gowlings WLG.
- Issue Specific Hearing 3 – the agenda does not list the Constabulary as an Interested Party that the Examining Authority wises to hear from. As noted in their Deadline 3 response, the Constabulary wishes to attend and be heard orally at this hearing.

In addition to the log-in details provided in the Constabulary's Deadline 3 response, could log-in details also be provided to the following via a Microsoft Teams Calendar Invite:

- VC-LMH-3rdFloor@norfolk.pnn.police.uk
- [redacted]@suffolk.police.uk

If you have any questions or clarifications, please do not hesitate to contact me or Emma-Mai Eshelby [redacted]@stantec.com).

Yours sincerely,

[redacted]

Natalie Maletras
Director
on behalf of Stantec UK Ltd

# Updated Written Representation Part 2 - Policing Impact Assessment (clean)

# Sizewell C
## DCO Written Representation

## Part 2 – SZC Policing Impact Assessment

## Suffolk Constabulary

# Contents

## Appendices

# 1 Introduction

## 1.1 Introduction

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

1.1.2 The Constabulary's WR comprises three elements:

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

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

## 1.2 Purpose and Objectives

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

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

- Secure adequate and appropriate mitigation, including additional police resourcing, to avoid likely significant adverse community safety impacts and any other unacceptable community safety risks, including in relation to both local policing and roads policing. The cost of providing adequate additional police resourcing to help mitigate community safety impacts from the SZC project should not be borne by existing taxpayers in Suffolk[1].

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

## 1.3 Summary of Suffolk Constabulary Concerns

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

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

- Narrow scope of assessment - the singular focus of the small policing impact assessment on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than assessing wider community safety impacts likely to require police involvement.

- Limited consideration of demographic factors – the assessment of population dynamics undertaken in Chapter 9 – Socio-economics of the Environmental Statement ('ES') does not appear to have been factored into the assessment of resulting community safety impacts.

- Over reliance by the Applicant upon the perceived experience of the construction of Hinkley Point C ('HPC') project within the Avon and

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

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

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

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

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

## 1.4 Need for and Preparation of this PIA

### Need

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

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

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

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

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

### Preparation including Engagement with the Applicant

1.4.4 The Constabulary has engaged with the Applicant throughout all pre-application and pre-Examination stages of consultation and continues to do so, including through topic-based meetings and written requests for clarifications. The Constabulary has also participated in meetings of the Emergency Service Working Group and Community Forum convened by the Applicant and has maintained regular dialogue with other consultees concerned with the management of community safety impacts. These engagement activities have informed the Constabulary's assessment of likely community safety and policing impacts and the need for adequate mitigation to be secured, as set out in this PIA.

1.4.5 Previous drafts of the PIA which now forms part of the Constabulary's WR were shared with the Applicant for review and to facilitate discussions around the preparation of an initial SoCG (as submitted at Examination Deadline 2). All feedback received from the Applicant was carefully considered and informed several refinements to the Constabulary's PIA as described in Appendix A.

## 1.5 Requests of the DCO Examining Authority

1.5.1 At the time of submission there remains clear differences between the positions of the Constabulary and the Applicant as detailed in this WR. The ExA will therefore need to consider the acceptability of likely community safety and policing impacts and associated mitigation requirements, including additional police resourcing, as part of the Examination.

1.5.2 For the reasons set out in this WR, the ExA is respectfully asked to endorse the following positions held by the Constabulary and to ensure these are applied by the Applicant:

- Any assessment of likely policing impacts must be based on reliable data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project;

- It is therefore inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group ('SEAG') as the basis for assessing likely community safety and policing impacts from the SZC project in Suffolk;

- The development of community safety mitigation measures, including the quantum and structure of additional police resourcing, must be adequate, effective and appropriate for the policing context of the SZC project in Suffolk;

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

- It is therefore inappropriate to replicate the on-site 'Beat Team' approach to policing mitigation adopted at HPC for the SZC project in Suffolk; and,

- Instead, the quantum and structure of additional police resourcing identified by the Constabulary through this PIA as being necessary to help mitigate likely community safety impacts over the build period of the SZC project should be funded by the Applicant. Robust monitoring and adequate contingency funding also needs to be secured through the SZC Public Services Resilience Fund (Section 106 Agreement) to address additional potential community safety risks.

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

## 1.6 Written Representation Structure

1.6.1 The remainder of this WR is structured as follows:

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

- **Section 3 – Pertinent Differences between Suffolk and Avon & Somerset** highlights key operational differences between the force areas and policing models to illustrate that it is not appropriate to replicate the policing mitigation approach between the HPC and SZC projects as the Applicant has proposed.

- **Section 4 – Community Safety Impacts from the Sizewell C Project** identifies the community safety impacts that the Constabulary consider are likely to occur from SZC which will require policing involvement or management to avoid residual significant adverse effects or other unacceptable community safety risks.

- **Section 5 – Concern's Regarding the Applicant's Approach** outlines the Constabulary's main concerns with the approach adopted by the Applicant to date in the consideration of likely community safety and policing impacts from SZC. Further comments regarding the assessment, mitigation and acceptability of likely community safety impacts as predicted by the Applicant are provided in Part 3 of the WR.

- **Section 6 - Suffolk Constabulary Police Resourcing Assessment Methodology** details the approach adopted by the Constabulary to undertake an independent assessment of likely community safety and associated policing resourcing impacts from the SZC project.

- **Section 7 - Population Based Community Safety and Policing Impacts** outlines the Constabulary's current demand and resourcing structure in respect of three main impacted policing functions before setting out forecasted additional resourcing demands likely to be generated by the SZC construction workforce.

- **Section 8 - Construction Traffic Based Community Safety and Policing Impacts** outlines forecasted additional roads policing demands likely to be generated by the construction phase of the SZC project.

- **Section 9 – Mitigation and Monitoring** confirms the quantum, structure and phasing of additional resourcing identified through this PIA as being required to help mitigate likely community safety impacts from the SZC project.

# 2 Suffolk Constabulary Overview

## 2.1 Introduction

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

## 2.2 National Context

2.2.1 Policing across England and Wales is provided by 43 territorial autonomous police forces. For most forces, their geographical responsibility is synonymous with the county borders. For a small number there are two or more counties covered. The College of Policing and the National Police Chiefs Council ('NPCC') ensure standardisation of policing delivery across the UK but the way in which individual police forces are structured and resourced differs significantly dependant on demand, community needs and geography.

2.2.2 The Policing Protocol Order 2011 establishes the position of elected Police and Crime Commissioners ('PCC') and their respective Chief Constables in law. Chief Constables are charged with the impartial direction and control of all constables and staff within the police force that they lead. The Chief Constable holds office under the Crown but is appointed by the PCC for their force area. At all times the Chief Constable, their constables and staff remain operationally independent in the service of the communities that they serve.

## 2.3 Policing in Suffolk – Operational Model

### Overview

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

2.3.2 The Constabulary has an establishment of 1,219 FTE police officers and 40 Police Community Support Officers ('PCSO')[2] and over 872 police staff. In 2019[3], the force dealt with:

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

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

### Policing Structure

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

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

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

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

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

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

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

### Area Commands

2.3.7 The Constabulary operates as a single Basic Command Unit ('BCU'). The BCU is led by a Chief Superintendent. The county BCU is then divided into three 'Area Commands' each led by a Superintendent[4]. Within the three Command Areas, Neighbourhood Response Teams (NRTs) operate from nine bases across the County. The NRTs operate a five-shift pattern to provide an early, late, and night shift seven days a week. There are nine response teams operating across the county at any one time to ensure sufficient resources at the right locations to respond to any calls for service.

2.3.8 Each Command Area is also split into several SNT areas; there are 18 SNT areas across the County. Each NRT and SNT is made up of Police Constables and Police Sergeants. Police Inspectors have responsibility for a number of NRTs or SNTs. The SZC main development site lies within the Eastern Command Area, the Halesworth Local Policing Command ('LPC') and the Leiston SNT.

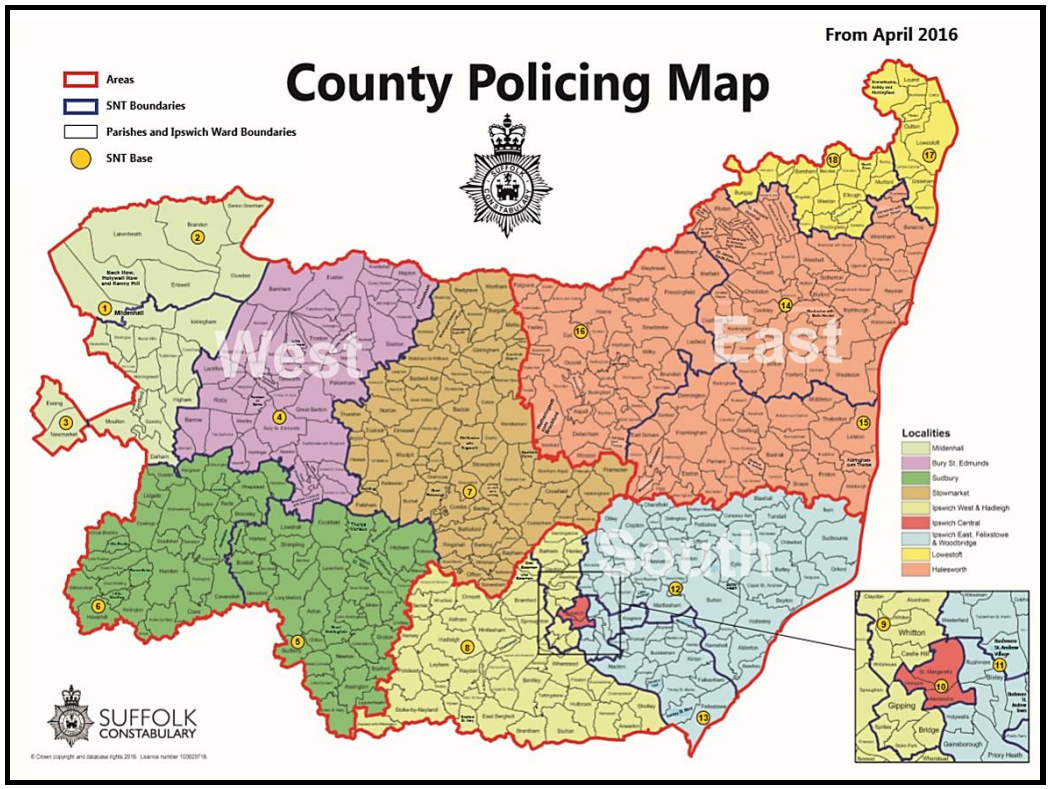



Figure 2.1: Suffolk Constabulary Operational Areas

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

### Crime, Safeguarding and Investigation Management

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

### Other Policing Functions

2.3.10 Other policing functions include:

- **Roads and Armed Policing:** teams operate from five operating bases across both Norfolk and Suffolk. Armed and roads policing for Leiston is based at Police Headquarters at Martlesham. Strategic Threat and Risk Assessments ('STRAs') are undertaken for both Armed and Roads policing functions and these dictate the level of cover provided over each part of the day.

- **Intelligence and specialist crime functions:** these functions are both area and centrally based. For Leiston this would either be Lowestoft Police Station or Police Headquarters in Martlesham.

- **Custody facilities:** located at three Police Investigation Centres (PICs) at Martlesham, Bury St Edmunds, and Gorleston in Norfolk. Persons arrested in the Leiston area may be taken to any of three PICs depending on capacity but in most cases this will be either Martlesham or Gorleston.

- **Forensic Services:** provided from either Lowestoft Police Station or from Landmark House on the A14 south of Ipswich.

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

### Policing in Halesworth and Leiston

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

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

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

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

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

## 2.4 Local Policing Deployment

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

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

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

## 2.5 Roads Policing

### Overview

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

### AIL Escort Role and Capability

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

Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled can impact the remaining operational number of RAPT officers available to be rostered for normal duties[5].

2.5.3 The movement of AILs including obtaining permission for the required route is a complex and time intensive operation. Hauliers are required to provide advance notice of the movements of an AIL in accordance with the Department for Transport regulations. For many loads this is set at a minimum of two clear days to the Constabulary and the affected Local Highway Authorities and bridge authorities. For Special Order movements[6], including mobile cranes over 80 tonnes GVW, two clear days' notice are required to the affected police and five clear days' notice to highway and bridge authorities. Longer notice could be necessary where temporary traffic management measures are required which are generally managed under Temporary Traffic Regulation Orders ('TTROs'). The management of AILs is always at the discretion of the Chief Constable for the affected local Constabulary.

[5] Police Regulations state that changes to shift patterns require 30 days' notice and that police officers should have at least 11 hours rest between shifts.
[6] Driver & Vehicle Standards Agency - Special types enforcement guide – Updated 27 September 2018

# 3 Pertinent Differences between Suffolk and Avon and Somerset

## 3.1 Overview

3.1.1 The Constabulary is concerned regarding the over reliance by the Applicant upon the perceived experience of the construction of the HPC project within the Avon and Somerset Police area to seek to predict community safety and policing impacts from the SZC project in Suffolk. Whilst the Constabulary acknowledge the importance of 'learning lessons' from HPC and have indeed spent considerable time engaging with the Avon and Somerset Police to understand potential impacts, this approach is not appropriate as baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different.

3.1.2 The section highlights key operational differences between the Constabulary and Avon and Somerset Police to illustrate that, irrespective of the predicted level of community safety impacts, it is not appropriate to replicate the same policing mitigation approach between the HPC and SZC projects as the Applicant has proposed. Details regarding the Constabulary's proposed approach to the delivery of adequate and appropriate mitigation are discussed in Section 9.

3.1.3 Evidence presented in this section demonstrates that the baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different, with Leiston and Hinkley also having significantly different baseline policing capacities. This reflects differences in the two forces operational policing models which have evolved to address differential needs of the local communities within their respective counties. In consequence it is not appropriate to replicate incident modelling or police resourcing mitigation solutions between the projects as the Applicant has proposed; a bespoke solution is instead required to address the net additional policing impacts of the SZC project within Suffolk.

## 3.2 Demographic and Socio-economic Differences

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

### Population Density

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

3.2.3 Suffolk is more rural than Avon and Somerset with a population of around 760,000 over 1,585sq miles. There are six main population centres in Suffolk: the county town Ipswich (pop. 137,000), Lowestoft (pop. 75,000) and Bury St Edmunds (pop. 41,000), Felixstowe (pop. 25,000), Stowmarket (pop. 20,000) and Newmarket (pop. 16,600).

3.2.4 The proposed location of SZC is in a low population density area of Suffolk. Leiston is the nearest town to SZC. In 2019 it was estimated that the population was 5,751. The nearest larger towns with access to amenities are Ipswich (25 miles) and Lowestoft (24 miles).

3.2.5 While HPC is located on the coast in a rural part of Somerset the nearest population centre with good access to amenities is Bridgewater (pop. 41,000+) which is 11 miles from the site.

### Age Groups

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

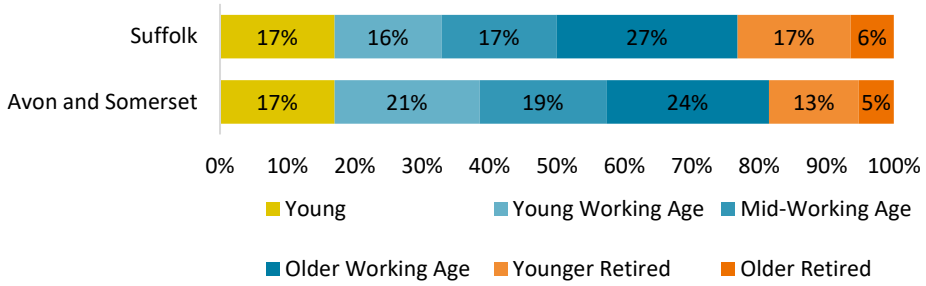



Figure 3.1: Age Structure Comparison with Avon and Somerset, 2018

3.2.7 Deprivation The nearest town to SZC is Leiston which sits within the East Suffolk District Authority. In 2019 Leiston and the surround area was ranked 15,788 out of 32,844 LSOAs in England: where 1 is the most deprive LSOA. This is amongst the 50% most deprived neighbourhoods in the country.

3.2.8 Using the Index Multiple Deprivation ('IMD') rank of average summary measure East Suffolk Authority District ranked 158 out of 317 local authorities and has some of the most deprived areas in Suffolk. Bridgewater is the nearest town to HPC. It is situated within the Sedgemoor Local Authority District. Using the IMD rank of average summary measure Sedgemoor Local Authority District ranked 121 out of 317 local authorities.

3.2.9 Compared to the 2015 IMD data deprivation has increased in both the East Suffolk and Sedgemoor District Authorities. However, the severity of IMD has increased more in Sedgemoor than in East Suffolk.

3.2.10 East Suffolk has some of the least deprived Lower-level Super Output Areas ('LSOA') in the country using the Crime MDI filter. The area around Leiston shows a generally low crime deprivation rate although Saxmundham is an

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

#### Summary

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

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

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

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

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

### 3.3 Operational Policing Differences

#### Resourcing Capacity

3.3.1 At force level, differences between Avon and Somerset Police and the Constabulary are evident in the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (‘HMICFRS’) categorisation of Most Similar Groups (‘MSGs’), which places Avon and Somerset and Suffolk in significantly different groups. Importantly this relates to factors including geographical situation, resourcing, capacity, and workload, meaning the ability of Avon and Somerset Police and the Constabulary to help address community safety impacts from HPC and SZC, the need for associated mitigation and the most appropriate mechanism to deliver this mechanism are not directly comparable.

3.3.2 The HPC main development site is located within the Sedgemoor District policing area of Avon and Somerset Police. A comparison of existing local policing resources within the Constabulary’s Halesworth LPC and Avon and Somerset Police’s Sedgemoor District area is provided in Table 3.2 below.

Table 3.2: Local policing resource comparison

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

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

### Local Geography

3.3.4 HPC is located relatively close to Bridgwater, which serves as the home base for many county policing services. In contrast, the SZC main development site is remote from similar services in Suffolk.

3.3.5 The nearest Police Centre to the HPC main development site is located in Bridgwater, which is the largest police station in the Avon and Somerset Police area and acts as the home base for all Community Policing Units serving the Hinkley area. Bridgewater Police Centre houses several disciplines including uniformed, non-uniform and various specialist teams. This means all relevant policing units are available locally to manage issues arising from HPC (including the NHB workforce predominantly located in Bridgewater) and that additional Response Policing demands can be met from existing resources.

3.3.6 Local policing for the Halesworth LPC operates out of Halesworth Police Station, whilst specialist teams and non-uniformed officers operate out of Lowestoft (26.1 miles from Sizewell) or Police Headquarters at Martlesham (22.6 miles from Sizewell). Reflecting the rural and demographic characteristics

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

Table 3.3: Local policing accessibility comparison

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

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

### Transport Accessibility

3.3.8 Differences in the proximity of the HPC and SZC sites to the strategic road network means additional demand on roads can be more easily met through Avon and Somerset Polices Roads Policing Units. Access to the SZC main construction compound, having left the dual carriageway of the A12, is through single carriageway, country roads which are not regularly patrolled by such units

3.3.9 Avon and Somerset Police's Roads Policing Units are strategically based at Bridgwater to provide a roads policing capability along the M5 route connecting Taunton, Bridgwater, and Weston Super-Mare. In contrast, the East Suffolk Command Area does not have any strategic roads, the closest being the A14 at Nacton, some 25.2 miles from the SZC site.

3.3.10 Whilst the A12 is the main route that allows policing units to travel between Halesworth, Lowestoft and Martlesham, significant lengths are single carriageway and it is not a strategic (Trunk) route (as defined by Highways England) so the Constabulary's Roads Policing Firearms Operations Unit (RPFOU) do not routinely patrol the route. Any disruption to the A12 impacts heavily not only on local policing units but also those specialist teams required to travel to incidents from further afield. If the A12 is closed and traffic is diverted, Suffolk's rural road network is a very difficult route to navigate and significantly increases travel times. The Constabulary's policing model and its resourcing factors in travel times to emergency response calls. Changes to road metros that themselves change response times further supports the need for a more localised mitigation of additional demand.

### Urban and Rural Amenities

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

# 4 Community Safety Impacts from the Sizewell C Project

## 4.1 Overview of SZC Project

4.1.1 The main development site for SZC is located on the Suffolk coast, immediately to the north-east of Leiston and approximately halfway between Felixstowe and Lowestoft, within the administrative boundary of East Suffolk Council ('ESC').

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

## 4.2 Likely Community Safety Impacts

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

### Substantial Demographic Changes

4.2.2 From information provided in the SZC DCO application it is clear the construction of SZC will require a very large workforce, including a significant NHB component, over a prolonged period (12 year estimated construction programme). The Applicant contends that much of this workforce will be drawn from the workforce engaged in the construction of SZC in Somerset whilst simultaneously highlighting local economic and employment benefits for people in Suffolk.

4.2.3 To understand the community safety risks and impacts from the SZC construction workforce, it is first necessary to understand the baseline demographic position. In short, the existing population of Suffolk displays a predominantly rural character with a high rate of population ageing, resulting in a specific demographic profile (as opposed to simply a population size) that is associated with relatively low crime and wider community safety risks. Any substantial change to this demographic profile is therefore likely to increase the risk profile and generate adverse impacts. It also should be noted that Suffolk's demographic profile differs from other areas including that of Somerset,

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

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

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

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

- *Traffic volumes and effects on road capacity and specific events such as delivery of road-borne AILs which may have the potential to affect emergency service response times to the immediate locality and surrounding communities.*

- *Impacts on equality target groups and community cohesion, including on vulnerable groups.*

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

- *Potential risks to vulnerable young people and care leavers, particularly in Leiston, and particularly those who are in housing need or vulnerable to homelessness;*

- *Potential risks related to cultural differences between NHB construction workers and residents.*

- *Potential risks related to drugs, alcohol and prostitution including exploitation of young girls by a predominantly male workforce, and potential for related increase in trafficking and other hidden harm.*

- *Potential risk of increase in mental health issues from SZC workforce, and correlate in increased demand on Policing.*

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

### Substantial Traffic Changes

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

### HGV Traffic

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

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

### AIL Movements and Traffic Delays

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

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

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

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

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

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

4.2.14 SZC is likely to attract heighted protestor activity to Suffolk, due to the contentious nature of nuclear energy, as exhibited through other major infrastructure development projects. Where such protests fall within areas that are policed by the Constabulary, to ensure the most expedient response and so resolution to these protests, there is a need to ensure that those officers that addresses protestor removal are equipped and trained to deal safely with the eventualities that such protests can attract and the methods and means of addressing the tactics such protesting is known to use.

4.2.15 The current number of officers trained for protestor removal in Suffolk is based around catering for likely current demand within Suffolk, and they are trained to F5 Module 'Basic Protestor Removal' level as set by the College of Policing. The number of officers trained will need to be increased to address the likely increase in protest removal requirements from SZC activity. In addition to the current F5 Module training requirement there will be a need to train Suffolk officers to the College of Policing F7 Module that allows for the removal of protests held at height and the purchase of specialist equipment required for protester removal at height.

4.2.16 If the Constabulary's s ability to efficiently facilitate and manage protests connected with SZC is not adequately resourced there would be a need to call upon neighbouring forces, which is likely to result in significant delays in the lawful resolution of protests and increased disruption.

### Additional Community Safety Risks

4.2.17 Following discussions between the Constabulary and the Applicant, the SZC PIA has focused on quantifying demand arising from likely community safety impacts attributable to the projected SZC NHB workforce population (including families) on a per capita basis and owing to the need for significant AIL movements. However, additional resource implications also need to be considered in the context of wider community safety and policing impacts not directly attributable to individual construction workers or AIL movements. This is required as:

- The predicted increase in crime and wider community safety incidents requiring police involvement is not solely predicated on SZC workers being direct perpetrators or victims of crime. Rather, it is well established that areas of concentrated population including major constructions sites often become a 'honey pot' that attracts criminals to the area as a result of increased market demand and 'rich pickings'. A concentration of workers on a higher than average wage for the area, and the associated trappings these workers will bring i.e. disposable income for the night time economy and other recreational activities (both legal and illegal) will attract market suppliers.

- Predicted demand for local policing based on current known per-capita based levels of demand cannot quantitatively forecast other areas of crime and wider policing demand growth which are likely to arise from a

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

- Serious crime areas such prostitution, human trafficking and modern-day slavery, as well as an increase in night time economy offences, violence against the person, domestic violence and sexual offences. These offences are among the most intensive in terms of police resourcing and harm caused to victims.

- County Lines – criminal groups who deal drugs look to exploit new drugs markets to expand their business, for which the SZC NHB workforce would be a prime market. Areas of Leiston are deemed as deprived and already home to a proportionately higher number of drug users, so a disproportionate proportion of the S23 warrants executed within the Halesworth locality are in Leiston. To ensure drugs lines are not established, pro-active policing will need to take place to deter any wider criminal activity. The introduction of a very large transient workforce will be very attractive for organised criminals to target. If drug lines are established, other related crimes will occur including violence (including possibly weapons), public order, burglary, robbery, theft, child sexual exploitation and MDS.

- Responding to EDF Site Security – local policing units will be required when security become aware of suspicious activity around the site, such as individuals taking pictures or filming. In such situations the Constabulary resources will be required to engage and investigate the activity. Local units will also be asked to attend the site when security checks identify items that are illegal or prohibited, or incidents identified by security where warranted powers are required.

- Licensing – bars, restaurants and clubs will need a proportionate policing response. Officers will need to undertake license checks to ensure compliance with conditions and any incident within a licensed premise will need to be reviewed by the Constabulary.

- Visible patrols – any increase in crime, or perceived increase in risk, results in heightened community concerns and tensions. The most effective way to reassure the community is to provide visible policing patrols into those areas where concern has escalated, which requires resources to be diverted from other commitments. Whilst data presented above helps to represent the time and resources needed to deal with particular types of crime, it cannot accurately reflect the additional time and resources needed to undertake additional patrols and to be visible, supportive and engaging with the public in the aftermath of incidents.

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

- Protests – spontaneous and prolonged protests will be assessed at the time and resources allocated to it. This may be local officers or specialist officers, either way they would be abstracted from the shift strength at that given time. In the absence of additional resourcing, this would create weakness in the overall workforce strength to manage the protest and maintain the current standard of police service.

- Crime prevention work – local SNT resources promote crime prevention, this will be both on and off site. The effective delivery of crime prevention messages can significantly influence the level of activity that requires further police resources by stopping incidents and crimes occurring.

- Suspicious incidents – where local residents become concerned about "activity" that is suspicious, the police will be called. This could mean potential drugs dealing, cars parked outside houses, groups gathering, the behaviour of individuals and other behaviour that concerns people. What is reported will drive the level of police response required.

- Safeguarding Investigation Unit (SIU) – where concerns are raised regarding the safety or wellbeing of a minor (aged under 18) the Safeguarding Investigations Unit will conduct a visit, sometimes jointly with Social Services. SIU investigations vary in length and can be very resource intensive, often taking months of police involvement and work. With the arrival of family members and children, it is expected that this will create additional demand on SIU resources.

- Hate crime prevention work – as the SZC construction workforce is like to be diverse, the Leiston SNT will need to engage with the Applicant and orders around hate crime. It is expected that a large number of these engagements will be on site.

- Parking and congestion – Notwithstanding proposed parking related mitigation measures, there is a real concern around the potential for fly parking in Leiston and the immediate surrounding area. The Applicant has continued to experience such problems at HPC, which has had an impact on their workforce and caused tensions within the local community. Many of the residential roads within Leiston (and other areas) are already at a saturation point and any increase in parked vehicles will cause obstructions. The main entrance to the SZC main development site is due to be located on the B1122 which is a single lane, two-way road. It is one of the main routes into Leiston which, if congested due to illegal parking would impact on local and SZC traffic.

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

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

**Summary**

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

# 5 Concerns Regarding the Applicant's Approach

## 5.1 Overview

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

## 5.2 Narrow Scope of Published Community Safety & Policing Impact Assessment

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

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

- **Narrow scope of assessment -** the singular focus of the small policing impact assessment (Paragraphs 9.7.216 – 9.7.23 of Chapter 9 (Socio-economics) of the ES (APP-195) on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than considering wider community safety impacts which are likely to require police involvement and thus place resourcing demands upon the Constabulary.

- **Limited consideration of demographic factors** – the quantitative assessment of population dynamics undertaken in Chapter 9 (Socio-economics) of the ES (APP-195) does not appear to have been factored into the assessment of resulting community safety impacts (i.e. resulting from higher risk demographic profile and concentration of the NHB construction workforce in a rural community).

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

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

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

## 5.3 Why Reliance on HPC SEAG Data Is Inappropriate

5.3.1 In recent correspondence and meetings held between the Applicant and the Constabulary to inform the preparation of this PIA (to address the assessment gap identified above), the Applicant has suggested that any modelling of policing impacts from SZC should be based on policing data collated by the HPC Socio-economic Advisory Group ('SEAG') in order to account for their workforce characteristics. This position is not accepted by the Constabulary owing to known weaknesses with the HPC SEAG data (including under-reporting). Also, the introduction of a workforce population in one demographic, socio-economic and geographical situation cannot be predicted to generate the same community safety impacts in an entirely different situation, even if the same NHB workers were involved. The Constabulary is therefore concerned regarding an over reliance by the Applicant upon the perceived experience of the construction of HPC project within the Avon and Somerset Police) area to seek to predict community safety and policing impacts from the SZC project in Suffolk.

5.3.2 It should be noted that SEAG reports have evolved since 2017 and thus do not present comparable data over the HPC construction period, including regarding what data is included and how data is broken down. This has been confirmed by the HPC 'Beat Team' as a known issue which affects the ability to use the SEAG data to present a full picture of policing impacts arising from HPC. Policing data collated by the HPC SEAG is also known to suffer from other quality issues, including inconsistencies and inaccuracies in the recording of incidents. Further information on the poor data quality of SEAG data is presented in Appendix C.

5.3.3 The Applicant has identified three sources of policing (crime and non-crime) data reported by Avon and Somerset Police to the HPC Socio-economic SEAG. Issues associated with each of these which undermine the reliability of the SEAG data and mean that it is not appropriate to use as a modelling input for SZC are outlined in turn below.

### Automatic Tagging

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

5.3.5 HPC SEAG returns are based on CADs[7]/investigations being flagged or tagged as relating to HPC (including indirectly via the NHB workforce and associated families). It is well reported within policing and academic quarters that this process is known to be inconsistent as crimes and incidents can be missed from being tagged or wrongly categorised. Numerous studies have shown there are weaknesses associated with police use of tagging/flagging with regards to mental health, digital/online crime and hate crime – all of which involve mandatory tagging by the Home Office. One known issue with tagging/flagging is officers forgetting to include a specific tag/flag during the height of an investigation.

5.3.6 Another concern is that unlike a specific event or crime case (often geographically specific and time limited) where related incidents or reports can relatively be easily identified, incidents involving or affecting members of the SZC NHB workforce or their families may be otherwise completely unrelated to SZC and dispersed amongst reports of other incidents across the force area.

5.3.7 To work effectively, tagging/flagging requires caller/victim/person reporting to use a key word relating to HPC/EDF for it to be tagged as related to it. If the incident is not addressed by the HPC Beat Team (e.g., due to limited operating hours and staffing) and does not relate to a place of employment or a group of employees, it is unlikely an individual reporting would think to volunteer that information without prompting. Additionally, the terms of proposed SZC Code of Conduct mean the Applicant's workers may be less likely to volunteer to the Constabulary their connection with HPC if they have committed an offence or fear their behaviour being reported back to their employers.

### Security Response Occurrence Forms

5.3.8 Security Response Occurrence Forms ('SORFs') are generated by HPC's on-site security team, led by a former police officer, rather than coming directly from the Constabulary. The response from the Applicant dated 29th April 2021 states that SORFs are shared with the Avon and Somerset Police/HPC policing team to add to the SEAG statistics where these relate to a crime.

5.3.9 Whilst the use of SORFs would be supported as promoting regular dialogue between the on-site security team and the Constabulary, they are an inappropriate mechanism for statistical reporting and interpretations between HPC and SZC due to clear potential for inconsistencies.

5.3.10 SORFs are produced by HPC's on-site security team and only those deemed relevant are passed to Avon and Somerset Police, including where further investigation may be required. However, it cannot be guaranteed that a civilian on-site security team will adopt the same position as a Constabulary (whether Avon and Somerset Police or Suffolk) regarding the relevance of every incident or any potential need for subsequent police resourcing.

5.3.11 The significant local experience of HPC's on-site security team combined with the working relationship between the Applicant and Avon and Somerset Police

[7] Computer Aided Dispatch

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

#### Incidents dealt with by HPC Beat Team

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

#### Summary

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

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

### 5.4 Limitations of HPC Beat Team Model

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

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

- Work dealt with by the HPC Beat Team is often activity that is handed to the Beat Team from other departments including CCR, Roads Policing, NRT and CID. Therefore, by default, work has already had to have been completed by officers outside of the EDF funded Beat Team. The level of work that has been completed by other resources before it is passed onto the funded Beat Team will vary depending on the specific incident; Appendix D provides examples of where additional resourcing to the Beat Team may be required for each SEAG crime classification. This suggests Avon and Somerset may have had to absorb significant net additional policing demand generated by HPC through existing resources.

- Without prejudice to operational decisions made by Avon and Somerset Police or to any mitigation agreements reached between EDF and Avon and Somerset Police in respect of HPC, it is clear Suffolk and Avon and Somerset Police have different operational models and resourcing capacities, such that the Constabulary is less able to absorb any net additional increase in policing demands without additional resources.

- Under the Police and Criminal Evidence Act ('PACE'), that there is a responsibility for the police to progress issues when a person is placed in custody in the most expeditious way (as an individual is having their liberty infringed upon). This means that the arresting officer, whichever team they are drawn from, will be fully engaged within the process to progress enquiries in the most expedient manner without delay. The period that the initial arresting officer is engaged in the process, will depend on the type and severity of the incident and so the number of enquiries that will need to be followed. The implications of PACE requirements are A) if the arresting officer is from the Beat Team they will be abstracted from their shift and any scheduled events i.e. site visits or talks to HPC staff, so the need for resilience within the Beat Team is paramount B) If the arresting officer is outside the Beat Team, the arresting officer cannot pass the workload onto the Beat Team until the arresting officer has progressed to the appropriate stage that allows for an appropriate handover. This again means that work is likely to have been absorbed by officers outside of the funded HPC Beat Team, even if the case is then handed over to the Beat Team.

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

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

5.4.4 Additionally, when responding to a call of a significant nature there is the issue of needing to apply the “Golden Hour Rule”. The golden hour is the term used for the period immediately after an offence has been committed, when material is readily available in high volumes to the police.

5.4.5 Positive action in the period immediately after the report of a crime minimises the amount of material that could be lost to the investigation and maximises the chance of securing the material that will be admissible in court. To properly undertake this action, there will be a need to pool resources from those units on duty at the time, again exhibiting that a limited Beat Team cannot have the capacity to address the resource requirements.

## 5.5 Importance of Employment Status for Crime Modelling

5.5.1 The Applicant has suggested that the Constabulary’s police resourcing impact model should control for employment status. Unlike age and gender, employment status is not recorded by the Constabulary or any other police force in the country. Neither victims nor suspects are obliged to share this information with the police. Additionally, evidence from academic literature indicates that the relationship between employment status and crime is unclear.

5.5.2 There are four main problems commonly faced in trying to establish any relationship between unemployment and crime (or the absence of a relationship from an employed workforce):

- Crime is committed by both unemployed and employed people and that periods of historic employment levels have seen an increase in certain types of crime.

- There is limited data available to link economic status to criminal investigations as the police routinely record this.

- Studies usually focus on property crimes, rather than crime as a whole or other crime types. Successive studies (usually in America) have showed that there is a correlation between property crime and unemployment. However, correlation is not causation and most of the studies do not include multivariate modelling or control in their regression analysis.

- Most significantly, there is an endogeneity issue with trying to establish a causal relationship between unemployment and crime as unemployment could be either the cause or the effect of crime: ie someone commits crime because they are unemployed or are unemployed because they commit(ed) crime and lost their job as a result. Endogeneity makes establishing causal factors difficult and almost always open to dispute and interpretation.

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

## 5.6 Limited Impact of Embedded Mitigation

### Worker Code of Conduct

5.6.1 It is acknowledged that the Applicant has placed great a deal of weight on the Worker Code of Conduct as a tool to mitigate the community safety impacts of the SZC workforce. Whilst the exact details of the Worker Code of Conduct has yet to be formally agreed, it is the power of the Worker Code of Conduct as a tool to influence worker behaviour that needs to be established.

5.6.2 The Worker Code of Conduct does not provide a legal gateway for the Constabulary to disclose information for non-policing purposes. The Constabulary has to rely on another policing power. When the Constabulary are responding to or investigating an incident any victim, witness or suspect does not have to provide any detail regarding their profession or their employer details. This then causes two issues:

- If an individual commits a criminal act and is dealt with by the Constabulary, the Constabulary would not be aware of the individual's link to SZC and the position they hold.

- If the individual did volunteer the information to confirm they are employed on the construction site (or associated sites) the rules around any disclosure to their employer or regulatory body is very much limited. Common Law Police Disclosure '(CLPD') has replaced the Notifiable Occupations Scheme ('NOS'). CLPD provides a way to pass on relevant and necessary information where there is a public protection risk so that the employer can act swiftly to mitigate any danger by putting in place safeguarding measures. Disclosure will be made when there is an urgent social pressing need and must be balanced with the individual's human rights and welfare needs. This can occur at the point of arrest, charge, voluntary attendance or receipt of information indicating an SCZ worker may present a risk to the public. Disclosure cannot occur unless there is an urgent and serious risk. This will mean the large proportion of situations will fall outside of these parameters.

5.6.3 In both of the above cases, the Constabulary will not be in a position to provide the Applicant (or the individuals employer) with the fact that they have been involved in any criminal activity.

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

5.6.4 The Applicant will be unable to apply to the Constabulary for any data related to their workers under the “Subject Access” route as the information is personal to the individual involved. It would be unlawful for the Applicant to request a worker submits a subject access request themselves. That is referred to as Enforced Subject Access and is a criminal offence under the Data Protection Act 2018.

5.6.5 Whilst the Worker Code of Conduct is welcomed, it does not provide a robust means to prevent any criminal act, disorderly behaviour or anti-social behaviour. It will not provide a platform for information to be shared to the Applicant. For these reasons, it is not appropriate to seek to quantify the impact of the Worker Code of Conduct in deterring crime incidents. There is insufficient monitoring and evaluation evidence to robustly suggest a percentage reduction in incidents, or any other quantifiable metric by which it could be reliably incorporated.

### Security Vetting

5.6.6 The Constabulary understands that all staff working on the SZC project will undergo security vetting. However, the Applicant has not confirmed what level of vetting and what criteria will be applied. The acceptance thresholds for roles have also not been disclosed i.e. what type of previous criminal record would mean a would-be employee would not be recruited for the SZC project.

5.6.7 Whilst the vetting is welcomed, the Constabulary cannot view the Applicant’s vetting as a tool that will reduce policing impact. Through dialogue with colleagues in Avon and Somerset it is known that despite having undergone vetting, some EDF workers who have come into contact with the police are found to have criminal records that from a policing stance, would have made them likely candidates to recommit certain crimes or activities.

# 6 Suffolk Constabulary Police Resourcing Assessment Methodology

## 6.1 Overview

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

- Annual average NHB workforce figures provided by the Applicant to model likely policing demands and associated resourcing requirements arising from the NHB workforce population during the construction of the SZC project. This approach is underpinned by use of the NPCC standard officer cost rate.

- A proportionate risk-based approach to predict the volume of AIL movements likely to require police escort during the construction period, taking account of other proposed traffic mitigation measures.

## 6.2 Population Based Policing Demand – Input Data

### Modelling based on Observed Characteristics in Suffolk and Predicted SZC Workforce

6.2.1 Community safety and policing impacts are predicted to occur during the construction phase of the SZC project due to factors including substantial demographic changes resulting from the predicted NHB construction workforce[9]. The demographic profile of this workforce is likely to be significantly different from the demographic profile of Leiston and Suffolk as a whole.

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

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

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

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

### Construction Workforce Demographics

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

Table 6.1: Assumed age and gender breakdown of construction workforce

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

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

### Age and Gender Weightings

6.2.6 The Constabulary has analysed observed arrest, suspect, non-crime incident, and victim data to determine the proportional involvement of different age and gender groups in driving police demand. The rates of these incidents vary depending upon the demographics of the population. Table 6.2 and Table 6.3 below show the number and proportion of incidents involving various age and gender groups[11]. Table 6.4 then applies the following formula to derive age and gender weighting factors:

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

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

[10] 2011 Census data for the Construction Industry, supplied by QUOD (12/08/2020)
[11] The recording periods for total incidents vary depending on data availability.

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

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

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

| | Population (mid-2018) | | | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 65,966 | 63,094 | **129,060** | 741 | 312 | **1,053** | 2,720 | 1,053 | **3,773** | 31,841 | 29,489 | **61,330** | 1,726 | 1,711 | **3,437** |
| **Young Working Age** | 61,410 | 57,121 | **118,531** | 16,117 | 2,825 | **18,942** | 10,896 | 3,544 | **14,440** | 31,275 | 34,541 | **65,816** | 5,189 | 5,862 | **11,051** |
| **Mid-Working Age** | 64,974 | 65,032 | **130,006** | 11,638 | 2,492 | **14,130** | 8,552 | 3,000 | **11,552** | 26,731 | 28,492 | **55,223** | 4,818 | 5,199 | **10,017** |
| **Older Working Age** | 100,445 | 103,915 | **204,360** | 5,394 | 1,138 | **6,532** | 4,355 | 1,567 | **5,922** | 18,089 | 17,263 | **35,352** | 5,155 | 4,126 | **9,281** |
| **Younger Retired** | 62,176 | 67,078 | **129,254** | 523 | 71 | **594** | 666 | 234 | **900** | 4,473 | 4,317 | **8,790** | 1,517 | 1,166 | **2,683** |
| **Older Retired** | 21,027 | 29,112 | **50,139** | 50 | 1 | **51** | 158 | 84 | **242** | 2,172 | 2,985 | **5,157** | 316 | 525 | **841** |
| **All ages** | **375,998** | **385,352** | **761,350** | **34,463** | **6,839** | **41,302** | **27,347** | **9,482** | **36,829** | **114,581** | **117,087** | **231,668** | **18,721** | **18,589** | **37,310** |

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

| | Population (mid-2018) | | | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 9% | 8% | **17%** | 2% | 1% | **3%** | 7% | 3% | **10%** | 14% | 13% | **26%** | 5% | 5% | **9%** |
| **Young Working Age** | 8% | 8% | **16%** | 39% | 7% | **46%** | 30% | 10% | **39%** | 13% | 15% | **28%** | 14% | 16% | **30%** |
| **Mid-Working Age** | 9% | 9% | **17%** | 28% | 6% | **34%** | 23% | 8% | **31%** | 12% | 12% | **24%** | 13% | 14% | **27%** |
| **Older Working Age** | 13% | 14% | **27%** | 13% | 3% | **16%** | 12% | 4% | **16%** | 8% | 7% | **15%** | 14% | 11% | **25%** |
| **Younger Retired** | 8% | 9% | **17%** | 1% | 0% | **1%** | 2% | 1% | **2%** | 2% | 2% | **4%** | 4% | 3% | **7%** |
| **Older Retired** | 3% | 4% | **7%** | 0% | 0% | **0%** | 0% | 0% | **1%** | 1% | 1% | **2%** | 1% | 1% | **2%** |
| **All ages** | **49%** | **51%** | **100%** | **83%** | **17%** | **100%** | **74%** | **26%** | **100%** | **49%** | **51%** | **100%** | **50%** | **50%** | **100%** |

Table 6.4: Incident weighting factors by age group and gender

| | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 0.21 | 0.09 | **0.15** | 0.85 | 0.35 | **0.60** | 1.59 | 1.54 | **1.56** | 0.53 | 0.55 | **0.54** |
| **Young Working Age** | 4.84 | 0.91 | **2.95** | 3.67 | 1.28 | **2.52** | 1.67 | 1.99 | **1.82** | 1.72 | 2.09 | **1.90** |
| **Mid-Working Age** | 3.30 | 0.71 | **2.00** | 2.72 | 0.95 | **1.84** | 1.35 | 1.44 | **1.40** | 1.51 | 1.63 | **1.57** |
| **Older Working Age** | 0.99 | 0.20 | **0.59** | 0.90 | 0.31 | **0.60** | 0.59 | 0.55 | **0.57** | 1.05 | 0.81 | **0.93** |
| **Younger Retired** | 0.16 | 0.02 | **0.08** | 0.22 | 0.07 | **0.14** | 0.24 | 0.21 | **0.22** | 0.50 | 0.35 | **0.42** |
| **Older Retired** | 0.04 | 0.00 | **0.02** | 0.16 | 0.06 | **0.10** | 0.34 | 0.34 | **0.34** | 0.31 | 0.37 | **0.34** |
| **All ages** | **1.69** | **0.33** | **1.00** | **1.50** | **0.51** | **1.00** | **1.00** | **1.00** | **1.00** | **1.02** | **0.98** | **1.00** |

## 6.3 Population Based Police Resourcing Implications – Model Parameters

### Number of Incidents

6.3.1 The number of additional incidents associated with the NHB workforce has been estimated by applying per-capita rates of investigations, arrests, and emergency and non-emergency calls observed across Suffolk.

6.3.2 This approach accounts for the expected demographic profile of the SZC construction workforce by applying the age and gender weightings outlined in Table 6.4 above. Using the unadjusted per-capita incident rates would only be appropriate if the demographics of the NHB construction workforce closely mirrored the existing demographic profile of Suffolk. As Table 6.5 below shows, this is not the case.

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

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

6.3.3 The Applicant predicts that the majority of the NHB workforce (88%) will be male, and over two-thirds (67%) will be between the ages of 20 and 49. The population of Suffolk, by contrast, is significantly older with the majority (54%) aged 50 or above.

6.3.4 To illustrate this process, Table 6.6 below presents the calculation of the anticipated number of criminal investigations associated with the NHB workforce in each year.

Table 6.6: Anticipated criminal investigations

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

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

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

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

Table 6.7: Anticipated number of incidents, Local Policing only

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

## Resourcing Requirements

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

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

Table 6.8: Incidents per Local Policing officer, 2019

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

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

Table 6.9: Resourcing requirements, Local Policing only

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

6.3.10 In accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.

6.3.11 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.

6.3.12 For the avoidance of doubt, the Constabulary will use the nationally recognised NPCC full cost recovery rate for police officers which will include associated vehicles, training, and police staff. As such, while Custody and CCR have been included in the modelling, only the net increase in Local Policing resource requirements will be sought for mitigation.

## 6.4 Construction Traffic Based Policing Demand and Resourcing Implications - Approach

### Road Safety Issues

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

### Police Escorts for AIL Movement

6.4.2 As raised previously in this WR, the prime concern of the Constabulary's relates to impacts on roads policing as a consequence of the construction phase for SZC is the management of a substantial volume of AIL movements.

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

### Context

6.4.4 In accordance with relevant NPCC guidance, the routine escorting of vehicles falling within the provisions of the STGO ('AILs') under normal network operations does not normally require to be carried out by the Constabulary and in most cases is carried out by hauliers themselves. Crucially however, this is dependent upon the route and specific characteristics of each proposed AIL movement, review of submitted Movement Notices[12] and the outcome of a specific risk assessment made by the Constabulary's Abnormal Loads Officer. Exceptions may and do occur where no alternative arrangement can adequately ensure public safety, such as where Highway regulations have to

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

be contravened during the movement of the AIL and associated vehicle, such that police escorting is required[13].

6.4.5 Under current arrangements, police assistance can also be requested by hauliers for managing specific pinch points on the route (e.g. travelling on the wrong side of keep left instructions). This is a pro gratis service that is offered if, and when, there is police operational capacity to assist. Although booked in advance, operational requirements take precedence, which can result in delays for the haulier while they wait for officers to be available.

6.4.6 Current restrictions on AIL movements normally govern roads, times and/or days that a load is permitted to move. In accordance with Policy No 19 published by Norfolk and Suffolk Constabularies on December 2016[14], this normally prevents an AIL from travelling during:

- Bank holidays and weekends;
- The hours of darkness, except the A12 Essex Border to A14 Copdock Interchange and A14 Felixtstowe to Cambridge Border with width, weight and length restrictions;
- During periods where a major event has been planned;
- At certain times of days such as “rush hours” and high commuter traffic between 07:30 – 09:00 and 16:30 -18:00; and
- Other times at the discretion of the Abnormal Loads Officer.

6.4.7 These restrictions, which are in place to protect the functioning of the road network and public amenity from unacceptable impacts, are likely to cause significant challenges to the efficient movement of high volumes of AILs across Suffolk’s road network over a sustained period.

### SZC AIL Movements Likely to Require Police Escort

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

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

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

**The Constabulary's AIL Escort Matrix**

**This Matrix provides a risk assessed guide for the movement of AILs during the SZC construction period. All AIL movements are subject to review by the Constabulary's Abnormal Loads Officer; where the full extent of the route ar specific load dimension will be assessed and the appropriate level of risk determined.**

**Key**

**High Risk (Red)** – Recommended that vehicles should have Police Escort
**Medium Risk (Amber)** – Police escort is recommended, although hauliers may choose to self-escort; however, police assistance may be required at specific points.
**Medium-Low Risk (Light Green)** – Hauliers should consider Self-Escort for the vehicle
**Low Risk (Dark Green)** – No Escort Required

| | A14 | A12 Lowestoft to Leiston | A12 Woodbridge to Leiston | B1122 Lovers Lane | A145 |
|---|---|---|---|---|---|
| VR1 | | | | | No AILs Permitted |
| Special Order | | | | | No AILs Permitted |
| STGO Cat 3 | | | | | No AILs Permitted |
| STGO Cat 2 | | | | | No AILs Permitted |
| STGO Cat 1 | | | | | No AILs Permitted |
| >5m wide | | | | | No AILs Permitted |
| 4.4m - 5m wide | | | | | No AILs Permitted |
| 3.5m - 4.4m wide | | | | | No AILs Permitted |
| 2.9m - 3.5m wide | | | | | No AILs Permitted |
| <2.9m wide | | | | | No AILs Permitted |
| Length <18.64m | | | | | |
| Length between 18.65m - 27.3m | | | | | No AILs Permitted |
| Length between 27.4m – 30m | | | | | No AILs Permitted |
| | A14 | A12 Lowestoft to Leiston | A12 Woodbridge to Leiston | B1122 Lovers Lane | A145 |

Figure 6.1: AIL Management Matrix

6.4.9 The categories of AIL anticipated for the SZC project have been applied to the standard guidelines for each section of the access routes. A pragmatic risk assessment has informed when the Constabulary considers AILs should either be allowed to travel to the main works site or associated developments without a private escort; when a private escort would be required; when a Police escort would be required; or police assistance advised.

6.4.10 The Matrix proposed sets out the risk assessment and application of the guidelines. During the construction of SZC this matrix would be applied to all AILs using the defined routes, irrespective of their association with SZC. The matrix provides a guide as to the escorting of AILs. However, as with all AIL movements these are subject to the final sign off by the Abnormal Loads

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

6.4.11 The proposed matrix reflects an increased intervention by the Constabulary to assist with the more efficient and safe operation of AILs to SZC both prior to and following the mitigation measures proposed by the Applicant. The construction of the Two Villages' Bypass and the Sizewell Link Road ('SLR') will circumvent some areas of safety concern along the access corridors but will not remove all concerns or remove all points at which AILs would be required to contravene road regulations. There would, therefore, continue to be a much-increased demand on the Constabulary's Abnormal Loads unit and associated trained officers.

6.4.12 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day (*EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021*). These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.

6.4.13 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL movements requiring police escort during the SZC construction period. Additional resources are therefore required, in the form of a dedicated AIL Unit, to allow the Constabulary to facilitate the proposed construction period for SZC and associated passage of AILs along Suffolk's road network in an efficient and safe manner.

6.4.14 The Applicant has commissioned Wynns Limited to prepare a review of the feasibility of the use of the identified AIL access routes by selected types of vehicle and load combinations (*Abnormal Indivisible Load (AIL) Access Report Sizewell C – 07.04.21 – copy currently provided informally by EDF).* That report identifies a series of challenges with access to SZC where AILs would be required to occupy the full width of the road and could oversail beyond the carriageway. It indicates that vehicle and load combinations would be required to use dedicated AIL infrastructure and over-run areas within modified and new junctions. Where AILs are required to operate in this manner, it is essential for police escorts to safely manage the network around that movement. The Wynns report substantiates the Constabulary's concerns.

# 7 Population Based Community Safety and Policing Impacts

## 7.1 Overview

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

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

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

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

## 7.2 Local Policing

### Existing Demand and Resourcing

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

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

### Operational Structure

7.2.3 In 2019 police officers dealt with 80,102 investigations. The Constabulary currently has an establishment of 1,219 FTE[15] police officers that provide 24-hour coverage throughout the year. This equates to each police officer dealing with an average of 65.7 investigations in a year, which is one of the highest workload figures for policing in England.

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

- **Neighbourhood Response Teams (NRTs):** Any urgent graded calls into the CCR will be allocated to the NRT's. The NRT officers aim to arrive at the scene of an incident within 15 minutes in an urban area or 20 minutes in a rural location from the time of the call. The range of incidents that NRT's respond to can be anything from missing people, reports of crime where incidents are occurring at the time, mental health, road traffic collisions and incidents that are time critical.

- **Safer Neighbourhood Teams (SNTs):** SNT's work alongside the NRT's to provide a community policing team that manages longer-term community problems. The issues can range from neighbourhood disputes to complex and protracted community issues that require a substantial amount of resources and time, often engaging other key partners, to resolve.

- **Criminal Investigation Department (CID):** CID will normally investigate and manage more complex criminal investigations including domestic burglaries, high value acquisitive crime, robberies, high value fraud and investigations where there is high risk of harm including stalking and harassment cases.

- **Safeguarding Investigation Unit (SIU):** The SIU will investigate criminal cases where the allegation is of a serious sexual nature or its involving child abuse. The SIU has officers who work closely with the social services team

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

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

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

Table 7.1: Local Policing Resources

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

### Existing Demand

7.2.6 Demand on local policing includes the following:

- **Criminal investigations**: in 2019, there were 1,120 criminal investigations recorded within the Leiston SNT area; accounting for 10% of total number of criminal investigations recorded for Eastern Policing Area that year and 2% of the total for the whole of Suffolk.

- **Non-crime investigations**: involve crimes or incidents that do not need to be reported to the Home Office (non-notifiable) but still need to be recorded, such as domestic violence, child protection investigations, ASB, missing person investigations and mental health calls

- **Other additional demands**: five additional key areas which have an impact on police resources: Mental health episodes, suicides, missing person investigations, unmeasured demand and community tensions/liaison. The demand generated by these events are not recorded in the crime or non-

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

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

### Forecast Demand from Construction Workforce

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

7.2.9 For brevity Table 7.2 overleaf presents the annual average staffing requirement. It should be noted that the Constabulary has also modelled 6 month split average resourcing periods to which more closely tracks fluctuations in demand.

Table 7.2: Predicted Average Annual Local Policing Demand

| Construction Year | Average Annual NHB Workforce | NHB Criminal Investigations | NHB Non-Crime Investigations | NHB Missing Person Investigations | NHB Mental Health Callouts | Family Criminal Investigations | Family Non-Crime Investigations | Family Missing Person Investigations | Family Mental Health Callouts | Combined Increase in Criminal Investigations | Combined Increase in Non-Crime Investigations | Combined Increase in Missing Person Investigations | Combined Increase in Mental Health Call Outs | Total Increase in Local Policing Demand | Local Policing Officer Workload | Local Policing Officers FTE Requirement |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **1** | **524** | 76 | 13 | 1 | 2 | 8 | 3 | 1 | 1 | 84 | 16 | 2 | 3 | 105 | 65.7 | 2 |
| **2** | **1062** | 154 | 25 | 2 | 4 | 16 | 5 | 1 | 1 | 170 | 30 | 3 | 5 | 208 | | 4 |
| **3** | **2134** | 309 | 50 | 3 | 7 | 32 | 10 | 2 | 2 | 341 | 60 | 5 | 9 | 415 | | 7 |
| **4** | **3019** | 436 | 70 | 5 | 10 | 45 | 14 | 3 | 2 | 481 | 84 | 8 | 12 | 585 | | 9 |
| **5** | **4347** | 628 | 100 | 6 | 14 | 65 | 20 | 4 | 3 | 693 | 120 | 10 | 17 | 840 | | 13 |
| **6** | **5024** | 726 | 116 | 7 | 16 | 75 | 23 | 5 | 4 | 801 | 139 | 12 | 20 | 972 | | 15 |
| **7** | **5780** | 835 | 133 | 8 | 18 | 86 | 27 | 6 | 4 | 921 | 160 | 14 | 22 | 1117 | | 17 |
| **8** | **4726** | 683 | 109 | 7 | 15 | 71 | 22 | 5 | 3 | 754 | 131 | 12 | 18 | 915 | | 14 |
| **9** | **2721** | 393 | 63 | 4 | 9 | 41 | 13 | 3 | 2 | 434 | 76 | 7 | 11 | 528 | | 9 |
| **10** | **920** | 133 | 22 | 2 | 3 | 14 | 5 | 1 | 1 | 147 | 27 | 3 | 4 | 181 | | 3 |
| **11** | **589** | 86 | 14 | 1 | 2 | 9 | 3 | 1 | 1 | 95 | 17 | 2 | 3 | 117 | | 2 |
| **12** | **283** | 41 | 7 | 1 | 1 | 5 | 2 | 1 | 1 | 46 | 9 | 2 | 2 | 59 | | 1 |

## 7.3 Custody Management

### Existing Demand and Resourcing

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

### Operational Structure

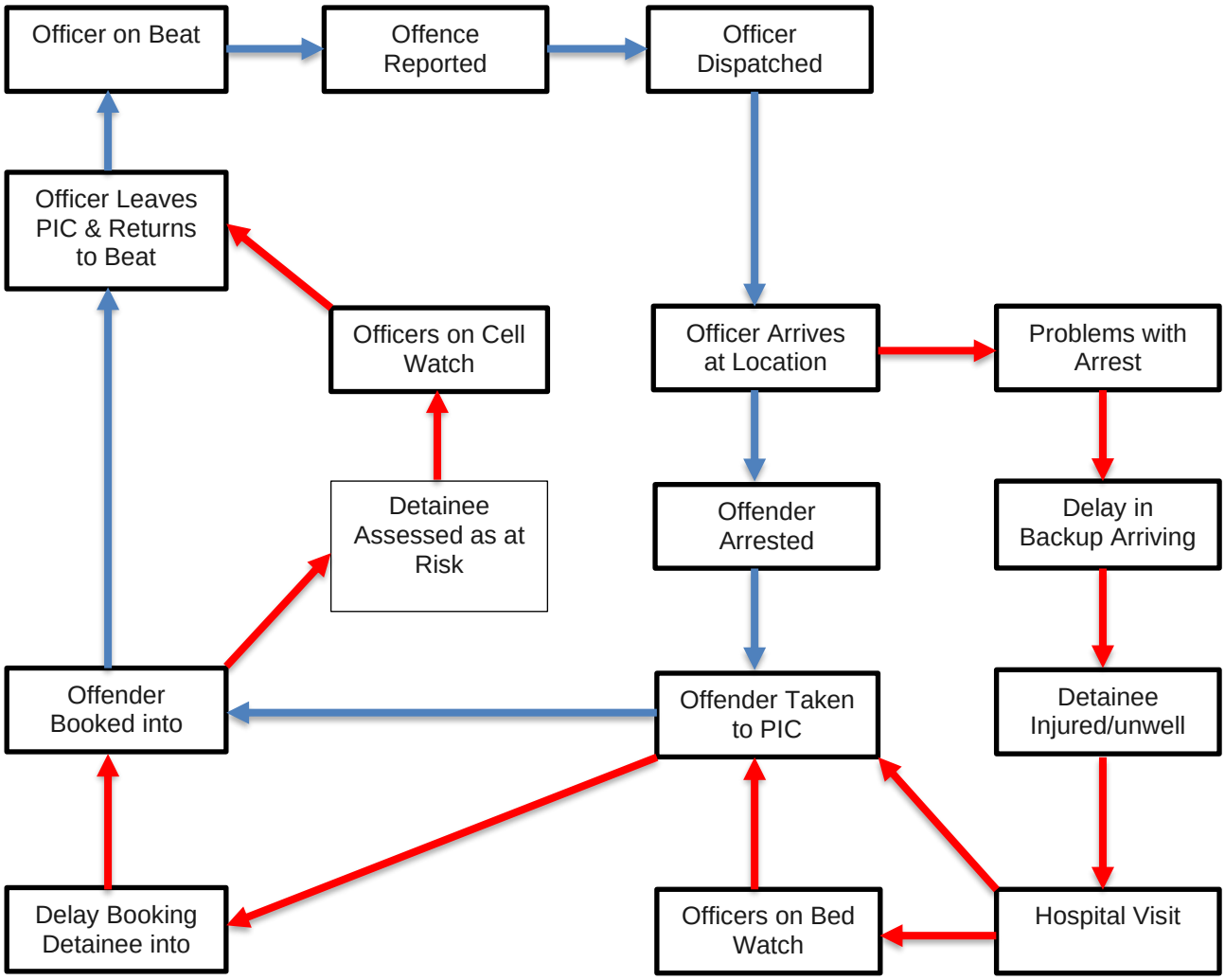
7.3.2 Custody for the Halesworth police jurisdiction is covered by all three of the Constabulary's Police Investigation Centres (PIC): Bury St Edmunds (approximately 44 miles), Martlesham (approximately 19 miles) and the last at Great Yarmouth (approximately 33 miles). The PIC at Great Yarmouth is shared with Norfolk Constabulary.

7.3.3 Each PIC is staffed by police officers and staff, but due to the specialist nature of the work conducted in the PIC, these resources need specific training to the agreed national level. This means that the staff capable of working within a PIC are restricted; not all staff can work duties that fall within the PIC.

### Custodial Process

7.3.4 Upon arrest the arresting police officers are directed to the nearest PIC with capacity and cell space in order to book the detainee into custody and follow a set of statutory actions under the Police and Criminal evidence Act 1984. For this reason, whilst the three PICs have distinct geographical locations, custody is treated a county wide resource as an arrested person could be sent to any of the PICs.

7.3.5 As Figure 7.1 shows, arrests are by nature time consuming and resource intensive - particularly as the Constabulary policy requires a minimum of two officers to transport the detainee to the closest PIC with capacity. The blue arrows show a typical arrest while the red show some of the difficulties and delays officers can face during the arrest process.




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

Figure 7.1: Arrest process

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

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

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

[16] 45 minutes minimum travel time to the nearest PIC with capacity, 30 minutes hand over/booking in time to transfer the detainee to custody followed by 45 minutes travel back to base/officer beat.
[17] 60 - 90 minutes travel to the nearest hospital to the destination PIC, 3-hour triage waiting time in A&E (NHS average A&E waiting time 2018, NHS Digital and NHS England), 15 minutes travel time from hospital to PIC. 1 – 2 hour waiting time to book in detainee during busy periods, 60-minute drive back to base/officer beat.

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

### Current Resource Capabilities

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

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

Table 7.3: Current custody staffing levels

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

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

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

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

### Existing Demand

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

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

### Forecast Demand from Construction Workforce

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

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

Table 7.4: Predicted Average Annual Custody Demand

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

## 7.4 Contact and Control Room

### Existing Demand and Resourcing

7.4.1 The Constabulary's Contact and Control Room ('CCR') at the Constabulary's Headquarters, Martlesham, handles all calls and co-ordinates action taken by the Constabulary's, including but not limited to responding to emergency incidents. This section outlines the Constabulary's current demand and resourcing structure in respect of CCR before setting out forecasted additional demands likely to be generated by SZC.

7.4.2 In 2019 there were 110,448 999 calls handled by the CCR in the Constabulary. This is the equivalent of 302 emergency calls every day throughout the year. Contact with the CCR is often the first point of engagement with the Constabulary and those calling are often in a state of high anxiety. It is therefore imperative that the appropriate level of service is afforded at this critical junction as a 'right service at first point of contact', approach leads to reduced demand on resources further on. The PCC requires the Constabulary to answer 999 within a set time; performance against this is reported regularly and the Chief Constable is held to account on meeting this target.

7.4.3 The Constabulary's CCR is presently operating at capacity – any increase in call volume will impact the Constabulary's continued ability to respond to 999 (emergency) and 101 (non-emergency) calls within the mandatory response times set out by the government[18]. The current performance target is 90%, the Constabulary are currently averaging a 91% call answering target. Any additional calls generated by SZC will negatively impact the Constabulary's continued ability to meet this target. A rise in call volume will also have implications for local policing services and the Crime Co-ordination Centre ('CCC') which deals with volume crime and non-emergency crime reports. An increase in calls to the CCR will have a corresponding increase in the demand managed by the CCC.

### Call Triage Process

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

[18] 999 calls should be answered within 10 seconds

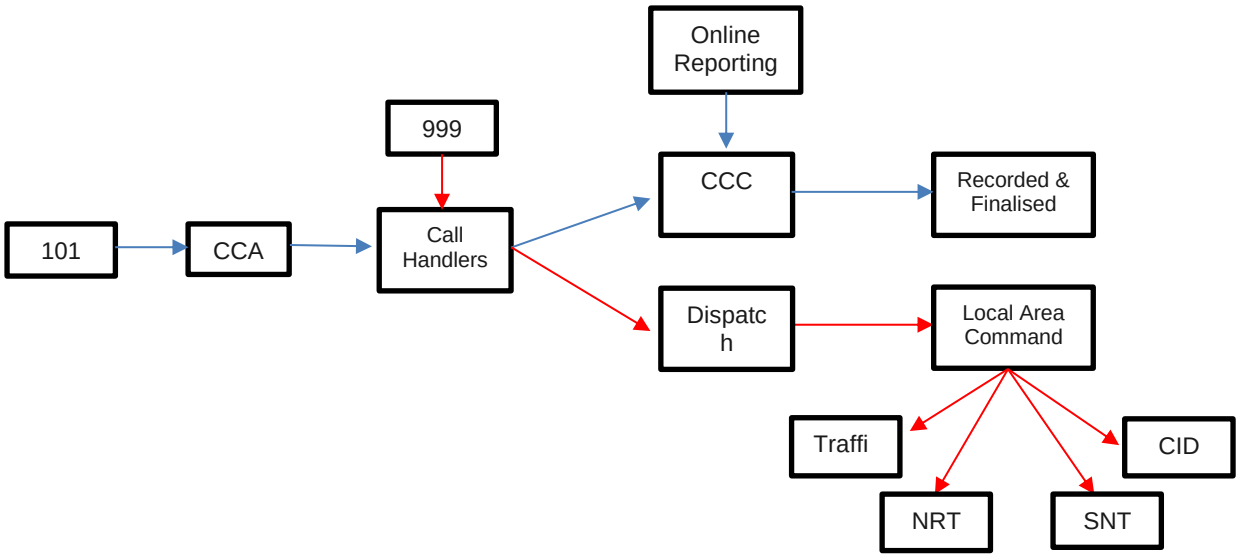



Figure 7.2: Call Triage Process

- **Emergency calls follow the red arrows**: 999 calls go direct to the call handlers where they are assessed. If an immediate response is needed, the call is passed to the dispatch team who then contact and direct the most appropriate operational resources in the area where the emergency is. If a unit is available to respond to the call they are then assigned a Computer Aided Dispatch ('CAD') and dispatched to the address of the incident.

- **Non-emergency calls follow the blue arrows**: 101 calls go first to the Central Call Answering switchboard ('CCA') where they are then assessed and passed to the call handlers. If it is an emergency then the call is passed to dispatch. If it is a call to report an offence or give intelligence, but is not an emergency, then the call is passed to the CCC for recording and finalisation.

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

### Current Resource Capabilities

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

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

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

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

### Existing Demand

7.4.8 In 2019 there were 132,847 non-emergency (101) and 110,448 emergency (999) calls recorded by the Constabulary, equating to 666 calls per day. Over the last five years there has been a 40% increase in the number of 999 calls to the Constabulary with an average annual increase of around 8%.

7.4.9 his is the equivalent ratio of one call to every six people in Suffolk (18%). CCC handle on average approximately 35,000 CAD[20]s per year. This is the equivalent of one CAD for every 22 people in Suffolk[21]. The current caseload of a CCR call handler is 2,010 calls annually. CCC staff handle, on average, 894 cases a year. Appendix F provides a detailed assessment of recent demand for CCR and CCC in Suffolk.

### Forecast Demand from Construction Workforce

7.4.10 With suspect age and gender weightings applied, the expected population increase of non-home-based workers (5,884) at peak would likely see a minimum upsurge in the number of calls by 2,261 at peak – equivalent to the caseload of 1.1 FTE CCR call handlers. At the same time, there would be an anticipated increase of CADs by 322 – equivalent to the caseload of 0.4 FTE CCC staff.

7.4.11 Table 7.5 shows the level of resourcing required within custody management to address the predicted annual average NHB workforce over the anticipated 12-year construction programme. The level of resourcing in terms of FTEs is rounded up to the nearest post if the demand generated meets or exceeds 0.2 FTE.

[20] CAD stands for Computer Aided Dispatch
[21] Or 4.6% of the 2018 estimated population of Suffolk.

Table 7.5: Predicted Average Annual CCR and CCC Demand

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

# 8 Construction Traffic Based Community Safety and Policing Impacts

## 8.1 Overview

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

## 8.2 Baseline Traffic Related CADs

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

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

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

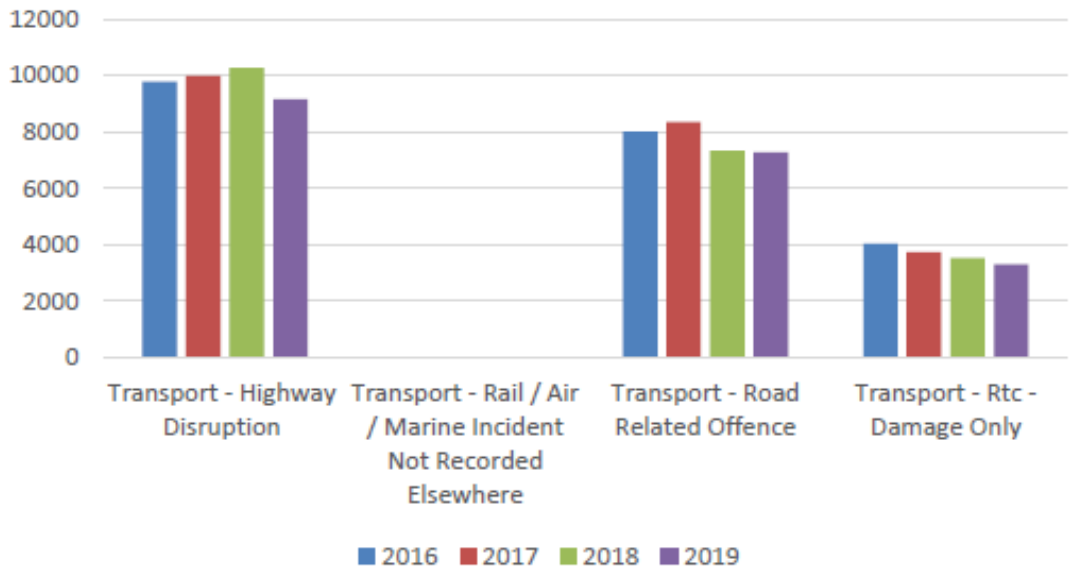



Figure 8.1: Traffic CAD Breakdown (2016 – 2019)

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

## 8.3 Roads Policing Impacts from SZC

### HGV Traffic

8.3.1 Information provided by the Applicant within the submitted SZC DCO application (as updated) and through a response to written clarifications from the Constabulary[22] unfortunately does not confirm whether the proposed cap on HGV movements associated with the construction of SZC (not including the off-site facilities) include AIL movements. Irrespective, the Applicant predicts within its revised evidence that HGV movements at the SZC main development site would be capped at 500 HGVs (250 HGVs in and 250 HGVs out) on a typical day and 700 HGVs (350 HGVs in and 350 HGVs out) on a peak day**.** The Applicant acknowledges that this flow distributed as per the submitted Transport Assessment will generate significant increases in the percentage of HGV traffic on the roads used to access SZC. The percentages are open to interpretation between the Applicant and the Constabulary but the Applicant is currently predicting the range is from 19% on A12 north of Yoxford to 147% on A12 south of Yoxford, prior to the implementation of the SZC Link Road (SLR). At the site access the increase in HGV percentage is 284% in the morning peak period and 647% in the evening peak period.

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

### Road Safety

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

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

8.3.4 To assist with understanding the impact of HGV movements on the access corridors to the SZC project, the Constabulary has obtained personal injury collision statistics relating to HGV involvement from the Department for Transport (DfT) database[23], for the most recent six-year period (1 January 2014 to 31 December 2019).

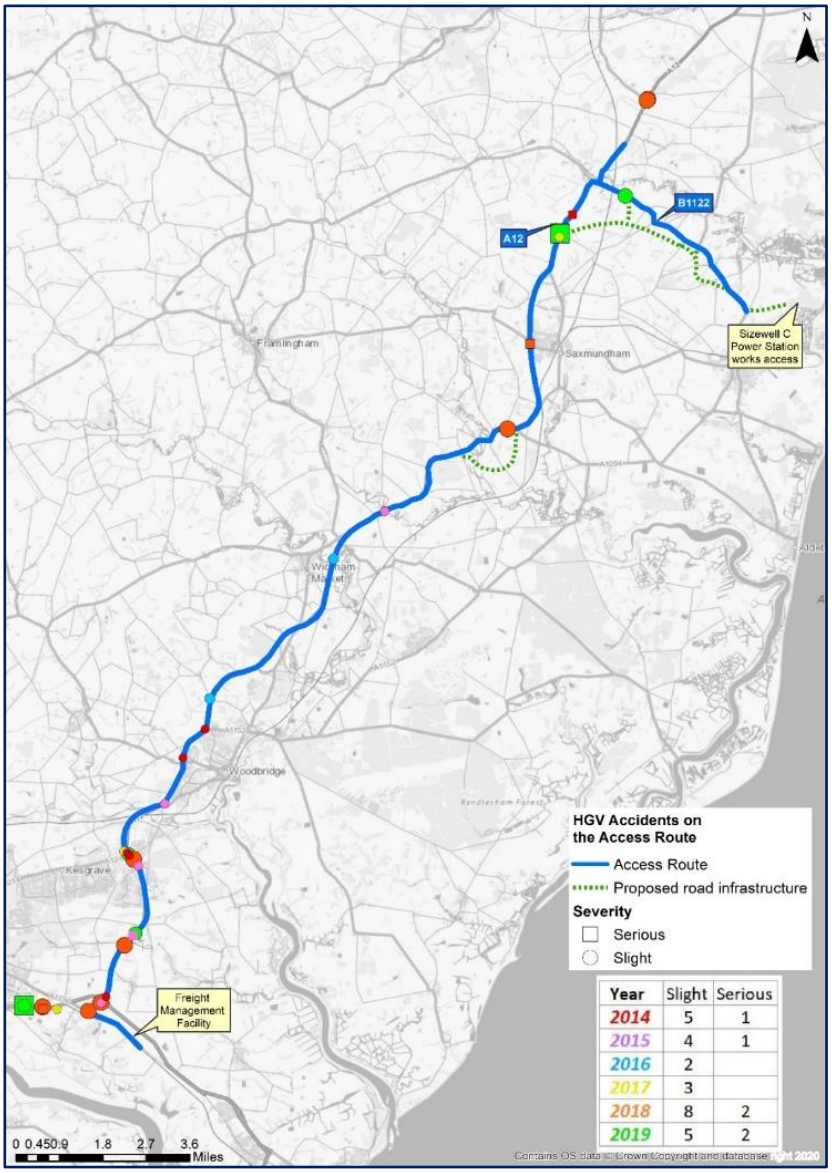



Figure 8.1: Collisions involving HGVs by location, year, and severity

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

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

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

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

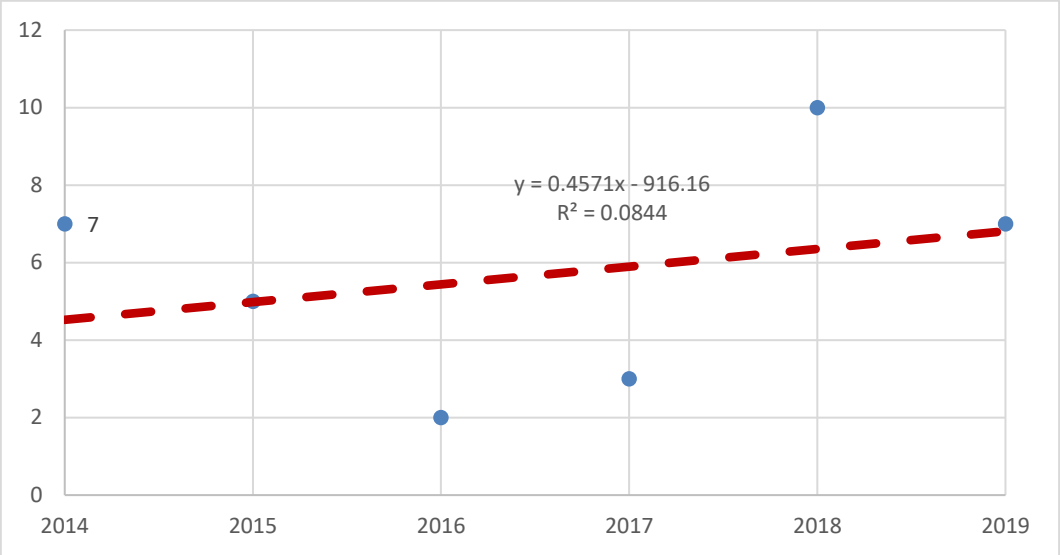



Figure 8.3: Collisions involving HGVs per year and 'fitting line'

8.3.7 The model shows an upward trend predicting 9 and 11 collisions for 2023 and 2028 respectively. This prediction does not take account of the increased number of HGVs and AILs on the network nor the increase in the proportion of HGVs within the total traffic flow that would be generated by SZC and consented developments. If collisions involving HGVs were to rise pro rata with the increase in HGV flow, then the number of incidents per year could treble. However, it is also acknowledged that the projection has not taken into consideration the proposed mitigation measures of the Sizewell Link Road or Two Villages' Bypass intended to reduce the effect of HGVs or AILs movements, albeit it is noted that only two collisions involving HGVs were recorded within the sections of route affected by the mitigation.

8.3.8 A cluster of six collisions involving HGVs was recorded, during the studied period, close to the A12/ A1214 roundabout east of Kesgrave. Of note is a further cluster of four collisions recorded close to or on the A12 / A14 roundabout (Seven Hills Interchange). Finally, three further collisions involving HGVs occurred on the west approach to the A12 / A14 roundabout.

8.3.9 Whilst the Two Villages' Bypass would circumvent challenging sections of the access route and the Sizewell Link Road would minimise the impact of the Project generated traffic in Yoxford, the data indicates that there are points along the corridor that have collision challenges that have not been mitigated and will be heightened by the increase in the number and proportion of HGVs within the traffic flow.

### AIL Movements

### Context

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

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

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

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

### Network Risks

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

**Early years (2023)**

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

**Peak construction (2028)**

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

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

[24] *'The Road Vehicles (Construction and Use) Regulations 1986'*, Source: https://www.legislation.gov.uk/uksi/1986/1078/contents/made
[25] *' The Road Vehicles (Authorised Weight) Regulations 1998'*, Source: https://www.legislation.gov.uk/uksi/1998/3111/contents/made

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

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

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

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

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


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

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

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

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



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

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


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

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

### Emergency Services Response Reliability and Times

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

### AIL Escorting

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

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

8.3.24 The Applicant has previously proposed in its consultation material that all AILs should be escorted by the Police. Conversely the agreed strategy adopted at HPC was for AILs over 4.6m to be escorted. The Applicant has subsequently revised its opinion and is now not proposing that all AILS would be escorted by the Police. The Constabulary's matrix reflects these points and the experience of escorting along the A12 and B1122 such that the Constabulary's position is now to require all AILs over 4.4m to be escorted along the A12 and all AILs over 2.9m along the B1122 during the period of construction of SZC. The Constabulary's welcomes on-going dialogue with the Applicant in order that the appropriate solution for AIL movements, ensuring safety for all road users, can be sought.

8.3.25 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day *(EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021).* These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.

8.3.26 It is acknowledged that some AILs would not necessarily or typically require escorting from the A14 dual carriageway and on dual carriageway sections of A12. The Constabulary is aware that there are currently no suitable meeting places along the A12 where an AIL convoy could meet a Police escort unit. The Applicant has undertaken to review this position. If a suitable location to meet AILs can be established prior to Woodbridge then it would be possible to reduce the distance over which the Police escort should be required. For AILs travelling south from Lowestoft the strategy would be that escorted vehicles would be met at the port, subject to the Applicant's confirmation of the strategy to move AILs from Lowestoft. Under the co-ordination and guidance of a Police escort, if necessary, two AIL vehicles could travel in convoy along the access route in a single convoy helping to enhance the number of AILs that can access the works. This type of operation is more practicable under Police escort but smaller AILs could also travel in convoy under private escort.

8.3.27 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL

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

# 9 Mitigation and Monitoring

## 9.1 Local Policing

### Summary of Resourcing Requirements

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

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

| Construction Year | Local Policing | | Custody | | CCR | | CCC | |
|---|---|---|---|---|---|---|---|---|
| | Incidents | FTEs | Incidents | FTEs | Incidents | FTEs | Incidents | FTEs |
| 1 | 105 | 2 | 35 | 1 | 543 | 1 | 78 | 1 |
| 2 | 208 | 4 | 53 | 1 | 716 | 1 | 103 | 1 |
| 3 | 415 | 7 | 89 | 1 | 1,060 | 1 | 152 | 1 |
| 4 | 585 | 9 | 118 | 1 | 1,343 | 1 | 192 | 1 |
| 5 | 840 | 13 | 163 | 2 | 1,768 | 1 | 252 | 1 |
| 6 | 972 | 15 | 185 | 2 | 1,986 | 1 | 283 | 1 |
| 7 | 1117 | 17 | 210 | 2 | 2,227 | 2 | 317 | 2 |
| 8 | 915 | 14 | 175 | 2 | 1,890 | 1 | 269 | 1 |
| 9 | 528 | 9 | 108 | 1 | 1,248 | 1 | 178 | 1 |
| 10 | 181 | 3 | 48 | 1 | 671 | 1 | 96 | 1 |
| 11 | 117 | 2 | 37 | 1 | 565 | 1 | 81 | 1 |
| 12 | 59 | 1 | 27 | 1 | 347 | 1 | 67 | 1 |

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

### Police Estate Requirements

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

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

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

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

### Estates Footprint Within Leiston

9.1.6 It is important that any additional estates requirement reflects where the uplift in additional resources is needed, and where practicable those additional officers are within that community and available for their needs when addressing the increase in demand pertaining to SZC during the build programme. **Therefore, the Constabulary will seek an estate footprint within Leiston to maximise the operational effectiveness and efficiency of additional resources funded by the Applicant. This approach will also make it clear to the local community that the additional resources funded through the mitigation provided by the Applicant are indeed there to address net additional community safety risks resulting from the SZC project.**

9.1.7 The provision of the enhanced police estate during the building of SZC will send a clear message to the community that the Constabulary and the Applicant recognise the impact of SZC and are taking proactive steps to ensure that any increase in demand on police services is being addressed, at a local level and that the core uplift in additional police resources will be based within their community.

9.1.8 It is recognised by the Constabulary that any additional estates requirement for the housing of the uplift in police resources required during the building of SZC, will no longer be required once SZC has been built. Therefore, the Constabulary has sought to reflect this through a temporary solution and use of a portacabin solution, the Constabulary will not seek the costlier solution of a permanent build which will be surplus to requirement once the building of SZC has been completed.

9.1.9 A suitable location for a temporary police facility has been identified within the curtilage of the Leiston Sports and Social Club. The rational for this location is that:

- The overt location of the facility will reaffirm the key message that the additional police resources within the community, as a result of mitigation provided through SZC, are there for the community and so located within the community.

- The Sport and Social Club has adequate space and parking to house the premises that will be used by the uplift in SNT and NRT resources, so reducing costs.

- The strategic location provides prime access to the existing and emerging community for the uplift in SNT and NRT officers

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

Table 9.2: Estates Resources Required

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

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

### Estates Footprint Within SZC

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

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

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

### Summary

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

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

### Operational Delivery

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

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

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

### Dedicated Resources for the Leiston SNT

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

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

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

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

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

### Additional Resources for the Neighbourhood Response Team

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

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

### Monitoring

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

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

### Contingency for Additional Potential Community Safety Risks

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

### Summary of Required Local Policing Resources

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

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

Table 9.3: Summary of resourcing strategy

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

## 9.2 Roads Policing

### Resourcing Requirements

9.2.1 Escorting AILs is resource intensive for the Constabulary. The Roads Policing team ('RAPT') is a joint team shared between Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled impact the operational number of RAPT officers who can be rostered for normal duties[26].

9.2.2 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The size of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Table 9.4 shows the number of movements that could be escorted depending upon the size of the team.

Table 9.4: AIL Team Resourcing Model

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

9.2.3 Table 9.4 illustrates the AIL movements feasible with different dedicated AIL team models. The AIL team agreed with the Applicant that they will need to consider the number of AIL movements required and the Applicant's acceptance in the delay of these movements if the team is not of an appropriate size.

9.2.4 The Applicant should confirm to the Constabulary when the SZC requirements exceed the data provided, or the Applicant feels that the requirements could potentially be higher than that expressed in the DCO. The size of team will need to allow the Constabulary to resource demand peaks and to provide support to the mitigation required when addressing the additional roads policing cover that will be needed for the additional traffic on the network resulting from the construction of SZC. When officers in the AIL team are not required for escort duties, they will carry out enhanced high visibility patrols, driver, and vehicle safety tests, attend collisions and monitor the vehicles for speeding or

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

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

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

### Proposed Approach

9.2.6 It is the policy of the Constabulary to only move AILs during daylight hours due to the increased risk of moving AILs by night. As such it is proposed that the AIL team works a shift pattern which optimises the number of AIL movements within national policy guidance and that of the Constabulary.

9.2.7 It must be stressed that the size of the AIL team will be driven by data provided by the Applicant. It should also be noted that Police Regulations mean that officer shifts can only be changed with 90 days' notice. Therefore, quality of data provided by the Applicant and effective timely communication are very important. Where the number of AILs requiring movement is above that modelled by the Constabulary, based on the data provided by the Applicant, and the capacity of the dedicated AIL resource will be insufficient to manage this. In this case the movements will be managed through existing roads policing resources and scheduling with all other AIL requirements.

9.2.8 The increased number of AILs and HGVs on the network will require more detailed co-ordination and collaboration with the existing the Abnormal Loads Officer who will continue to manage the "business as usual" movements but with additional pressure on roads management and timings to avoid conflicts. This will require scrutiny of the submissions made with an uplift in quality of submissions and more advanced notice to allow for resource planning and adherence to proposed movement dates.

9.2.9 The co-ordinated system will need to be able to flex to changes in programme or short notice. This could require temporary adjustments in the resources to assist with planning for major movements which might require extra management e.g. at peak periods with high numbers of AILs/day or with extra wide / long loads where more intervention is required.

9.2.10 AIL movements would continue only to be permitted in accordance with the hours set out in the current Policy. The Constabulary would be prepared to review this position subject to further analysis of traffic patterns along the access corridor. This might reflect the demonstration of peak period spreading as a consequence of new commuting patterns or during holiday periods.

9.2.11 The strategy would need to be flexible to adapt to operational challenges that might occur during the life of the construction process. Those operational challenges would be managed through a strengthened and detailed Traffic Incident Management Plan concluded through the DCO process. The plan would need to reflect the use of the FMF and P&R sites and how they would assist with the operation of HGV and AIL traffic during incidents.

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

9.2.13 The Constabulary is also prepared to reflect on the evidence from the operation of the proposed resource schedule and to consider reducing the dedicated resources if it is shown that the project no longer requires that level of resource. The Applicant must understand that replacing that reduced resource would be the subject of further negotiations and suitable funding. That revised position would require mobilisation time.

### Summary

9.2.14 The Constabulary has concluded that the implications of the governance and management of the AILs associated with the construction of the SZC project will require significant dedicated resources and resilience within that resource. That resource will be able to assist the Applicant in the efficient delivery of the Project whilst helping to achieve safe and efficient operation of the affected road network.

9.2.15 As demonstrated through this WR, the escorting of AILs is resource intensive for the police. It means the abstraction of multiple officers from their usual duties or those officers working overtime. Any increase in the number of AILs requiring police escorts will place considerable strain upon the Constabulary resources. Even if costs for staff used are recouped, due to the abstraction of officers and the implications of overtime on work rosters in accordance with the Government's 'Working Time Directive, there is not capacity within RAPT to address the increase in demand from SZC. Failure to resource to the appropriate levels will adversely impact upon the efficient movement of AILs and will affect the safety of the Suffolk road network. In view of the volume of AIL movements pertaining to SZC there is not existing capacity within the Constabulary to manage this demand.

9.2.16 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The construct of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Should the number of AILs exceed the agreed numbers modelled, the Constabulary could not facilitate those movements and those movements could

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

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

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

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

A.1.1 This Policing Impact Assessment (PIA) is underpinned by a model which the Constabulary has developed to predict likely local policing demands and associated resourcing requirements based on non-home based (NHB) workforce data provided by the Applicant and baseline demographic conditions within Suffolk. The Constabulary has engaged with the Applicant over a period of 24 months to develop and refine the PIA.

A.1.2 This appendix outlines refinements made to the model throughout its development to accommodate requests from the Applicant. These include:

- **Resourcing workforce benchmark**: the Constabulary has a long-established practice of undertaking resource planning at the predicted peak requirement of planned events to ensure sufficient police resourcing is in place to address predicted peak community safety impacts.

A.1.3 Following discussions with the Applicant and detailed resource demand modelling using NHB monthly figures (EDF, July 2020), the Constabulary has developed an approach which accommodates the Applicant's request that the annual average NHB workforce is used to calculate impacts. The approach is underpinned by use of the National Police Chiefs Council (NPCC) standard officer cost rate.

- **Recruitment periods:** as a police force which recruits cohorts of officers at the same time, the Constabulary has limited flexibility over recruitment to respond to month-to-month changes in demand arising from the changing NHB workforce. This was originally factored into the model through one recruiting period a year for additional resourcing.

A.1.4 Following discussions with the Applicant, the Constabulary has now modelled two recruitment periods in the year.

- **Whole post resourcing:** related to the above and in accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.

A.1.5 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.

A.1.6 Finally, the model originally included an allowance for additional community safety risks that could occur and, if so, *would* require additional resourcing, in addition to likely significant effects that are predicted and *will* require additional resourcing.

A.1.7 Following discussions with the Applicant, these have been removed from the Constabulary's base model. Monitoring and contingency to mitigate the additional community safety risks should now be provided as necessary through the Applicant's Community Safety / Public Services Resilience Fund rather than upfront resource funding direct to the Constabulary.

A.1.8 This change has been facilitated by refining the structure of the model to predict policing demand and resourcing arising from SZC more accurately, including peak months, which is now based on 6-month average demand.

# Appendix B Comparison Maps

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

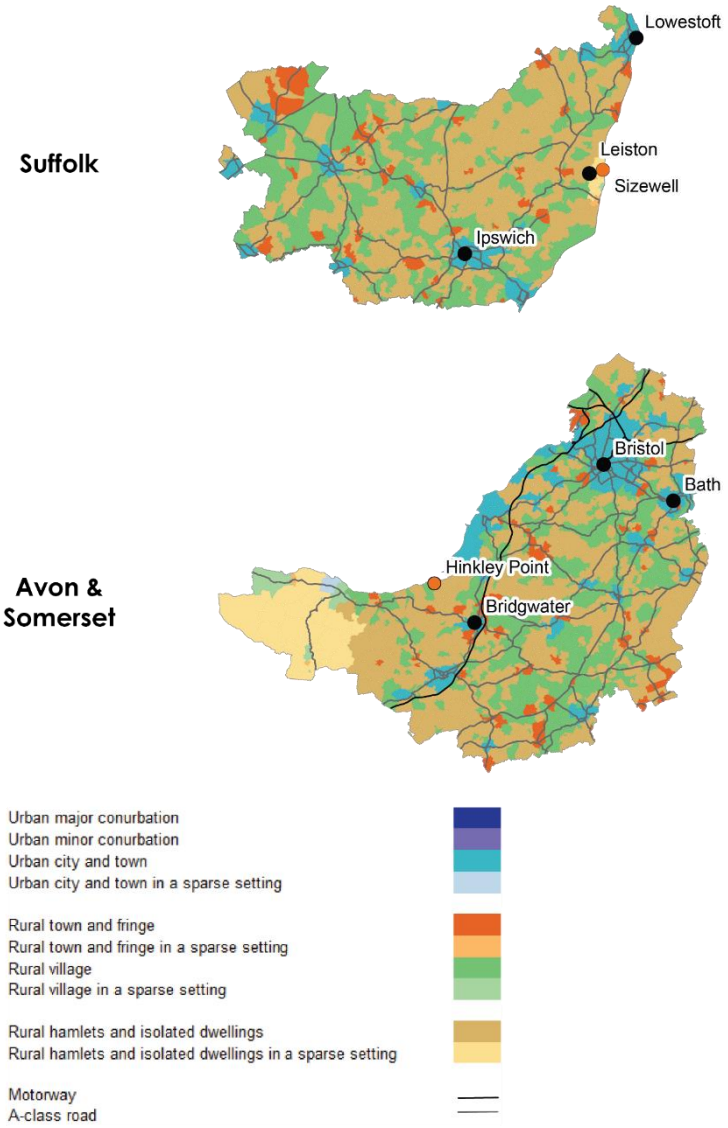



Figure B.1: Comparison Map

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

# Appendix C SEAG Crime Classifications and Resource Allocation

| SEAG Crime Classifications | Initial response (After CCR) | Department Responsible for continued investigation | Examples of where this could affect policing resources outside of SZC Beat Team. |
|---|---|---|---|
| **Criminal Damage** | SNT/NRT | SNT/NRT | Damage caused within the accommodation, site or wider community. |
| **Drugs** | SNT/NRT/Pro-active Team | SNT/NRT/Pro-active Team | Drugs used for recreational use off site, in particular around Night Time Economy (NTE). |
| **Assault** | SNT/NRT | Depends on the level of Injury<br>• Common Assault – SNT/NRT<br>• Actual Bodily Harm – SNT/NRT<br>• Grievous Bodily Harm - CID | Violence used by or directed at workers on and off site, including domestic abuse, NTE and off-site tensions.<br>(A&S had an incident at their campus which involved wider non-funded resources to break up) |
| **DA** | NRT | Depends on the nature of the incident(s)<br>• NRT will investigate the majority of the incidents<br>• CID may investigate the higher risk DA | Suffolk's policy is to take positive action around all DA related matters. Due to the threat and risk DA imposes, NRT would ordinarily be dispatched to attend near on all DA matters. This will include crimes/non-crimes with family and any intermate partners (regardless of the time spent within the relationship). |
| **Harassment** | SNT/NRT | Depends on the level and circumstances of harassment (includes stalking)<br>• SNT/NRT will investigate harassment<br>• SNT/NRT will investigate harassment/stalking (Sec2A) with CID oversight<br>• CID will investigate harassment/stalking (Sec4a). | Any reports of harassment will be taken seriously. Any reports of harassment on site may well be investigated by the SZC team, any off-site reports may well be investigated by other units. Specialist trained officers may well be required to help with complicated electronic related lines of enquiry. |
| **Public Order** | SNT/NRT/CID | SNT/NRT will investigate lower level public Order (Affray, Sec4 and 5)<br>CID will investigate anything more serious (Affray/Violent disorder and Riot) | Public Order incidents can occur anywhere in public, but could be more prevalent in the evenings linked to NTE. Alcohol could be a contributing factor. |

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

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

- Any reported incident to the Constabulary will be assessed within the control room and graded based upon the THRIVE principle (Threat, Harm, Risk, Investigation, Vulnerability, Engagement).

- Any urgent response will require the Neighbourhood Response Team (NRT) to attend. (Grade A and B). The Safer Neighbourhood Team will not normally be asked to attend urgent incidents, unless NRT require support.

- The majority of the crime / non-crime categories within the A&S SEAG returns would require NRT assistance should they be reported in Suffolk.

- There will be various crimes which will be investigated by other specialist departments. The majority of the time, these incidents are first responded to by NRT to mitigate any threat, safeguard the victim and preserve evidence early. Therefore, even though some of the crime will be allocated to the beat team or transferred to specialist units the initial actions are conducted by local policing units.

- The incidents reported into the A&S SEAG show that investment is required within the NRT. The beat team cannot deal with a large proportion of the incoming demand due to staffing numbers, limitation of hours, limitation of skills/knowledge/experience and limitations of the role profile.

- The crime categories used in the A&S SEAG are very general and broad. They do not break the crime category down into subcategories which would then provide the detail to show which department is investigating.

# Appendix D Example of Need for Resources outside HPC Beat Team

D.1.1 One example of both the limitations of relying on automatic tagging to attribute incidents and the need for specialist policing resources to address additional demand arising from HPC outside of the funded HPC 'Beat Team' relates to a recent operation conducted by Avon and Somerset Police to address reports of careless and dangerous driving on the C128 (main route to HPC main development site).

D.1.2 As a result of complaints received by Avon and Somerset Police via different channels (social media/local officers/phone calls) from the local community in and around Cannington, the issue of careless and dangerous driving was identified as a sustained and significant policing issue that required a targeted approach. Due to the volume of complaints received by Avon and Somerset Police, this resulted in the deployment of data capture boxes to support the anecdotal evidence. The complaints and data, having been reviewed by staff who are responsible for generating specific intelligence led taskings, corroborated the issue was of a substantial nature that warranted resource allocation for a targeted approach from policing resources.

D.1.3 Due to the nature of the issue that needed to be addressed, and so specialist training required from officers, the tasking generated was for Roads Policing Units (RPU). Through the RPU targeted action on the C128, two days focused on specific time periods within these days, the following were issued:

- 10 x excess speed fixed penalty notices (highest being 90mph in a 40)
- 5 x double white line overtakes
- 1 x revoked licence
- 12 x notice of intended prosecution (unable to safely stop vehicle, but registration captured)

D.1.4 Whilst the above figures are from the two specific periods targeted by the RPU, it needs to be remembered that in order for this issue to have been tasked targeted in the manner that it was, there had to have been significant activity prior to have warranted the targeting by the RPU team.

D.1.5 The link between this operation and the HPC workforce (as the main perpetrators of the activity targeted on the C128) is evidenced by a strongly worded communication (Figure D.1) released by the Applicant shortly after the RPU operation.

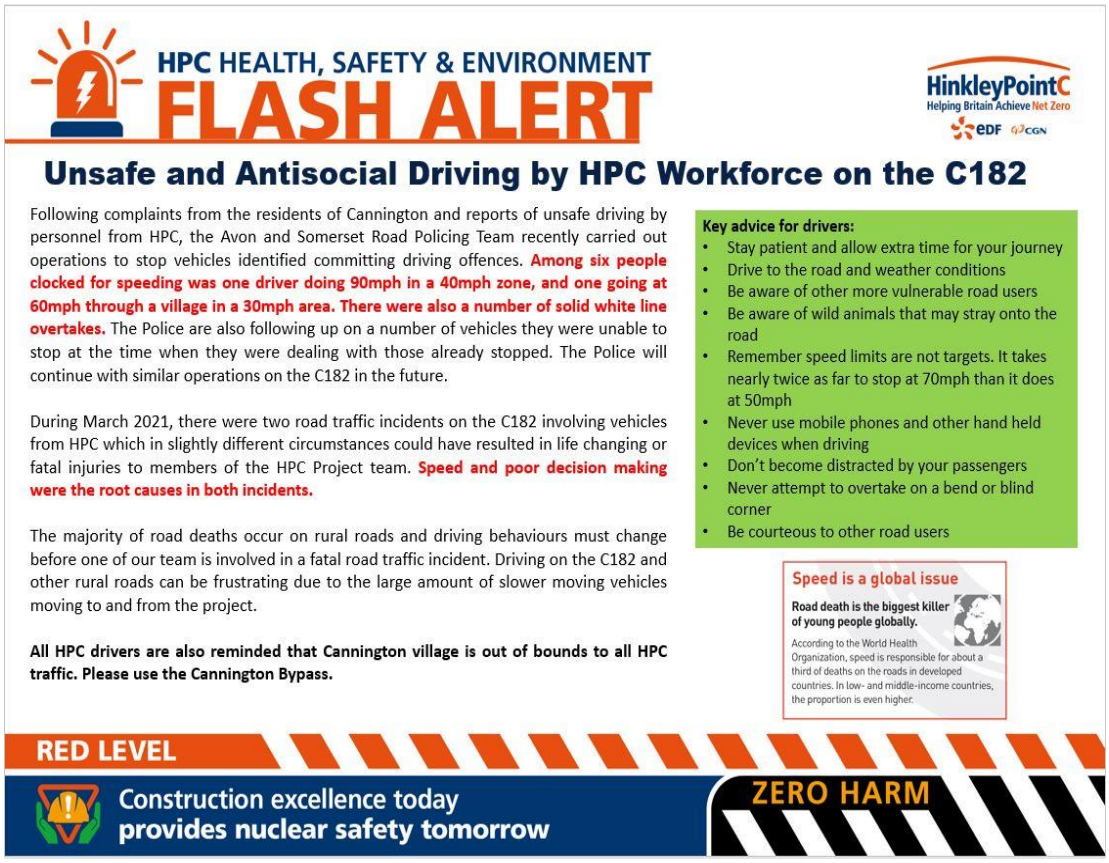



Figure D.1: HPC Communication regarding unsafe driving

D.1.6 The communication warns staff of the consequences if caught, and how the worker code of conduct could be applied, therefore the chances of a person being stopped willingly giving their employment as HPC (knowing the potential implications of doing so, due to the HPC Worker Code of Conduct) is highly unlikely.

D.1.7 Beyond acknowledging that the HPC workforce are key contributors to this issue, the text also identifies two traffic incidents on the C128 involving vehicles from HPC which in slightly different circumstances could have resulted in life changing or fatal injuries.

D.1.8 This example illustrates the Constabulary's position regarding the need for adequate and appropriate police resourcing mitigation, going beyond an on-site Beat Team, and highlights the weaknesses of relying on tagging calls to groups or areas to capture the totality of policing demands arising from HPC.

# Appendix E Literature Review: Factors not Quantified in Crime Modelling

## E.1 Employment Status

E.1.1 Deductive logic may suggest that when unemployment goes up crime is also likely to increase. The idea that unemployment drives crime is a popular one and has its roots in Durkheim's Anomie theory (that poverty leads to disenfranchisement which in turn leads to people rebelling against the law) and Becker's rational choice theory that people commit crime where it is in their benefit to do so. However, modern criminology believes both theories are too simplistic to account for the complexities of real life

E.1.2 Meta-analysis of academic research shows there is currently no consensus in the academic community (both criminological and economics) as to the relationship between crime and unemployment, with considerable debate around causation, correlation, the role of contributing factors and methodological issues with trying to establish the relationship in the first place.[28] For example, Entorf and Sieger's (2014) research in Germany found that while there is some evidence of a correlation between unemployment and certain crime types it is not consistent and is strongly affected by the underlying local crime rate.

E.1.3 Other research has found similarly mixed results. Ha (2019) used regression analysis of crime and unemployment data between 2005 and 2015 of 23 counties in the UK to look at the relationship between crime and unemployment during the financial crisis. She concluded that "*It is difficult to draw strong conclusions regarding the effect of unemployment on crime as there are many issues with data inconsistency, the lack of data available and omitted factors affecting the level of crime rates*" and that what her data showed is that "*unemployment negatively impacts crime rates i.e. an increase in unemployment causes property crime rates to fall or vice versa, thus showing a negative correlation*"[29].

E.1.4 Similarly, Eli Lehrer's (2000)[30] study into crime and the economy showed the historic exceptions that disprove the common assumption that crime and unemployment are linked. Lehrer concluded that removing unemployment from the equation, long term demographic change is the likely reason for a general decline in crime at a national level. Other research has shown most conclusively that crime and age have a strong positive correlation and that men, in particular, tend to 'age' out of crime.

E.1.5 Similarly, a clear link between unemployment and crime would imply a positive corelation between economic downturns and crime rates – yet here too the link

[28] Entorft, H. & Sieger, P. (2014) Does the Link between Unemployment and crime Depend on the Crime Level? A Quantile Regression Approach. Available at: http://ftp.iza.org/dp8334.pdf
[29] Ha, K. (2019) Analyse the Relationship between Unemployment and Crime. Available at: file:///C:/Users/victo/AppData/Local/Temp/Ha-eesj-a18.pdf
[30] Lehrer, E. (2000) Crime and the Economy: what connection? Available at: https://www.heritage.org/crime-and-justice/commentary/crime-and-economy-what-connection

is complex and unclear. While some studies show a positive correlation between recession and increased crime rates[31], others show the opposite. Finklea (2011), for example, found that while there was increase in crime during some recessions there was no consistent relationship between US economic recessions and crime rates as during others they remained relatively stable or even decreased. Similar inconsistencies were reported by Dr Bandyopadhyay[32] and Dr Rosefield (2014).[33]

E.1.6 Meta data analysis shows that there are many factors that affect the relationship between crime and recession, including where and when the recession took place, crime types used in the correlation, the nature of the recession and changes in the way that society lives. This is supported by the findings of the UNODC comparative study[34] which found that in 8 of the 15 countries studied there was a correlation between the economic crisis of 2008/9 and changes in the rate of some crime types. Violent property crime such as robbery were most affected with up to two-fold increases during the recession. Rises in homicides and motor vehicle theft were also observed. This is in line with the 'criminal motivation theory' that suggests economic stress may encourage illicit behaviour. In 7 of the 15 countries, however, no correlation was found.

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

## E.2 Fear of Crime

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

[31] United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)
[32] Bandyopadhyay, S (2018) The Paradox of Falling Crime Rates during a Recession https://www.birmingham.ac.uk/research/perspective/falling-crime-rates-siddhartha-bandyopadhyay-2.aspx
[33] Rosefield, R (2014), Crime and the great Recession. Journal of Contemporary Criminal Justice, Vol. 30 (I) 4-6
[34] United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)
[35] Mikula, M (2020) Will the COVID-19-related economic recession cause a spike in crime?

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

E.2.2 A study by University College London conducted in 2017 found that when individuals that never suffer crime only interact with people from their own group, they feel secure. However, only a small amount of interactions between groups is enough to change their perceptions of security. For instance, when 5% of the interactions occur with people from another group, the model predicts that more than 50% of the individuals who never suffer crime will fear it. Interestingly, the study showed that a decrease in crime rates has almost no effect on the perception of security. The researchers concluded that the perception that a region is secure is very unstable. It takes only a small amount of crime to create a generalised fear in the population, and crime rates need to decrease considerably and over an extended period to improve the average perception that a region is secure[37].

E.2.3 This is supported by research conducted by Professor Innes (2005)[38]. Innes (2005) argues that some events in the life of a social collective exert considerable influence because of how their presence is interpreted as denoting the potential for other similar or more serious problems to occur in the future. This sense that certain incidents exert a disproportionate impact upon public beliefs and attitudes when compared with their 'objective' consequences, is pivotal in understanding how and why social groups respond in certain ways to dangerous people, places and events. These events are typically called 'signal events' or 'signal crimes'. A signal crime can be understood as "a conventional sign, which, by prearrangement, has been arbitrarily established for this purpose – the purpose of announcing that there is something about which to be alarmed" (Goffman, 1972 cited in Innes 2005). Warr's (1994) research shows that people are disproportionately fearful of crimes such as rape, robbery and burglary compared to the risk of them actually happening. Even moderate increases in the perceived risk of violent victimization have the potential to increase fear enormously[39].

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

[36] Prieto Curiel, R., Bishop, S.R. Fear of crime: the impact of different distributions of victimisation. *Palgrave Commun* **4,** 46 (2018). https://doi.org/10.1057/s41599-018-0094-8
[37] https://www.ucl.ac.uk/news/2017/jul/fear-crime-contagious-even-low-crime-communities
[38] Innes, M (2005), 'Why Disorder Matters? Antisocial Behaviour and Incivility as Signals of Risk'. SCARR Conference January 2005. Available at: https://www.kent.ac.uk/scarr/events/finalpapers/Innes.pdf
[39] Warr, M. (1994) Public Perceptions and Reactions to Violent Offending and Victimisation. In National Research Council *Understanding and Preventing Violence, Volume 4: Consequences and Control*. Washington, DC: The National Academies Press. https://doi.org/10.17226/4422.

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

# Appendix F Existing Demand for Police Services

## F.1 Local Policing

### Criminal Investigations

***Suffolk***

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

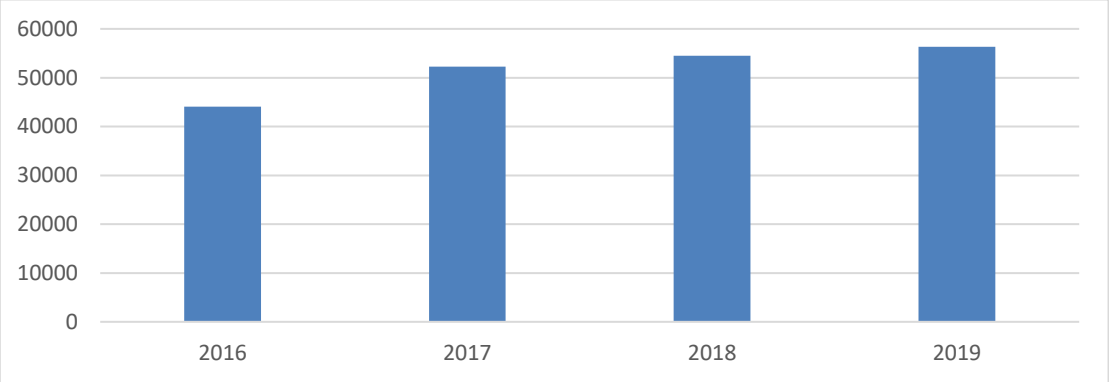



Figure F.1: Recorded Crime Investigations 2016 - 19

F.1.2 This increase is largely due to a rise in the number of public order offences, sexual offences and violent crimes recorded. Between 2017 and 2018 there was a 31% increase in Robbery, 20% rise in Possession of Weapons, 14% increase in Violence against the Person and 12% increase in Public Order and Sexual Offences. The apparent increase is consistent with the national trend identified by the ONS (2018) and is expected to continue growing[40].

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

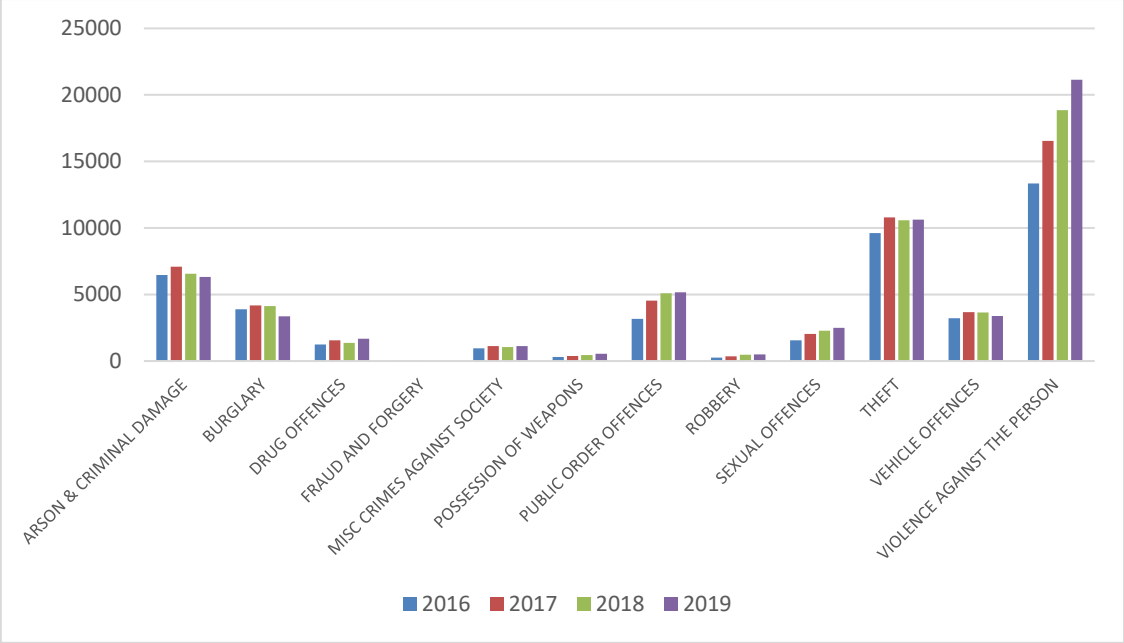



Figure F.2: Demand by Crime Type

F.1.3 Increases in recorded crime place more demand on limited resources. The crime type will also have a bearing on the likely period of the investigation; For example, sexual offences take longer to investigate and involve multiple departments (CID, SNT, SIU and SARC) whereas a theft from shop is less resource intensive and is usually resolved by the initial attending officer.

F.1.4 As Figure F.2 above shows, certain offence groups occur more frequently than others. Violence against the person accounted for a significant proportion (38%) of the total number of criminal investigations during 2019. Offences ranged from common assault to GBH. The suspect profile for VWI offences is predominantly male and between the ages of 18 – 55[41].

F.1.5 There is an important distinction between the frequency of offences and level of harm caused by certain offences. Sexual offences, for example, are far less frequent than theft or vehicular offences and yet the harm caused to both the victim and wider society is much greater. Any increase in high harm categories then, has a much greater impact both on society and the police in terms of long-term resource allocation.

F.1.6 As Figure F.3 below shows, the increase noted in Figure F.2 is part of a long-term trend and is consistent with the national picture[42]. Based on current projections, reported crime will continue to increase.

[41] https://www.croydon.gov.uk/sites/default/files/Strategic%20Assessment%202019.pdf
[42] ONS (2018) https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice

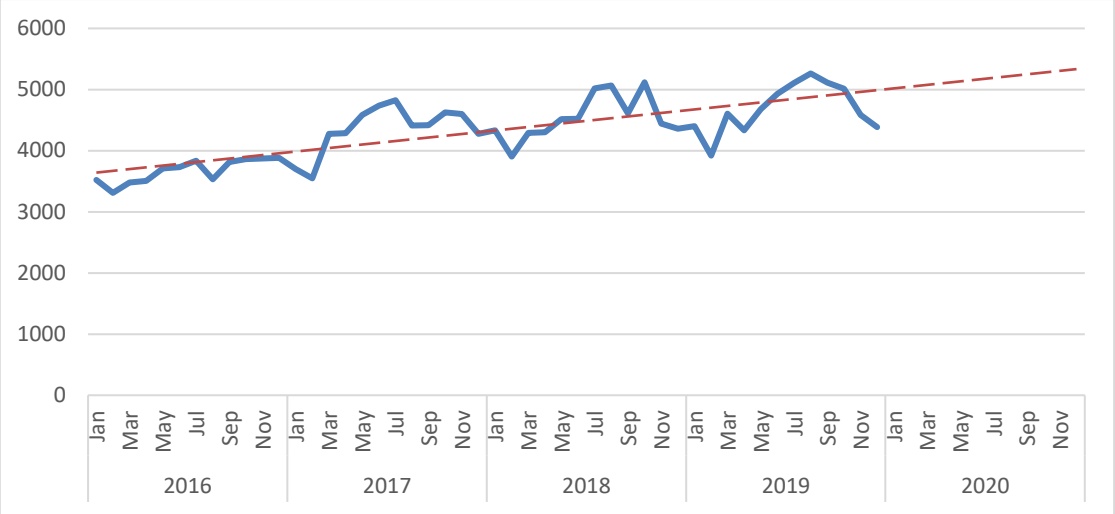



Figure F.3: Five Year Crime Trend

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

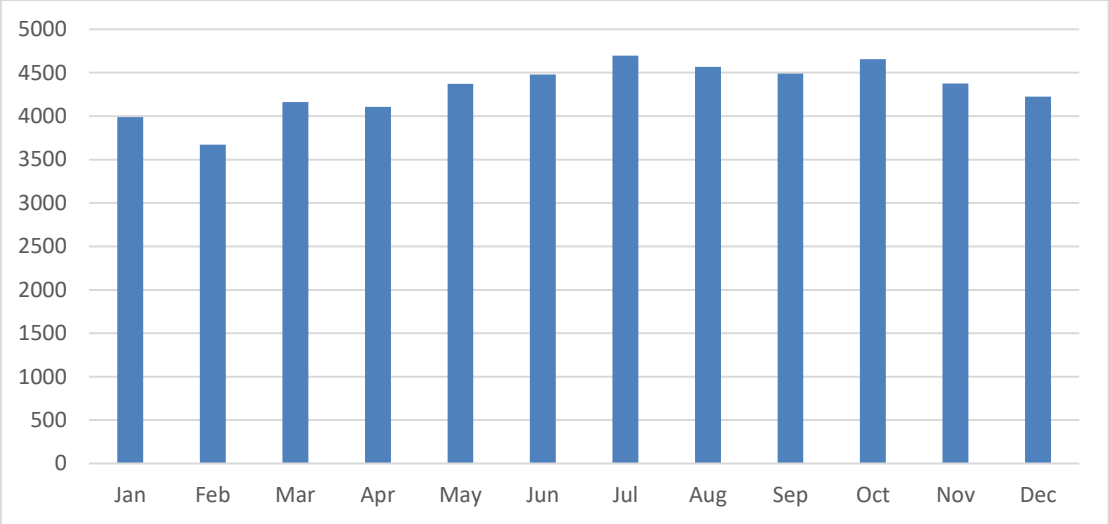



Figure F.4: Seasonal Variation Three Year Average (2016/19)

F.1.8 Demand on policing can come from a number of different areas: from reports of crime, to proactive operations and to education and prevention advice and activities, to name but a few. Police resourcing (i.e. staffing) is allocated based on the identification of demand trends.

F.1.9 Overall demand on police resources is relatively stable across the week although there is a noticeable difference in the type of demand. Peak demand for when crime is committed is over the weekend period (Friday – Sunday), which is consistent with the CCR data. The peak time for reporting crimes is mid-week (Tuesday/Wednesday) with a significant decrease in reporting over the weekend. This is due to the delay in when people report crimes to the police (Figure F.5).

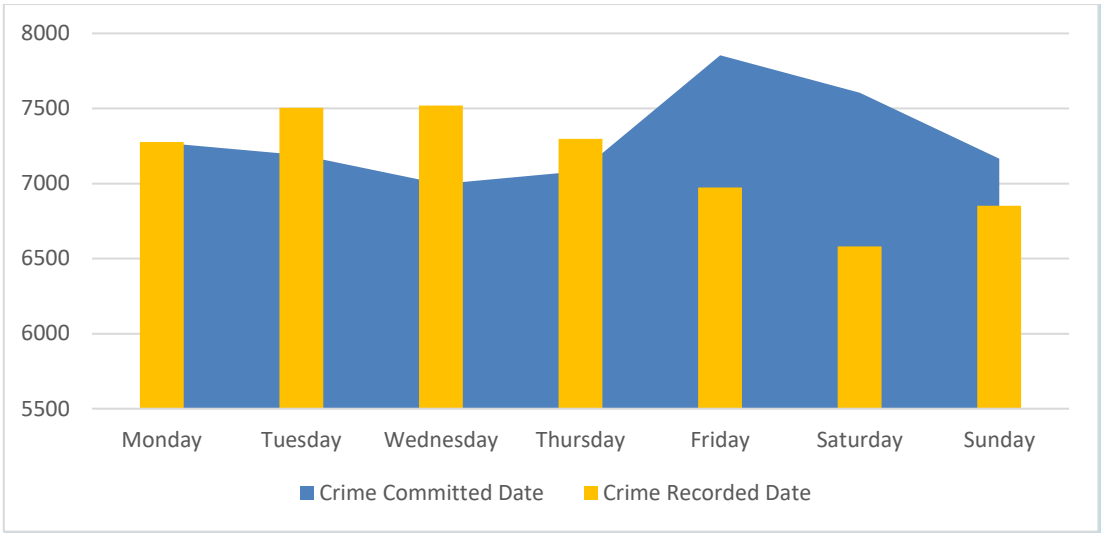



Figure F.5: Demand by Day Three Year Average (2016/18)

***East Police Area***

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

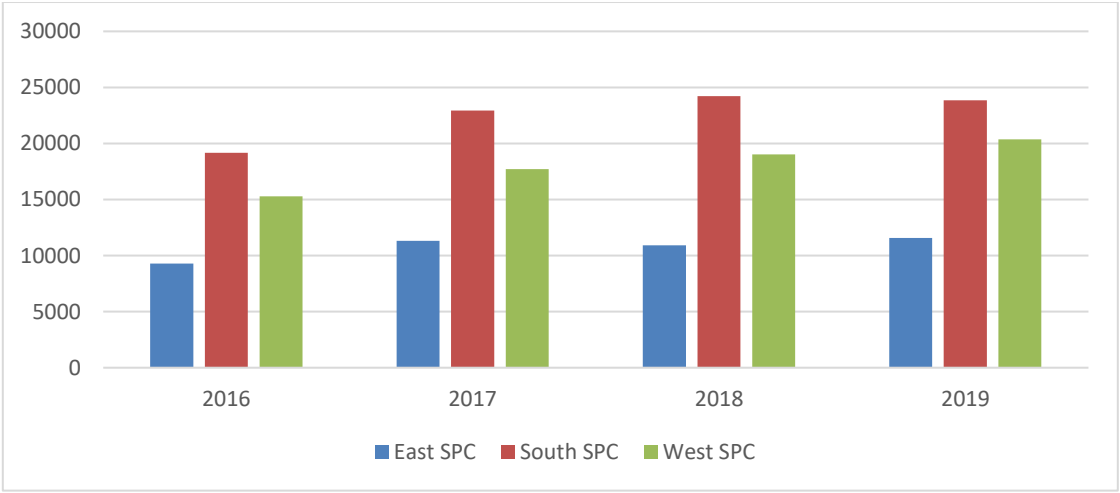



Figure F.6: Demand by Police District

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

in the West or South but the proportion of VWI offences is greater in comparison to the size of population and overall number of crimes reported[43].

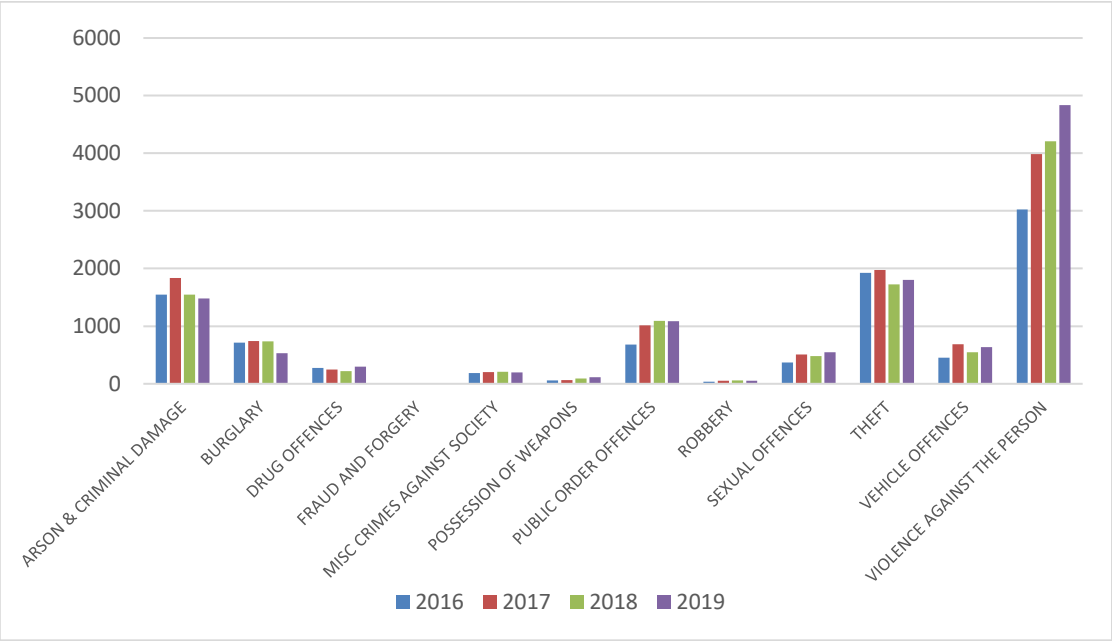



Figure F.7: East SPC Crime Investigation Breakdown

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

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

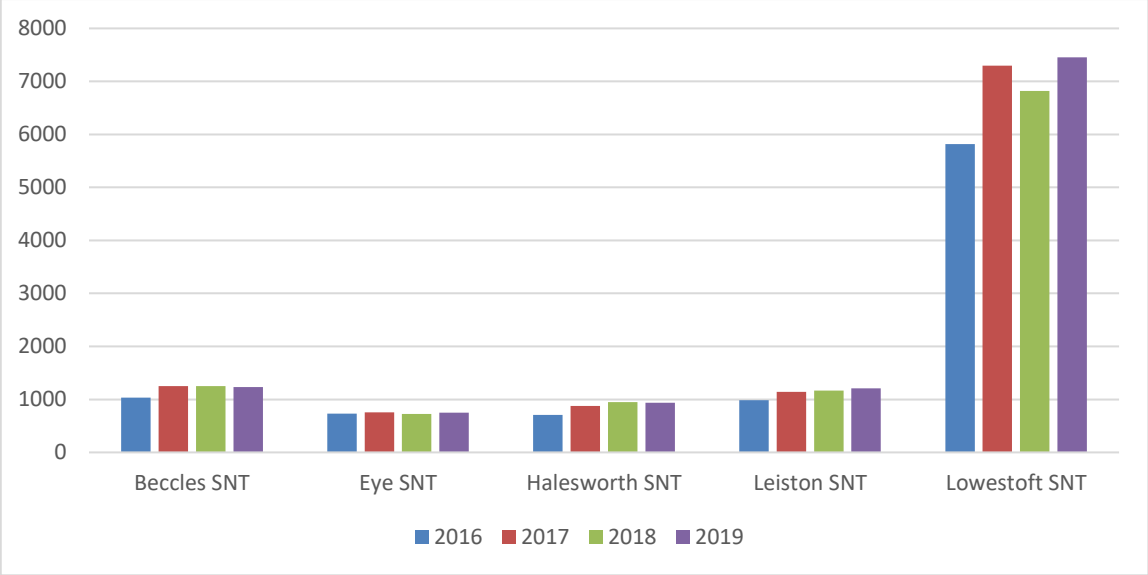



Figure F.8: Criminal Investigation by East SNT

## Non-Crime Investigations

***Suffolk***

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

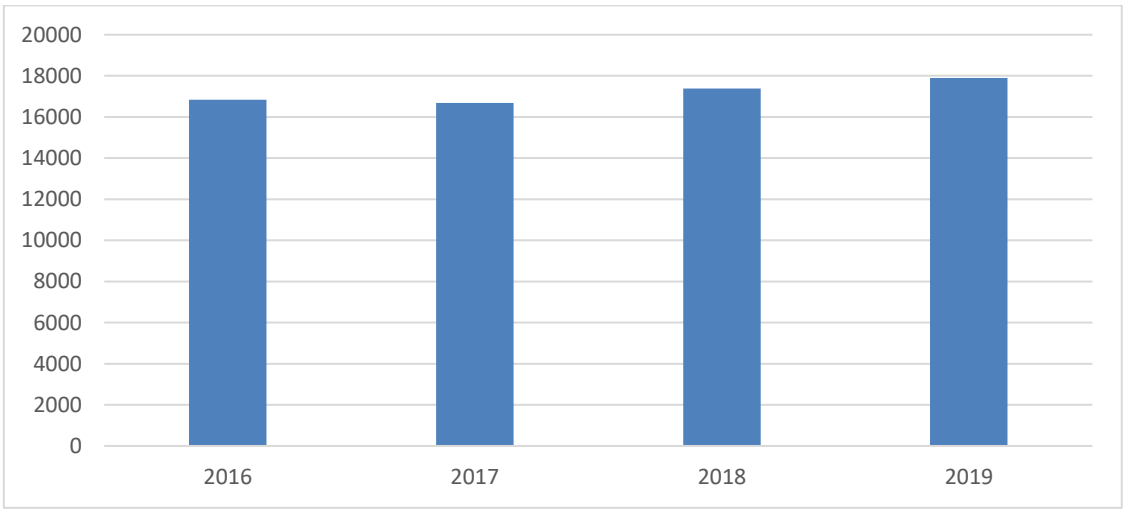



Figure F.9: Non-Crime Investigations Recorded in Suffolk

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

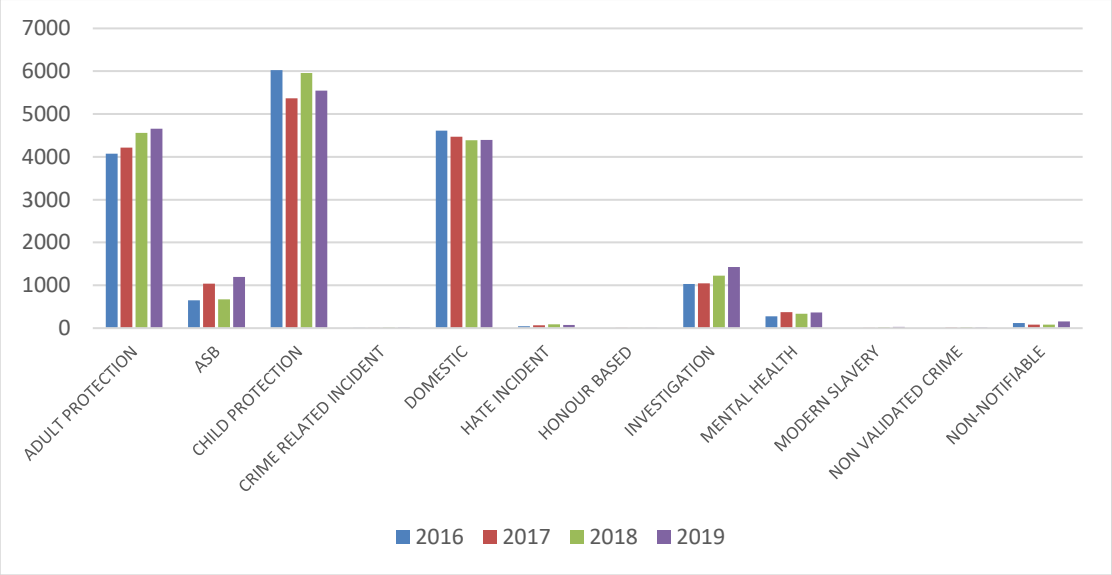



Figure F.10: Demand by Investigation Type

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

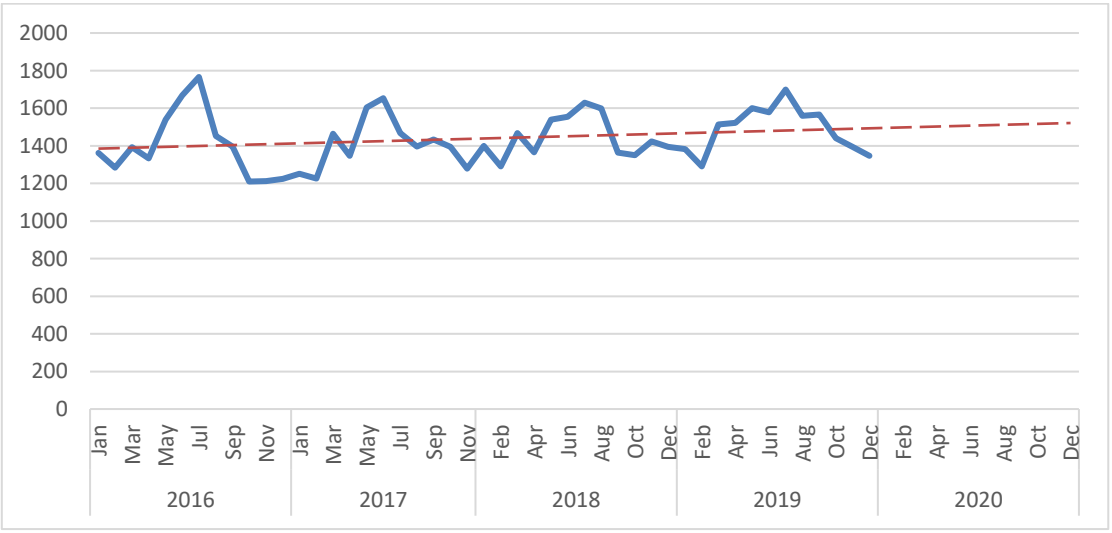



Figure F.11: 5 Year Non-Crime Trend

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

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

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

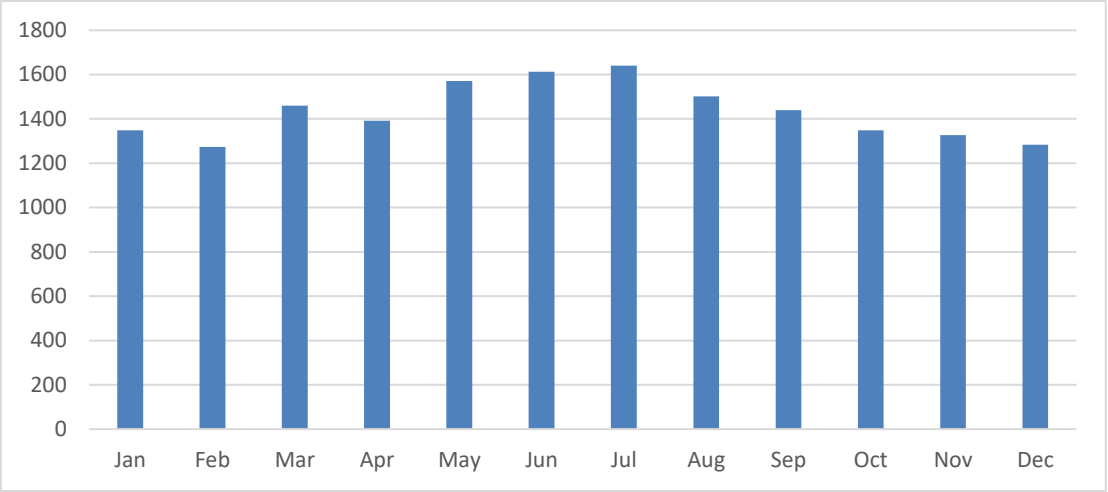



Figure F.12: Seasonal Variation (2016 - 2019)

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

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

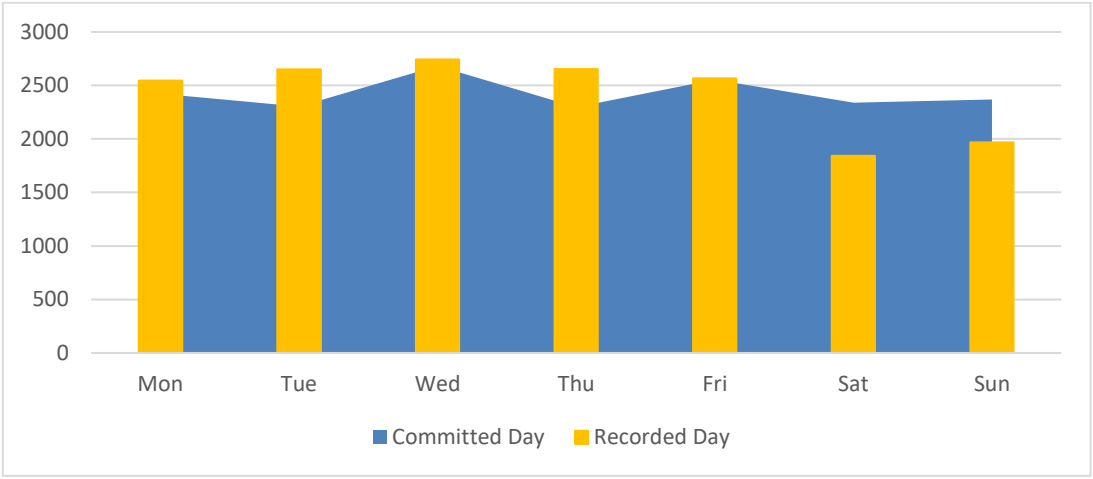



Figure F.13: Demand by Day Three Year Average (2016/18)

***East Police Area***

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

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

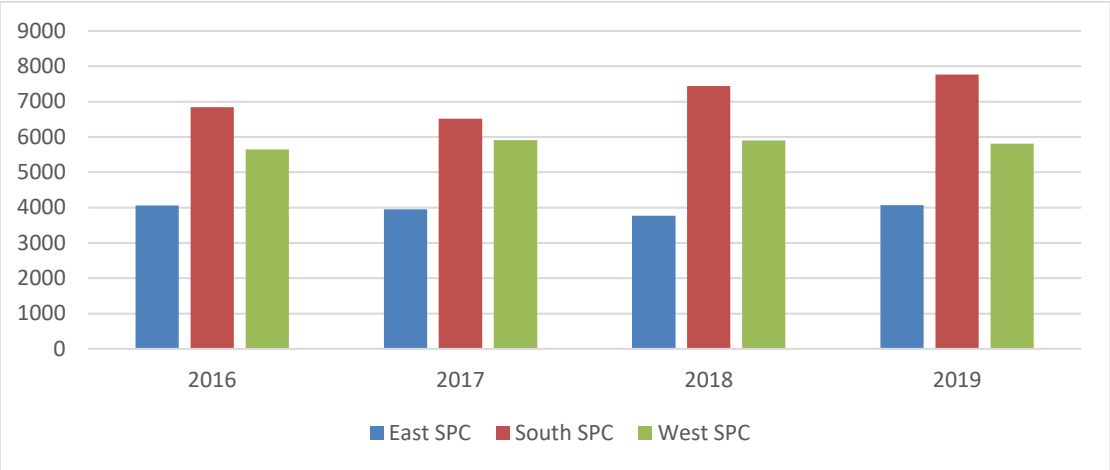



Figure F.14: Non-Crime Demand by Police District

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

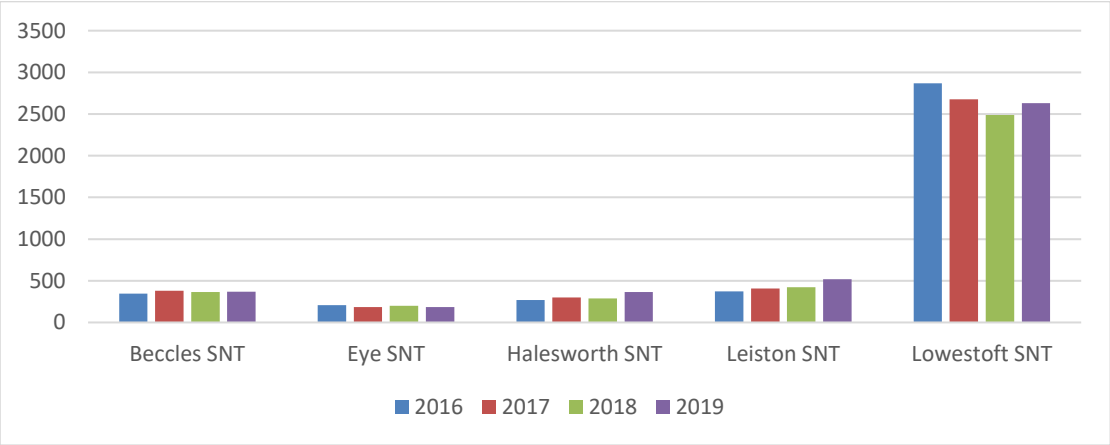



Figure F.15: Non-Crime Investigations by East SNT

## Additional Demands on Local Policing

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

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

### *Mental Health Calls*

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

F.1.27 A recent report by the College of Policing estimated that around 20% of police time in the UK involves a mental health concern and that this percentage is increasing year on year[44]. Research suggests it costs police approximately £522 to respond to a mental health incident with costs increasing if the individual is detained under S.136[45].

F.1.28 In addition to this an HM Inspectorate of Constabulary inspection in 2013 found that it was common for officers to spend up to 8 hours in incidents involving detentions under the Mental Health Act[46]. This represents a considerable proportion of that officer's shift time and can have further consequence on resourcing if it occurs towards the end of that officer's shift – resulting in either another officer diverting to take over care or over time being paid to the original officer to stay past the end of their shift. It should also be noted that it is the Constabulary's policy that individuals detained under S.135 or a S.136 are escorted by a minimum of two officers in order to safeguard the wellbeing of both the individual and the officers. More than two officers can be required if the individual is violent or judged to be high risk. This can have a serious impact

[44] College of Policing (2015) Estimating Demand on the Police Service
[45] Heslin, M; Callaghan, L; Barrett, B; Lea, S; Eick, S; Morgan, J; Bolt, M; Thornicroft, G; Healey, A; and Patel A. (2017) Costs of the police service and mental healthcare pathways experienced by individuals with enduring mental health needs. The British Journal of Psychiatry, Feb 210 (2): 157 - 164
[46] HMIC (2013) A Criminal Use of Police Cells? The use of police custody as a place of safety for people with mental health needs.

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

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

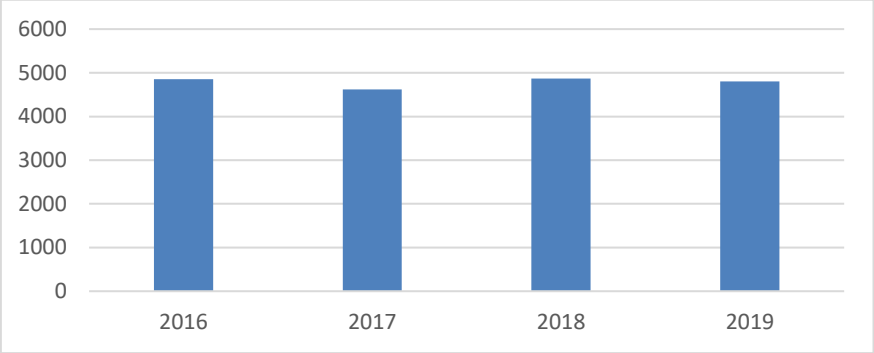



Figure F.16: Number of Mental Health CADs

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

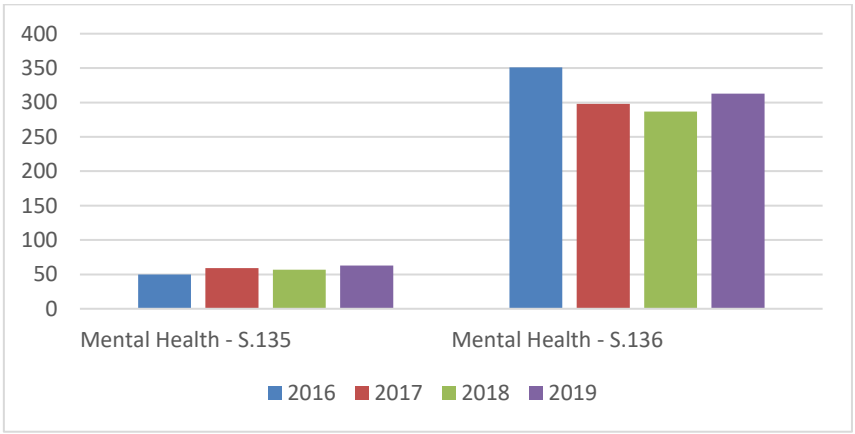



Figure F.17: Police Attended Mental Health Call

F.1.31 Studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average[47]. It is further recognised that the

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

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

***Suicides***

F.1.32 There were 67 verdicts of suicide recorded in Suffolk in 2018, up from 61 in 2017. The majority of these involved young males[48].

F.1.33 Analysis by the ONS found that 75% of suicides involved men and that males between 45 – 49 had the highest age specific suicide rate (27.1 deaths per 100,000)[49]. The report concluded that suicide is now the leading cause of death for men aged 15 – 49. Studies show that the majority of those who either take their own life, or attempt to, were in contact with a health professional within 12 months before their death[50]. As with mental health, NHB workers do not have their natural support network of friends and family and are therefore more susceptible to the pressures that can lead to suicide as the opportunity to talk and confide in others is not as readily available.

F.1.34 Other studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average[51]. The ONS also report that of the 13,232 in-work suicides recorded between 2011 and 2015 the construction industry accounted for 13.2% of suicides despite only accounting for 7% of employment in the UK[52].

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

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

[48] https://www.eadt.co.uk/news/survivors-of-suicide-in-suffolk-speak-1-6264772
[49] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations
[50] https://www.btp.police.uk/pdf/From%20Crisis%20to%20Care%20Website%20Final%20Aug%202016.pdf
[51] Burke, L (2019) Workplace Mental Health in the Construction Industry. http://constructorscompany.org.uk/wp-content/uploads/2019/05/Mental-Health-In-Construction-May-2019.pdf
[52] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations

F.1.37 A study by Knapp, McDaid and Parsonage (2011) estimated that the average cost of suicide was £1,450,000 per case in 2009; with the majority of the cost incurred around disruption to businesses from road and service closures[53]. Deaths occurring on or near major transport links (such as major roads and railways) can result in the closure of that road or train line for several hours resulting in considerable delays and volume pressure on less suitable roads, which can in turn result in more accidents. ONS data shows that suicide is currently increasing. In 2018 there were 6,507 verdicts of suicide recorded in England, equating to 11.2 deaths per 100,000 population and an increase of 11.8% from 2017[54].

***Missing Person Investigations***

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

F.1.39 In 2013 a study of UK police forces estimated that the average cost of a medium risk, medium length missing person investigation was around £2,415 for the investigating police force[55]. This amount is approximately three times the cost of investigating a robbery and four times more than burglaries[56].

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

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

[53] Knapp, M. McDaid, M. and Parsonage, M (eds) (2011) Mental Health Promotion and Mental Illness Prevention: The Economic Case. PSSRU. KSE and Political Science.
[54] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations
[55] Greene, K. and Pakes, F. (2013) The Cost of Missing Person Investigations: Implications for current Debates. Oxford University Press.
[56] UK Missing Persons Bureau
[57] Data obtained from COMPACT download

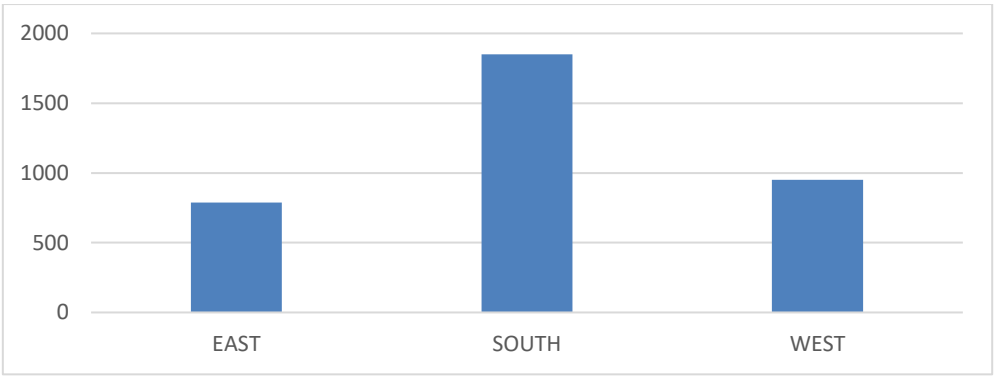



Figure F.18: No. of Missing Person Cases in 2019

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

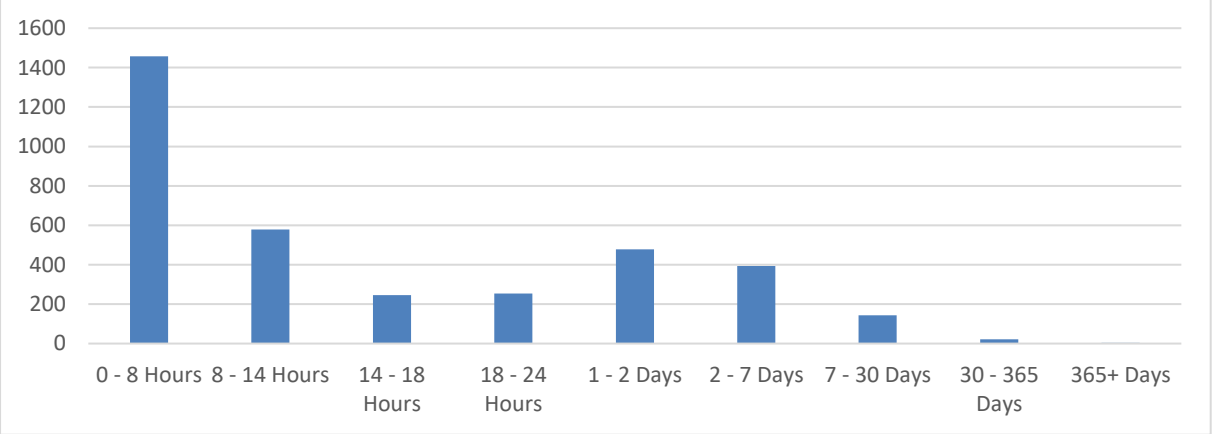



Figure F.19: Average Time Missing

F.1.43 In 2014/15 the Constabulary had the third highest number of high-risk missing person reports of all police forces in England[58]. The majority of investigations in 2019 involved medium or high-risk reports (Figure F.20) with 177 accounts of serious harm to the missing person recorded (Figure F.21). Where an offence had been committed either by or against the missing person this results in a separate criminal investigation that is independent of the missing person investigation. 26% (1021) of missing person reports relate to individuals between the age of 18 and 60 (Figure F.22)[59].

[58] UK Missing Person Bureau https://missingpersons.police.uk/en-gb/resources/research/geographies-of-missing
[59] For the purposes of the SC assessment, only cases involving missing people between 18 and 60 have been used in the predictive demand modelling.

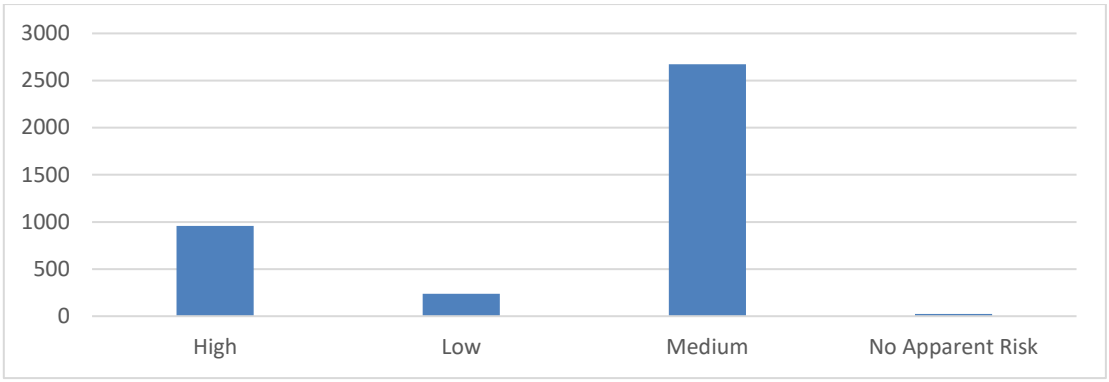



Figure F.20: Missing Person Cases by Risk (2019)

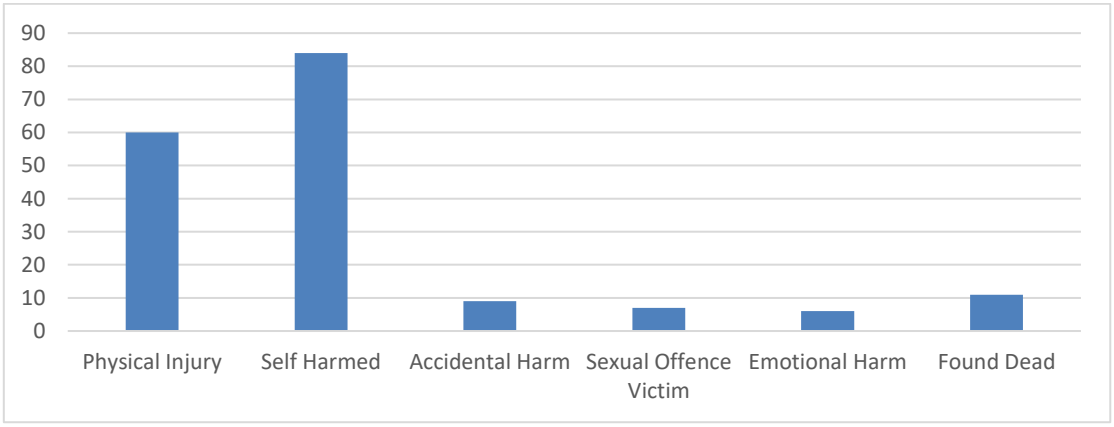



Figure F.21: Harm Reported to Missing Person

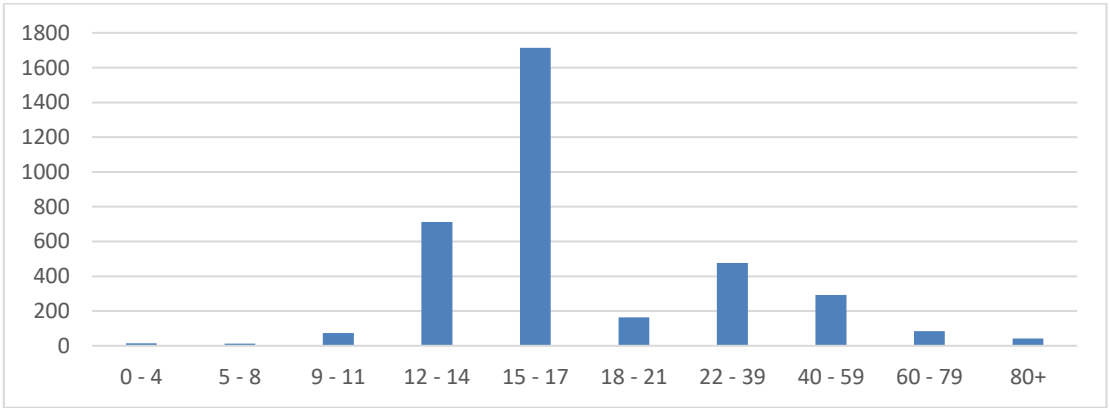



Figure F.22: MPI by Age Group

F.1.44 A recent review by the College of Policing (2015) estimated that 18 hours of police time is required per medium risk missing person investigation[60]. In 2019 there were 2,674 medium risk missing person investigations recorded in Suffolk. Based on the College of Policing calculations this would equate to 51,264 police manhours being devoted to a medium risk missing person investigation and therefore unable to perform or response or other community policing duties[61].

[60] College of Policing (2015) Estimating Demand on the Police Service
[61] This number excludes all subsequent investigations that might result from a missing person investigation (i.e. where a crime has been committed).

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

***Community Tensions***

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

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

## F.2 Custody

### Overview

9.2.19 In 2019 there were 10,758 detentions in Suffolk[62]. This represents an increase of 9% between 2016 - 2019 (see Figure F.23).

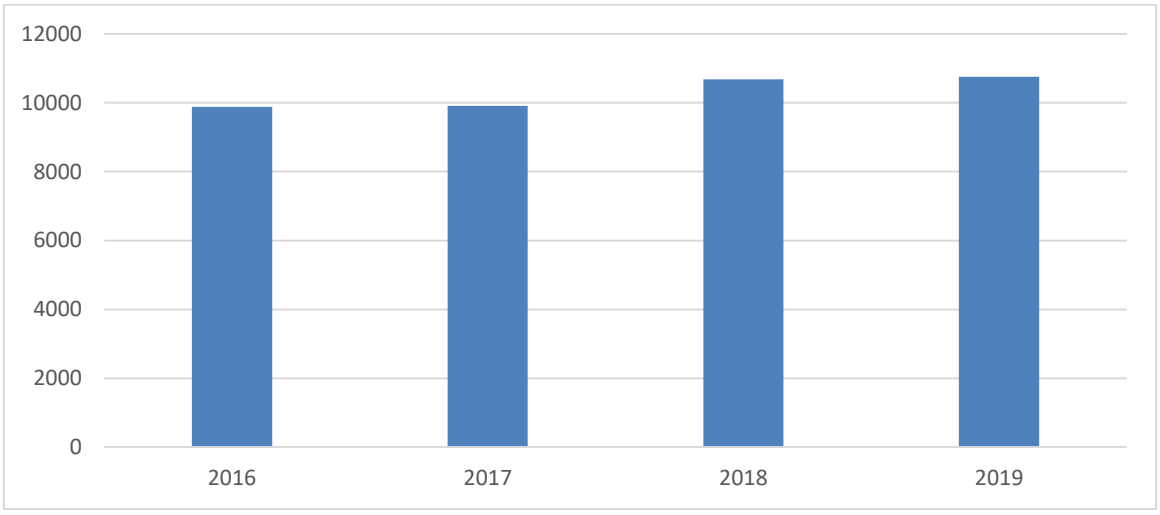



Figure F.23: Suffolk Constabulary Arrests by Year

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

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

identified national trends[63] and is likely to continue to rise over the next few years as the Linear Trend Line indicates (Figure F.24).

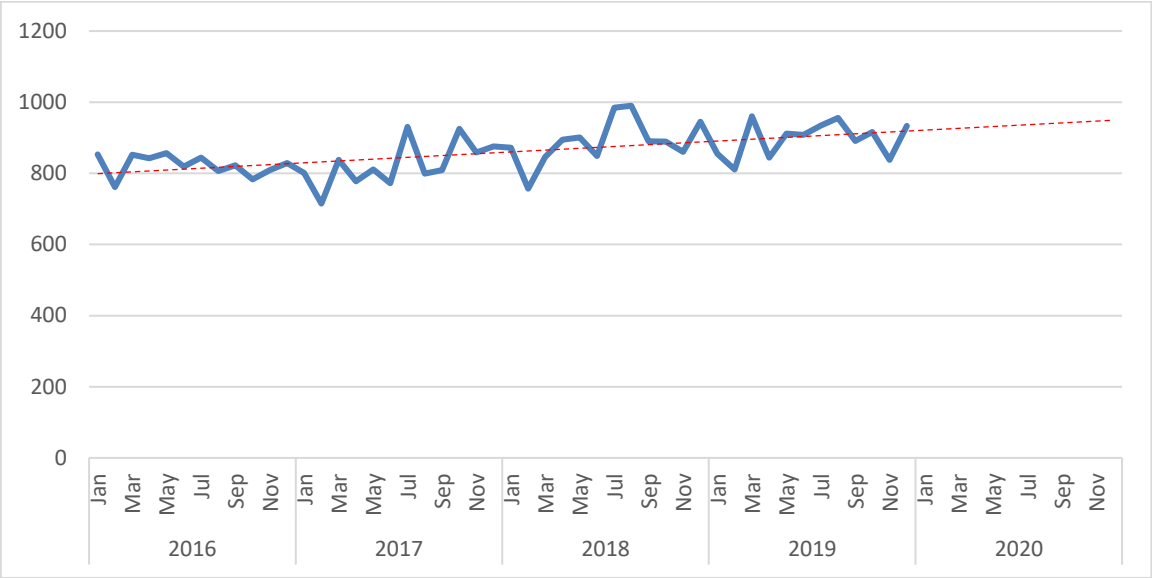



Figure F.24: Arrest Numbers by Month

F.2.2 A key factor driving the rise in detentions is an increase in Higher Levels of Arrestable Offences: ONS data from 2018 shows that while nationally crime numbers remain relatively stable, there has been a significant rise in the number of serious and resource intensive crimes being reported to police forces. ONS data for July 2017 – June 2018[64] shows a significant rise in Public Order Offences (+30%) and Robbery (+22%), with increases also recorded for Sexual Offences, Acquisitive Crimes and Violence involving a weapon.

F.2.3 The types of offenses articulated above are those that the core demographic of the SZC workforce, predominantly male between 20 and 49, are likely to be victims or perpetrators of[65]. An increase in these offences will lead to a corresponding increase in arrests, and due to the type and severity of the offences will require a corresponding increase in resource allocation to manage them.

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

[63] ONS (2018) https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice
[64] Crime in England and Wales: Year ending June 2018 available at: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingjune2018#latest-figures
[65] https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendingmarch2018

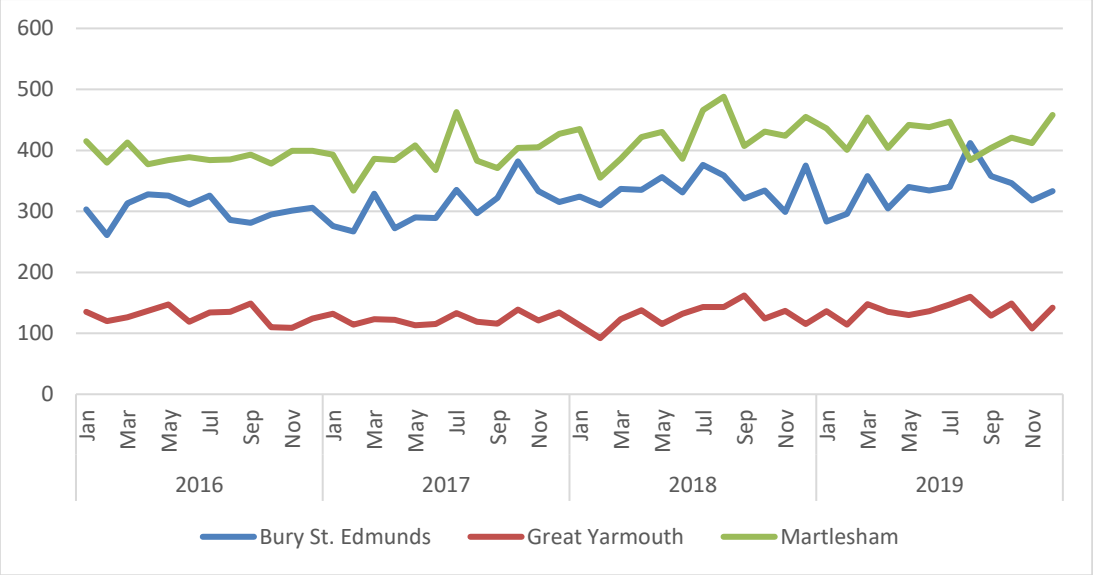



Figure F.25: Demand by PIC

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

### Disaggregation of Arrest Data

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

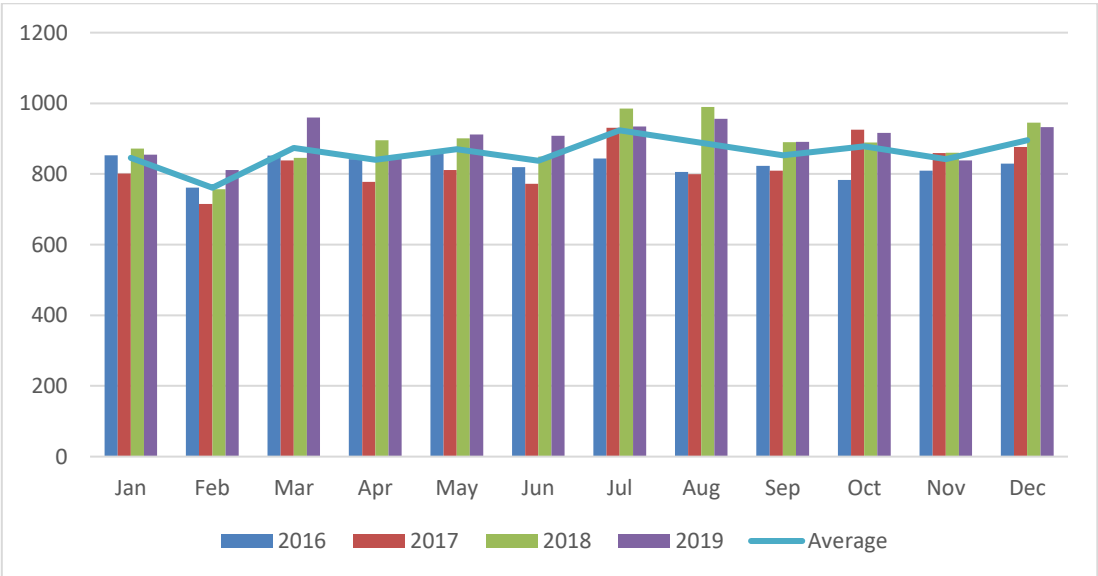



Figure F.26: Arrests by Month

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

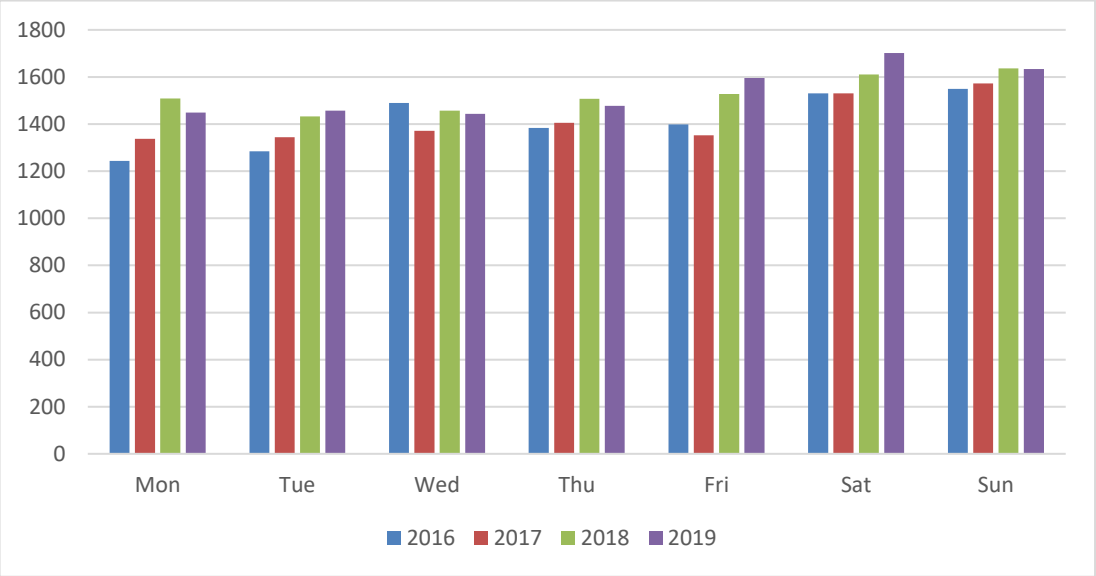



Figure F.27: Arrests by Day of the Week

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

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

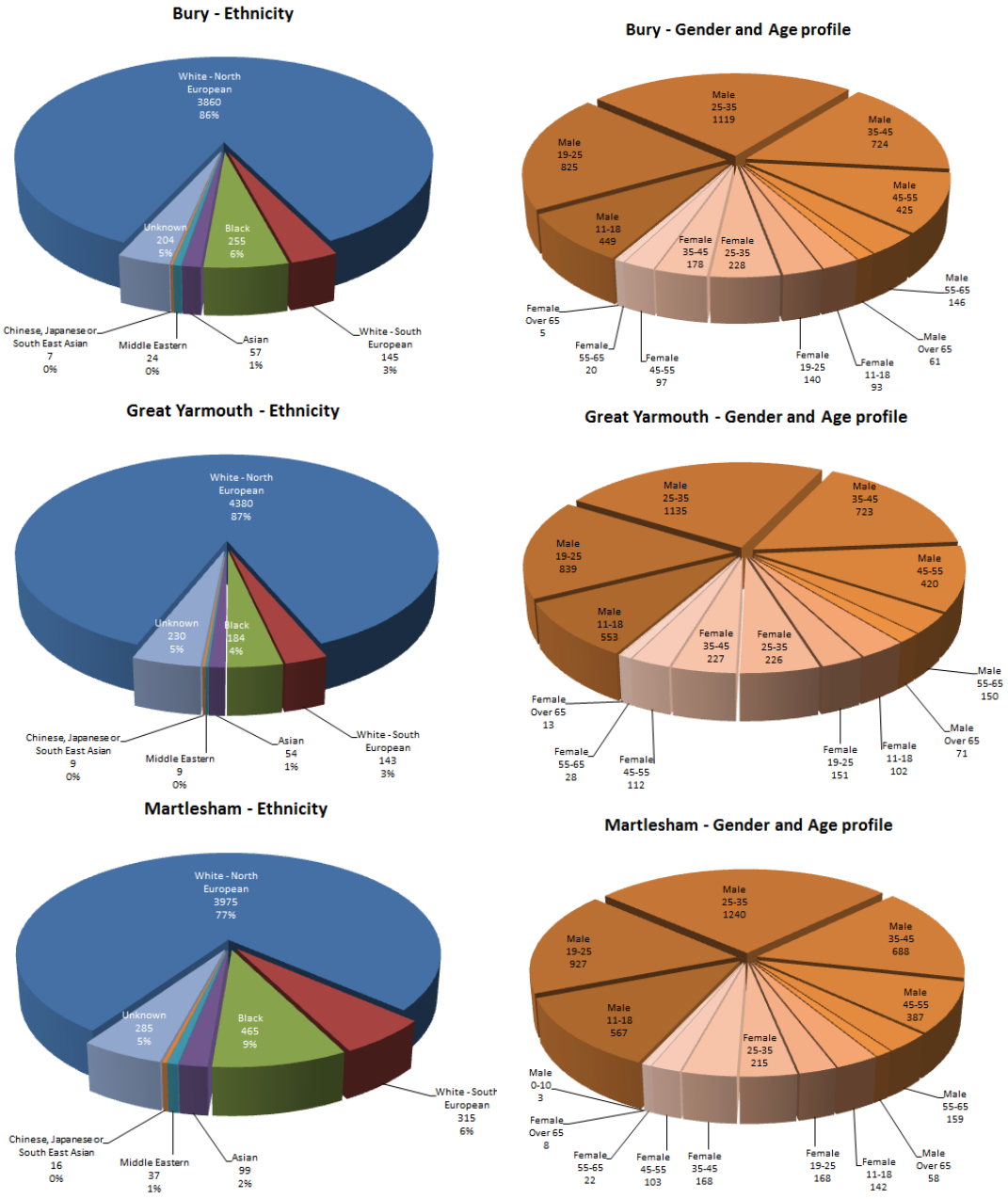



Figure F.28: Demographic breakdown

## F.3 CCR

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

### Emergency - 999 Calls

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

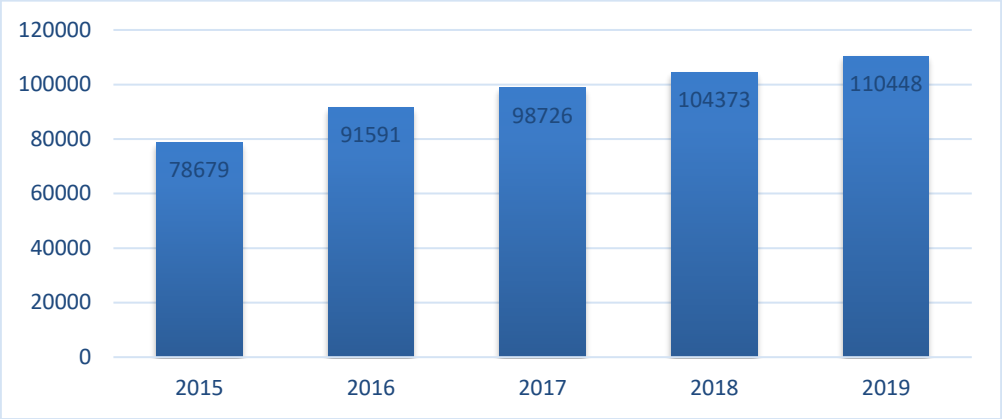



Figure F.29: 999 Calls 2015 - 2019

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

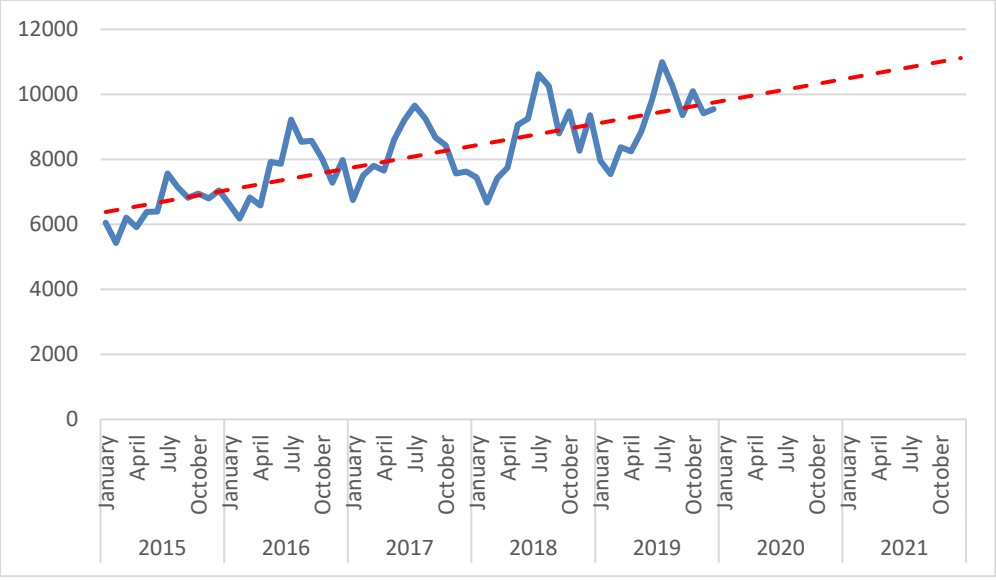



Figure F.30: 999 Call Trend

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

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

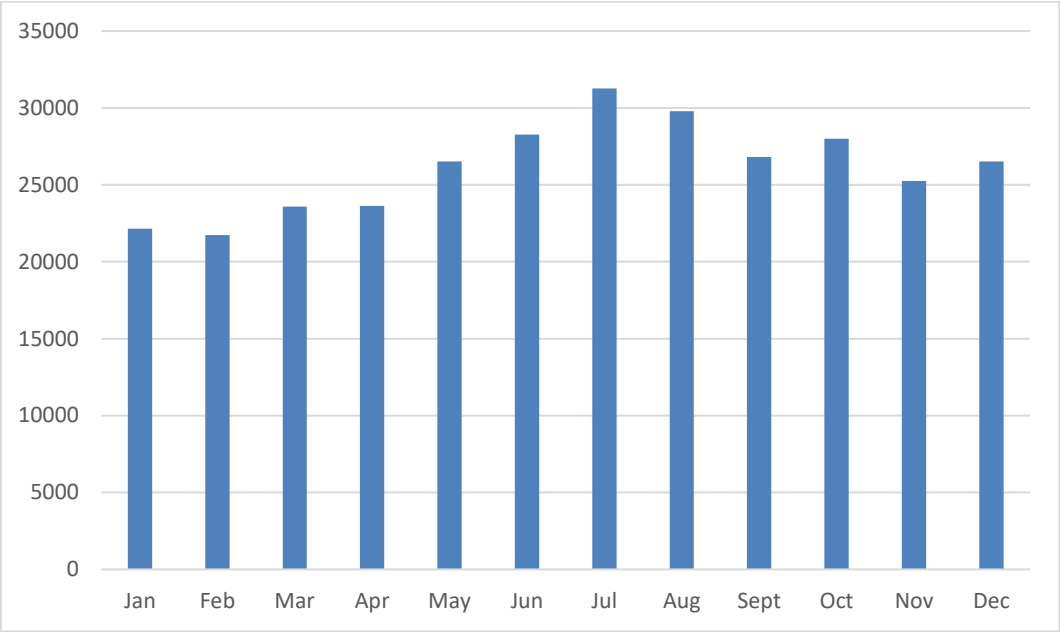



Figure F.31: 999 Seasonal Variation (Three Year Average 2017 - 2019)

F.3.5 999 call numbers are relatively steady throughout the week with slight increase in activity on Friday and Saturday (see Figure F.32). This is consistent with the pattern of demand in Custody[66].

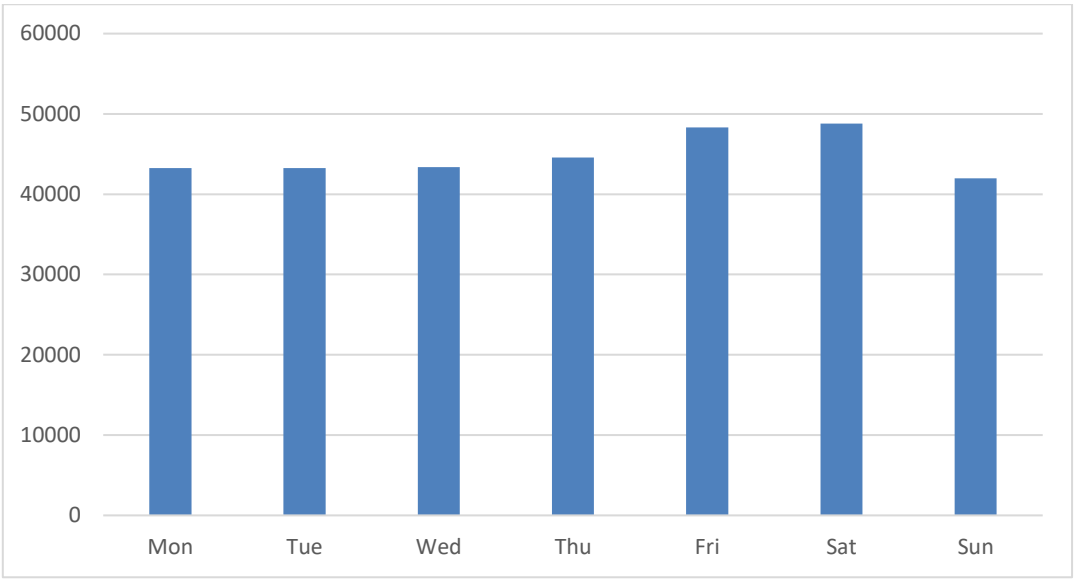



Figure F.32: 999 Calls by Day of the Week (Three Year Average 2017 - 2019)

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

### Non-Emergency - 101 Calls

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

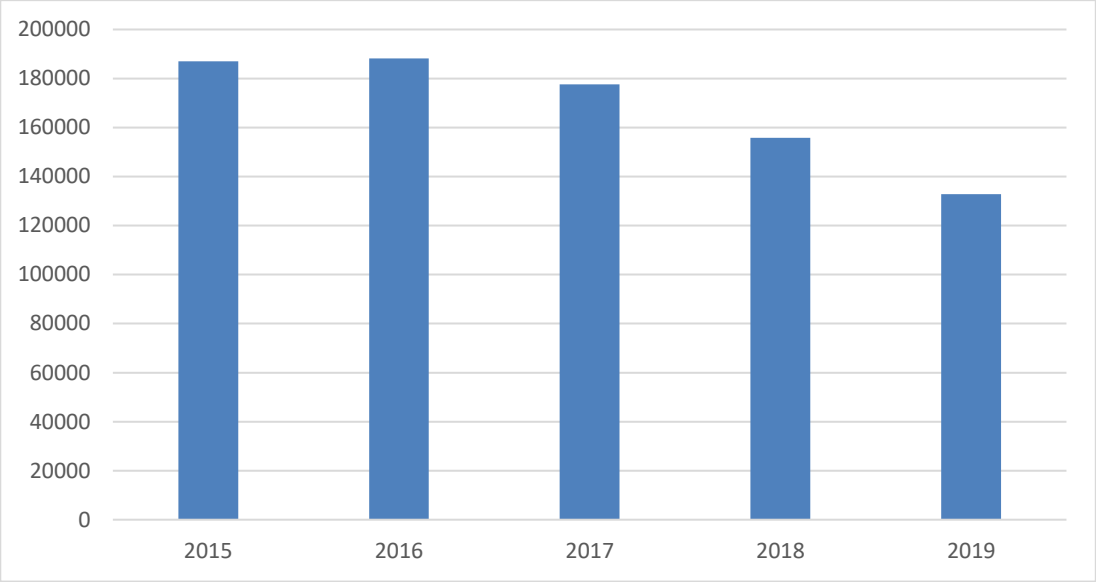



Figure F.33: 101 Calls 2015 - 2019

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

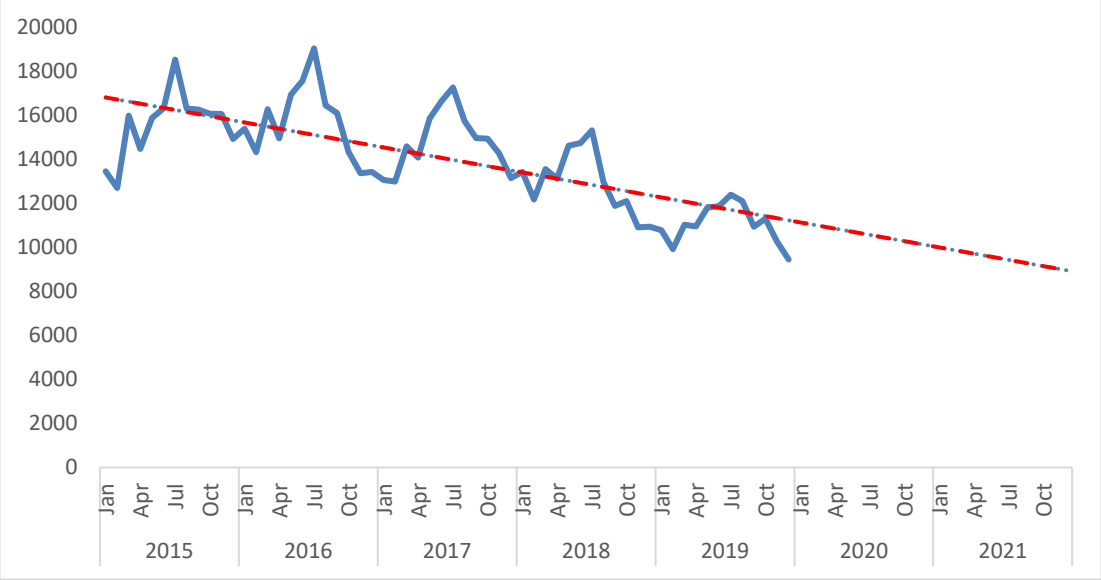



Figure F.34: 101 Call Trend

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

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

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

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

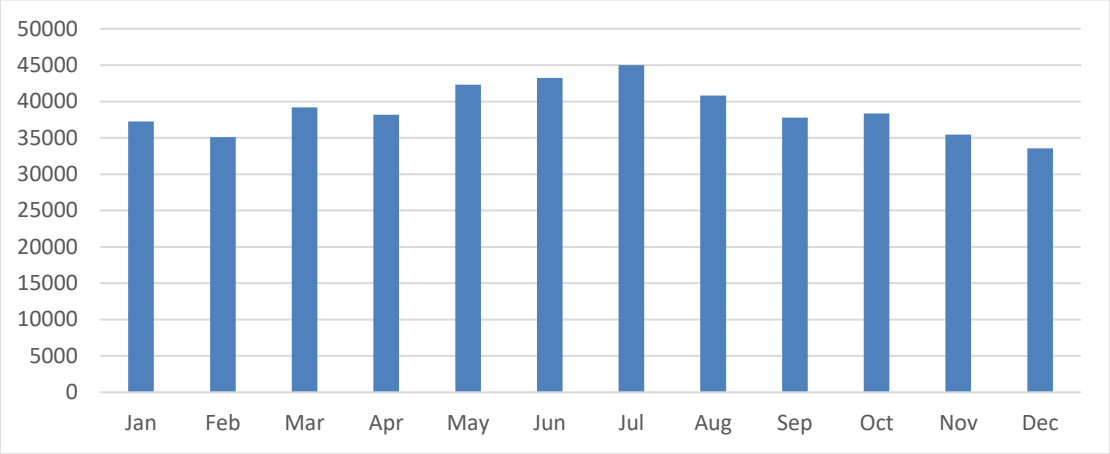



Figure F.35: 101 Seasonal Variation (3 Year Average 2017 - 19)

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

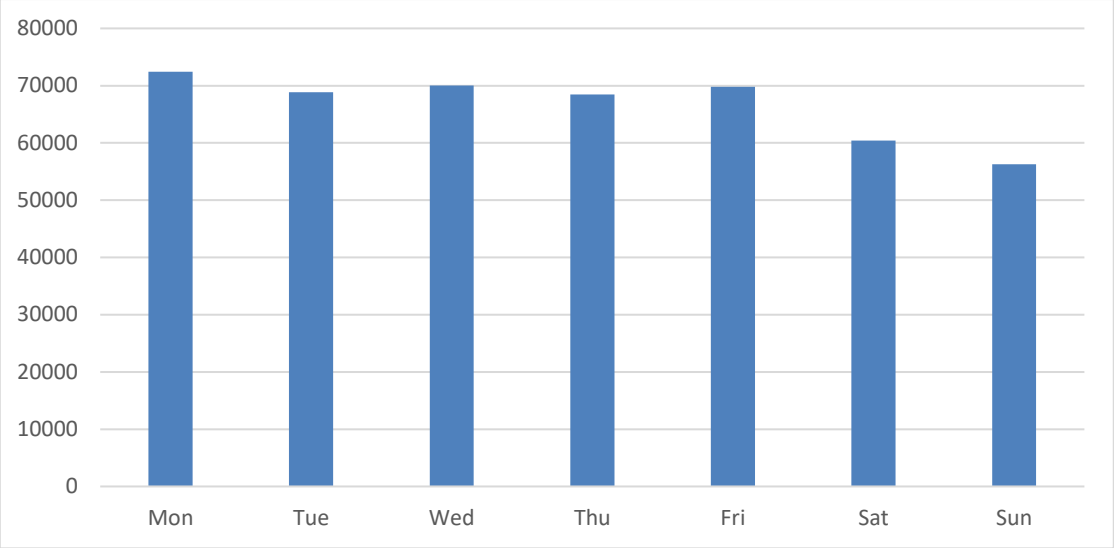



Figure F.36: 101 Demand by Day of the Week (3 Year Average 2017-19)

# Appendix G SZB AIL Movement Example

G.1.1 The Constabulary's has guided and assisted with the movement of many AILs along the A12 and B1122 corridors, including loads to the Sizewell B Power Station. That experience indisputably has shown the challenges that are to be faced by AILs accessing SZC. Information relating to one movement has been shared with the Applicant.

G.1.2 The load was classified as an STGO3 but although the dimension of the load was below the stated threshold for the Constabulary to require a Police escort, the decision to escort was taken jointly with the haulier (heavy lift and transportation specialist Mammoet) reflecting the weight, width, anticipated breaches of Traffic Regulations, and consequential moderately low speed of the AIL.

G.1.3 The AIL arrived on A14 under private escort where it joined the Police escort, which consisted of three uniformed offices on two marked motorcycles and a marked patrol car. The private escort vehicle continued with the AIL to Sizewell B.

G.1.4 The police escorted noted the alignment and corridor challenges that have been expressed previously within this note, namely:

- narrow sections of route where opposing vehicles could clash;
- tight turns and corners with limited forward visibility;
- traffic regulations which could be transgressed; and
- street furniture and vegetation which may be struck.

G.1.5 In negotiating these challenges, the Police escort was required to direct opposing traffic to hold at certain points along the route to allow the AIL vehicle to cross into the opposing lane or where the load was deemed to cause a risk to oncoming traffic.

G.1.6 Where appropriate the convoy was held in wider sections of the route or across junctions to allow following vehicles to pass the convoy, reducing congestion and delay.

G.1.7 Motorcycles were able to operate as a team with the patrol car and move between the rear and front of the convoy. As necessary they would move ahead to manage traffic to the side or to a stop; or clear and occupy junctions.

G.1.8 The patrol car would largely stay behind the AIL vehicle on sections of dual carriageway but would move ahead of the vehicle in single carriageway roads. In both cases, the car managed the oncoming traffic in accordance with the

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

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

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


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

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

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

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


G.1.12 The journey from A14 to Sizewell B took approximately 5.5hrs. Given the restrictions related to the hours and days AILs are permitted to operate, it is unlikely that more than two AIL convoys per shift could complete this journey.

G.1.13 Whilst not required during this movement, the Constabulary notes how Police escorting of AILs enables traffic to be managed when the convoy needs to be passed by other emergency services. This has dramatically reduced the impact on the response times on those occasions. Private escorts are not able to react to the situation and legally unable to direct traffic in those instances.

# Appendix H Areas covered by local policing operational areas

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

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

# Updated Written Representation Part 2 - Policing Impact Assessment (track changed)

# Sizewell C
## DCO Written Representation

## Part 2 – SZC Policing Impact Assessment

## Suffolk Constabulary

# Contents

## Appendices

# 1 Introduction

## 1.1 Introduction

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

1.1.2 The Constabulary's WR comprises three elements:

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

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

## 1.2 Purpose and Objectives

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

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

- Secure adequate and appropriate mitigation, including additional police resourcing, to avoid likely significant adverse community safety impacts and any other unacceptable community safety risks, including in relation to both local policing and roads policing. The cost of providing adequate additional police resourcing to help mitigate community safety impacts from the SZC project should not be borne by existing taxpayers in Suffolk[1].

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

## 1.3 Summary of Suffolk Constabulary Concerns

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

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

- Narrow scope of assessment - the singular focus of the small policing impact assessment on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than assessing wider community safety impacts likely to require police involvement.

- Limited consideration of demographic factors – the assessment of population dynamics undertaken in Chapter 9 – Socio-economics of the Environmental Statement ('ES') does not appear to have been factored into the assessment of resulting community safety impacts.

- Over reliance by the Applicant upon the perceived experience of the construction of Hinkley Point C ('HPC') project within the Avon and

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

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

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

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

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

## 1.4 Need for and Preparation of this PIA

### Need

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

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

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

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

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

### Preparation including Engagement with the Applicant

1.4.4 The Constabulary has engaged with the Applicant throughout all pre-application and pre-Examination stages of consultation and continues to do so, including through topic-based meetings and written requests for clarifications. The Constabulary has also participated in meetings of the Emergency Service Working Group and Community Forum convened by the Applicant and has maintained regular dialogue with other consultees concerned with the management of community safety impacts. These engagement activities have informed the Constabulary's assessment of likely community safety and policing impacts and the need for adequate mitigation to be secured, as set out in this PIA.

1.4.5 Previous drafts of the PIA which now forms part of the Constabulary's WR were shared with the Applicant for review and to facilitate discussions around the preparation of an initial SoCG (as submitted at Examination Deadline 2). All feedback received from the Applicant was carefully considered and informed several refinements to the Constabulary's PIA as described in Appendix A.

## 1.5 Requests of the DCO Examining Authority

1.5.1 At the time of submission there remains clear differences between the positions of the Constabulary and the Applicant as detailed in this WR. The ExA will therefore need to consider the acceptability of likely community safety and policing impacts and associated mitigation requirements, including additional police resourcing, as part of the Examination.

1.5.2 For the reasons set out in this WR, the ExA is respectfully asked to endorse the following positions held by the Constabulary and to ensure these are applied by the Applicant:

- Any assessment of likely policing impacts must be based on reliable data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project;

- It is therefore inappropriate to use policing impact data collated by the HPC Socio-economic Advisory Group ('SEAG') as the basis for assessing likely community safety and policing impacts from the SZC project in Suffolk;

- The development of community safety mitigation measures, including the quantum and structure of additional police resourcing, must be adequate, effective and appropriate for the policing context of the SZC project in Suffolk;

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

- It is therefore inappropriate to replicate the on-site 'Beat Team' approach to policing mitigation adopted at HPC for the SZC project in Suffolk; and,

- Instead, the quantum and structure of additional police resourcing identified by the Constabulary through this PIA as being necessary to help mitigate likely community safety impacts over the build period of the SZC project should be funded by the Applicant. Robust monitoring and adequate contingency funding also needs to be secured through the SZC Public Services Resilience Fund (Section 106 Agreement) to address additional potential community safety risks.

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

## 1.6 Written Representation Structure

1.6.1 The remainder of this WR is structured as follows:

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

- **Section 3 – Pertinent Differences between Suffolk and Avon & Somerset** highlights key operational differences between the force areas and policing models to illustrate that it is not appropriate to replicate the policing mitigation approach between the HPC and SZC projects as the Applicant has proposed.

- **Section 4 – Community Safety Impacts from the Sizewell C Project** identifies the community safety impacts that the Constabulary consider are likely to occur from SZC which will require policing involvement or management to avoid residual significant adverse effects or other unacceptable community safety risks.

- **Section 5 – Concern's Regarding the Applicant's Approach** outlines the Constabulary's main concerns with the approach adopted by the Applicant to date in the consideration of likely community safety and policing impacts from SZC. Further comments regarding the assessment, mitigation and acceptability of likely community safety impacts as predicted by the Applicant are provided in Part 3 of the WR.

- **Section 6 - Suffolk Constabulary Police Resourcing Assessment Methodology** details the approach adopted by the Constabulary to undertake an independent assessment of likely community safety and associated policing resourcing impacts from the SZC project.

- **Section 7 - Population Based Community Safety and Policing Impacts** outlines the Constabulary's current demand and resourcing structure in respect of three main impacted policing functions before setting out forecasted additional resourcing demands likely to be generated by the SZC construction workforce.

- **Section 8 - Construction Traffic Based Community Safety and Policing Impacts** outlines forecasted additional roads policing demands likely to be generated by the construction phase of the SZC project.

- **Section 9 – Mitigation and Monitoring** confirms the quantum, structure and phasing of additional resourcing identified through this PIA as being required to help mitigate likely community safety impacts from the SZC project.

# 2 Suffolk Constabulary Overview

## 2.1 Introduction

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

## 2.2 National Context

2.2.1 Policing across England and Wales is provided by 43 territorial autonomous police forces. For most forces, their geographical responsibility is synonymous with the county borders. For a small number there are two or more counties covered. The College of Policing and the National Police Chiefs Council ('NPCC') ensure standardisation of policing delivery across the UK but the way in which individual police forces are structured and resourced differs significantly dependant on demand, community needs and geography.

2.2.2 The Policing Protocol Order 2011 establishes the position of elected Police and Crime Commissioners ('PCC') and their respective Chief Constables in law. Chief Constables are charged with the impartial direction and control of all constables and staff within the police force that they lead. The Chief Constable holds office under the Crown but is appointed by the PCC for their force area. At all times the Chief Constable, their constables and staff remain operationally independent in the service of the communities that they serve.

## 2.3 Policing in Suffolk – Operational Model

### Overview

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

2.3.2 The Constabulary has an establishment of 1,219 FTE police officers and 40 Police Community Support Officers ('PCSO')[2] and over 872 police staff. In 2019[3], the force dealt with:

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

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

### Policing Structure

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

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

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

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

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

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

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

### Area Commands

2.3.7 The Constabulary operates as a single Basic Command Unit ('BCU'). The BCU is led by a Chief Superintendent. The county BCU is then divided into three 'Area Commands' each led by a Superintendent[4]. Within the three Command Areas, Neighbourhood Response Teams (NRTs) operate from nine bases across the County. The NRTs operate a five-shift pattern to provide an early, late, and night shift seven days a week. There are nine response teams operating across the county at any one time to ensure sufficient resources at the right locations to respond to any calls for service.

2.3.8 Each Command Area is also split into several SNT areas; there are 18 SNT areas across the County. Each NRT and SNT is made up of Police Constables and Police Sergeants. Police Inspectors have responsibility for a number of NRTs or SNTs. The SZC main development site lies within the Eastern Command Area, the Halesworth Local Policing Command ('LPC') and the Leiston SNT.

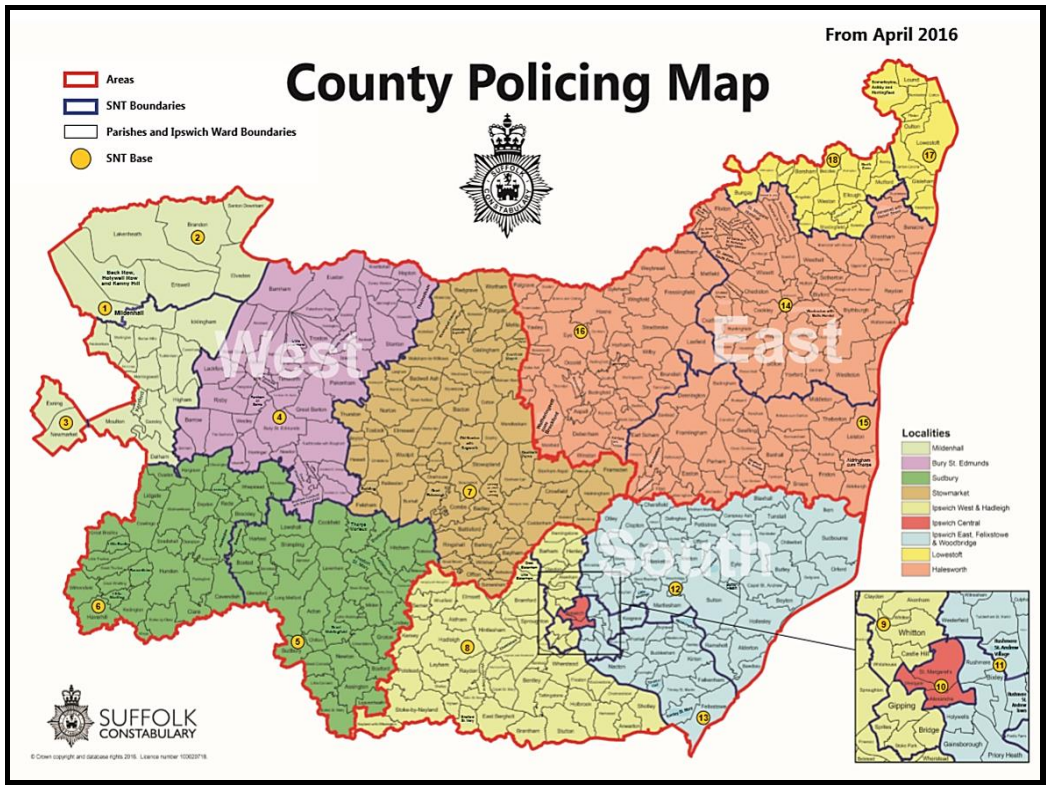



Figure 2.1: Suffolk Constabulary Operational Areas

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

### Crime, Safeguarding and Investigation Management

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

### Other Policing Functions

2.3.10 Other policing functions include:

- **Roads and Armed Policing:** teams operate from five operating bases across both Norfolk and Suffolk. Armed and roads policing for Leiston is based at Police Headquarters at Martlesham. Strategic Threat and Risk Assessments ('STRAs') are undertaken for both Armed and Roads policing functions and these dictate the level of cover provided over each part of the day.

- **Intelligence and specialist crime functions:** these functions are both area and centrally based. For Leiston this would either be Lowestoft Police Station or Police Headquarters in Martlesham.

- **Custody facilities:** located at three Police Investigation Centres (PICs) at Martlesham, Bury St Edmunds, and Gorleston in Norfolk. Persons arrested in the Leiston area may be taken to any of three PICs depending on capacity but in most cases this will be either Martlesham or Gorleston.

- **Forensic Services:** provided from either Lowestoft Police Station or from Landmark House on the A14 south of Ipswich.

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

### Policing in Halesworth and Leiston

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

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

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

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

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

## 2.4 Local Policing Deployment

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

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

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

## 2.5 Roads Policing

### Overview

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

### AIL Escort Role and Capability

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

Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled can impact the remaining operational number of RAPT officers available to be rostered for normal duties[5].

2.5.3 The movement of AILs including obtaining permission for the required route is a complex and time intensive operation. Hauliers are required to provide advance notice of the movements of an AIL in accordance with the Department for Transport regulations. For many loads this is set at a minimum of two clear days to the Constabulary and the affected Local Highway Authorities and bridge authorities. For Special Order movements[6], including mobile cranes over 80 tonnes GVW, two clear days' notice are required to the affected police and five clear days' notice to highway and bridge authorities. Longer notice could be necessary where temporary traffic management measures are required which are generally managed under Temporary Traffic Regulation Orders ('TTROs'). The management of AILs is always at the discretion of the Chief Constable for the affected local Constabulary.

[5] Police Regulations state that changes to shift patterns require 30 days' notice and that police officers should have at least 11 hours rest between shifts.
[6] Driver & Vehicle Standards Agency - Special types enforcement guide – Updated 27 September 2018

# 3 Pertinent Differences between Suffolk and Avon and Somerset

## 3.1 Overview

3.1.1 The Constabulary is concerned regarding the over reliance by the Applicant upon the perceived experience of the construction of the HPC project within the Avon and Somerset Police area to seek to predict community safety and policing impacts from the SZC project in Suffolk. Whilst the Constabulary acknowledge the importance of 'learning lessons' from HPC and have indeed spent considerable time engaging with the Avon and Somerset Police to understand potential impacts, this approach is not appropriate as baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different.

3.1.2 The section highlights key operational differences between the Constabulary and Avon and Somerset Police to illustrate that, irrespective of the predicted level of community safety impacts, it is not appropriate to replicate the same policing mitigation approach between the HPC and SZC projects as the Applicant has proposed. Details regarding the Constabulary's proposed approach to the delivery of adequate and appropriate mitigation are discussed in Section 9.

3.1.3 Evidence presented in this section demonstrates that the baseline demographic, socio-economic, community safety and policing contexts for HPC and SZC are very different, with Leiston and Hinkley also having significantly different baseline policing capacities. This reflects differences in the two forces operational policing models which have evolved to address differential needs of the local communities within their respective counties. In consequence it is not appropriate to replicate incident modelling or police resourcing mitigation solutions between the projects as the Applicant has proposed; a bespoke solution is instead required to address the net additional policing impacts of the SZC project within Suffolk.

## 3.2 Demographic and Socio-economic Differences

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

### Population Density

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

3.2.3 Suffolk is more rural than Avon and Somerset with a population of around 760,000 over 1,585sq miles. There are six main population centres in Suffolk: the county town Ipswich (pop. 137,000), Lowestoft (pop. 75,000) and Bury St Edmunds (pop. 41,000), Felixstowe (pop. 25,000), Stowmarket (pop. 20,000) and Newmarket (pop. 16,600).

3.2.4 The proposed location of SZC is in a low population density area of Suffolk. Leiston is the nearest town to SZC. In 2019 it was estimated that the population was 5,751. The nearest larger towns with access to amenities are Ipswich (25 miles) and Lowestoft (24 miles).

3.2.5 While HPC is located on the coast in a rural part of Somerset the nearest population centre with good access to amenities is Bridgewater (pop. 41,000+) which is 11 miles from the site.

### Age Groups

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

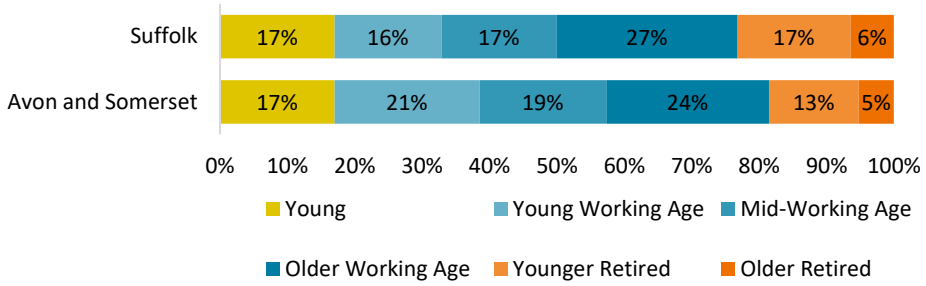



Figure 3.1: Age Structure Comparison with Avon and Somerset, 2018

3.2.7 Deprivation The nearest town to SZC is Leiston which sits within the East Suffolk District Authority. In 2019 Leiston and the surround area was ranked 15,788 out of 32,844 LSOAs in England: where 1 is the most deprive LSOA. This is amongst the 50% most deprived neighbourhoods in the country.

3.2.8 Using the Index Multiple Deprivation ('IMD') rank of average summary measure East Suffolk Authority District ranked 158 out of 317 local authorities and has some of the most deprived areas in Suffolk. Bridgewater is the nearest town to HPC. It is situated within the Sedgemoor Local Authority District. Using the IMD rank of average summary measure Sedgemoor Local Authority District ranked 121 out of 317 local authorities.

3.2.9 Compared to the 2015 IMD data deprivation has increased in both the East Suffolk and Sedgemoor District Authorities. However, the severity of IMD has increased more in Sedgemoor than in East Suffolk.

3.2.10 East Suffolk has some of the least deprived Lower-level Super Output Areas ('LSOA') in the country using the Crime MDI filter. The area around Leiston shows a generally low crime deprivation rate although Saxmundham is an

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

#### Summary

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

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

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

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

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

### 3.3 Operational Policing Differences

#### Resourcing Capacity

3.3.1 At force level, differences between Avon and Somerset Police and the Constabulary are evident in the Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services ('HMICFRS') categorisation of Most Similar Groups ('MSGs'), which places Avon and Somerset and Suffolk in significantly different groups. Importantly this relates to factors including geographical situation, resourcing, capacity, and workload, meaning the ability of Avon and Somerset Police and the Constabulary to help address community safety impacts from HPC and SZC, the need for associated mitigation and the most appropriate mechanism to deliver this mechanism are not directly comparable.

3.3.2 The HPC main development site is located within the Sedgemoor District policing area of Avon and Somerset Police. A comparison of existing local policing resources within the Constabulary's Halesworth LPC and Avon and Somerset Police's Sedgemoor District area is provided in Table 3.2 below.

Table 3.2: Local policing resource comparison

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

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

### Local Geography

3.3.4 HPC is located relatively close to Bridgwater, which serves as the home base for many county policing services. In contrast, the SZC main development site is remote from similar services in Suffolk.

3.3.5 The nearest Police Centre to the HPC main development site is located in Bridgwater, which is the largest police station in the Avon and Somerset Police area and acts as the home base for all Community Policing Units serving the Hinkley area. Bridgewater Police Centre houses several disciplines including uniformed, non-uniform and various specialist teams. This means all relevant policing units are available locally to manage issues arising from HPC (including the NHB workforce predominantly located in Bridgewater) and that additional Response Policing demands can be met from existing resources.

3.3.6 Local policing for the Halesworth LPC operates out of Halesworth Police Station, whilst specialist teams and non-uniformed officers operate out of Lowestoft (26.1 miles from Sizewell) or Police Headquarters at Martlesham (22.6 miles from Sizewell). Reflecting the rural and demographic characteristics

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

Table 3.3: Local policing accessibility comparison

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

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

### Transport Accessibility

3.3.8 Differences in the proximity of the HPC and SZC sites to the strategic road network means additional demand on roads can be more easily met through Avon and Somerset Polices Roads Policing Units. Access to the SZC main construction compound, having left the dual carriageway of the A12, is through single carriageway, country roads which are not regularly patrolled by such units

3.3.9 Avon and Somerset Police's Roads Policing Units are strategically based at Bridgwater to provide a roads policing capability along the M5 route connecting Taunton, Bridgwater, and Weston Super-Mare. In contrast, the East Suffolk Command Area does not have any strategic roads, the closest being the A14 at Nacton, some 25.2 miles from the SZC site.

3.3.10 Whilst the A12 is the main route that allows policing units to travel between Halesworth, Lowestoft and Martlesham, significant lengths are single carriageway and it is not a strategic (Trunk) route (as defined by Highways England) so the Constabulary's Roads Policing Firearms Operations Unit (RPFOU) do not routinely patrol the route. Any disruption to the A12 impacts heavily not only on local policing units but also those specialist teams required to travel to incidents from further afield. If the A12 is closed and traffic is diverted, Suffolk's rural road network is a very difficult route to navigate and significantly increases travel times. The Constabulary's policing model and its resourcing factors in travel times to emergency response calls. Changes to road metros that themselves change response times further supports the need for a more localised mitigation of additional demand.

### Urban and Rural Amenities

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

# 4 Community Safety Impacts from the Sizewell C Project

## 4.1 Overview of SZC Project

4.1.1 The main development site for SZC is located on the Suffolk coast, immediately to the north-east of Leiston and approximately halfway between Felixstowe and Lowestoft, within the administrative boundary of East Suffolk Council ('ESC').

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

## 4.2 Likely Community Safety Impacts

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

### Substantial Demographic Changes

4.2.2 From information provided in the SZC DCO application it is clear the construction of SZC will require a very large workforce, including a significant NHB component, over a prolonged period (12 year estimated construction programme). The Applicant contends that much of this workforce will be drawn from the workforce engaged in the construction of SZC in Somerset whilst simultaneously highlighting local economic and employment benefits for people in Suffolk.

4.2.3 To understand the community safety risks and impacts from the SZC construction workforce, it is first necessary to understand the baseline demographic position. In short, the existing population of Suffolk displays a predominantly rural character with a high rate of population ageing, resulting in a specific demographic profile (as opposed to simply a population size) that is associated with relatively low crime and wider community safety risks. Any substantial change to this demographic profile is therefore likely to increase the risk profile and generate adverse impacts. It also should be noted that Suffolk's demographic profile differs from other areas including that of Somerset,

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

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

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

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

- *Traffic volumes and effects on road capacity and specific events such as delivery of road-borne AILs which may have the potential to affect emergency service response times to the immediate locality and surrounding communities.*

- *Impacts on equality target groups and community cohesion, including on vulnerable groups.*

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

- *Potential risks to vulnerable young people and care leavers, particularly in Leiston, and particularly those who are in housing need or vulnerable to homelessness;*

- *Potential risks related to cultural differences between NHB construction workers and residents.*

- *Potential risks related to drugs, alcohol and prostitution including exploitation of young girls by a predominantly male workforce, and potential for related increase in trafficking and other hidden harm.*

- *Potential risk of increase in mental health issues from SZC workforce, and correlate in increased demand on Policing.*

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

### Substantial Traffic Changes

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

### HGV Traffic

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

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

### AIL Movements and Traffic Delays

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

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

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

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

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

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

4.2.14 SZC is likely to attract heighted protestor activity to Suffolk, due to the contentious nature of nuclear energy, as exhibited through other major infrastructure development projects. Where such protests fall within areas that are policed by the Constabulary, to ensure the most expedient response and so resolution to these protests, there is a need to ensure that those officers that addresses protestor removal are equipped and trained to deal safely with the eventualities that such protests can attract and the methods and means of addressing the tactics such protesting is known to use.

4.2.15 The current number of officers trained for protestor removal in Suffolk is based around catering for likely current demand within Suffolk, and they are trained to F5 Module 'Basic Protestor Removal' level as set by the College of Policing. The number of officers trained will need to be increased to address the likely increase in protest removal requirements from SZC activity. In addition to the current F5 Module training requirement there will be a need to train Suffolk officers to the College of Policing F7 Module that allows for the removal of protests held at height and the purchase of specialist equipment required for protester removal at height.

4.2.16 If the Constabulary's s ability to efficiently facilitate and manage protests connected with SZC is not adequately resourced there would be a need to call upon neighbouring forces, which is likely to result in significant delays in the lawful resolution of protests and increased disruption.

### Additional Community Safety Risks

4.2.17 Following discussions between the Constabulary and the Applicant, the SZC PIA has focused on quantifying demand arising from likely community safety impacts attributable to the projected SZC NHB workforce population (including families) on a per capita basis and owing to the need for significant AIL movements. However, additional resource implications also need to be considered in the context of wider community safety and policing impacts not directly attributable to individual construction workers or AIL movements. This is required as:

- The predicted increase in crime and wider community safety incidents requiring police involvement is not solely predicated on SZC workers being direct perpetrators or victims of crime. Rather, it is well established that areas of concentrated population including major constructions sites often become a 'honey pot' that attracts criminals to the area as a result of increased market demand and 'rich pickings'. A concentration of workers on a higher than average wage for the area, and the associated trappings these workers will bring i.e. disposable income for the night time economy and other recreational activities (both legal and illegal) will attract market suppliers.

- Predicted demand for local policing based on current known per-capita based levels of demand cannot quantitatively forecast other areas of crime and wider policing demand growth which are likely to arise from a

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

- Serious crime areas such prostitution, human trafficking and modern-day slavery, as well as an increase in night time economy offences, violence against the person, domestic violence and sexual offences. These offences are among the most intensive in terms of police resourcing and harm caused to victims.

- County Lines – criminal groups who deal drugs look to exploit new drugs markets to expand their business, for which the SZC NHB workforce would be a prime market. Areas of Leiston are deemed as deprived and already home to a proportionately higher number of drug users, so a disproportionate proportion of the S23 warrants executed within the Halesworth locality are in Leiston. To ensure drugs lines are not established, pro-active policing will need to take place to deter any wider criminal activity. The introduction of a very large transient workforce will be very attractive for organised criminals to target. If drug lines are established, other related crimes will occur including violence (including possibly weapons), public order, burglary, robbery, theft, child sexual exploitation and MDS.

- Responding to EDF Site Security – local policing units will be required when security become aware of suspicious activity around the site, such as individuals taking pictures or filming. In such situations the Constabulary resources will be required to engage and investigate the activity. Local units will also be asked to attend the site when security checks identify items that are illegal or prohibited, or incidents identified by security where warranted powers are required.

- Licensing – bars, restaurants and clubs will need a proportionate policing response. Officers will need to undertake license checks to ensure compliance with conditions and any incident within a licensed premise will need to be reviewed by the Constabulary.

- Visible patrols – any increase in crime, or perceived increase in risk, results in heightened community concerns and tensions. The most effective way to reassure the community is to provide visible policing patrols into those areas where concern has escalated, which requires resources to be diverted from other commitments. Whilst data presented above helps to represent the time and resources needed to deal with particular types of crime, it cannot accurately reflect the additional time and resources needed to undertake additional patrols and to be visible, supportive and engaging with the public in the aftermath of incidents.

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

- Protests – spontaneous and prolonged protests will be assessed at the time and resources allocated to it. This may be local officers or specialist officers, either way they would be abstracted from the shift strength at that given time. In the absence of additional resourcing, this would create weakness in the overall workforce strength to manage the protest and maintain the current standard of police service.

- Crime prevention work – local SNT resources promote crime prevention, this will be both on and off site. The effective delivery of crime prevention messages can significantly influence the level of activity that requires further police resources by stopping incidents and crimes occurring.

- Suspicious incidents – where local residents become concerned about "activity" that is suspicious, the police will be called. This could mean potential drugs dealing, cars parked outside houses, groups gathering, the behaviour of individuals and other behaviour that concerns people. What is reported will drive the level of police response required.

- Safeguarding Investigation Unit (SIU) – where concerns are raised regarding the safety or wellbeing of a minor (aged under 18) the Safeguarding Investigations Unit will conduct a visit, sometimes jointly with Social Services. SIU investigations vary in length and can be very resource intensive, often taking months of police involvement and work. With the arrival of family members and children, it is expected that this will create additional demand on SIU resources.

- Hate crime prevention work – as the SZC construction workforce is like to be diverse, the Leiston SNT will need to engage with the Applicant and orders around hate crime. It is expected that a large number of these engagements will be on site.

- Parking and congestion – Notwithstanding proposed parking related mitigation measures, there is a real concern around the potential for fly parking in Leiston and the immediate surrounding area. The Applicant has continued to experience such problems at HPC, which has had an impact on their workforce and caused tensions within the local community. Many of the residential roads within Leiston (and other areas) are already at a saturation point and any increase in parked vehicles will cause obstructions. The main entrance to the SZC main development site is due to be located on the B1122 which is a single lane, two-way road. It is one of the main routes into Leiston which, if congested due to illegal parking would impact on local and SZC traffic.

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

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

**Summary**

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

# 5 Concerns Regarding the Applicant's Approach

## 5.1 Overview

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

## 5.2 Narrow Scope of Published Community Safety & Policing Impact Assessment

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

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

- **Narrow scope of assessment -** the singular focus of the small policing impact assessment (Paragraphs 9.7.216 – 9.7.23 of Chapter 9 (Socio-economics) of the ES (APP-195) on the reporting of 'recorded' (i.e. Home Office notifiable) crimes, rather than considering wider community safety impacts which are likely to require police involvement and thus place resourcing demands upon the Constabulary.

- **Limited consideration of demographic factors** – the quantitative assessment of population dynamics undertaken in Chapter 9 (Socio-economics) of the ES (APP-195) does not appear to have been factored into the assessment of resulting community safety impacts (i.e. resulting from higher risk demographic profile and concentration of the NHB construction workforce in a rural community).

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

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

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

## 5.3 Why Reliance on HPC SEAG Data Is Inappropriate

5.3.1 In recent correspondence and meetings held between the Applicant and the Constabulary to inform the preparation of this PIA (to address the assessment gap identified above), the Applicant has suggested that any modelling of policing impacts from SZC should be based on policing data collated by the HPC Socio-economic Advisory Group ('SEAG') in order to account for their workforce characteristics. This position is not accepted by the Constabulary owing to known weaknesses with the HPC SEAG data (including under-reporting). Also, the introduction of a workforce population in one demographic, socio-economic and geographical situation cannot be predicted to generate the same community safety impacts in an entirely different situation, even if the same NHB workers were involved. The Constabulary is therefore concerned regarding an over reliance by the Applicant upon the perceived experience of the construction of HPC project within the Avon and Somerset Police) area to seek to predict community safety and policing impacts from the SZC project in Suffolk.

5.3.2 It should be noted that SEAG reports have evolved since 2017 and thus do not present comparable data over the HPC construction period, including regarding what data is included and how data is broken down. This has been confirmed by the HPC 'Beat Team' as a known issue which affects the ability to use the SEAG data to present a full picture of policing impacts arising from HPC. Policing data collated by the HPC SEAG is also known to suffer from other quality issues, including inconsistencies and inaccuracies in the recording of incidents. Further information on the poor data quality of SEAG data is presented in Appendix C.

5.3.3 The Applicant has identified three sources of policing (crime and non-crime) data reported by Avon and Somerset Police to the HPC Socio-economic SEAG. Issues associated with each of these which undermine the reliability of the SEAG data and mean that it is not appropriate to use as a modelling input for SZC are outlined in turn below.

### Automatic Tagging

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

5.3.5 HPC SEAG returns are based on CADs[7]/investigations being flagged or tagged as relating to HPC (including indirectly via the NHB workforce and associated families). It is well reported within policing and academic quarters that this process is known to be inconsistent as crimes and incidents can be missed from being tagged or wrongly categorised. Numerous studies have shown there are weaknesses associated with police use of tagging/flagging with regards to mental health, digital/online crime and hate crime – all of which involve mandatory tagging by the Home Office. One known issue with tagging/flagging is officers forgetting to include a specific tag/flag during the height of an investigation.

5.3.6 Another concern is that unlike a specific event or crime case (often geographically specific and time limited) where related incidents or reports can relatively be easily identified, incidents involving or affecting members of the SZC NHB workforce or their families may be otherwise completely unrelated to SZC and dispersed amongst reports of other incidents across the force area.

5.3.7 To work effectively, tagging/flagging requires caller/victim/person reporting to use a key word relating to HPC/EDF for it to be tagged as related to it. If the incident is not addressed by the HPC Beat Team (e.g., due to limited operating hours and staffing) and does not relate to a place of employment or a group of employees, it is unlikely an individual reporting would think to volunteer that information without prompting. Additionally, the terms of proposed SZC Code of Conduct mean the Applicant's workers may be less likely to volunteer to the Constabulary their connection with HPC if they have committed an offence or fear their behaviour being reported back to their employers.

### Security Response Occurrence Forms

5.3.8 Security Response Occurrence Forms ('SORFs') are generated by HPC's on-site security team, led by a former police officer, rather than coming directly from the Constabulary. The response from the Applicant dated 29th April 2021 states that SORFs are shared with the Avon and Somerset Police/HPC policing team to add to the SEAG statistics where these relate to a crime.

5.3.9 Whilst the use of SORFs would be supported as promoting regular dialogue between the on-site security team and the Constabulary, they are an inappropriate mechanism for statistical reporting and interpretations between HPC and SZC due to clear potential for inconsistencies.

5.3.10 SORFs are produced by HPC's on-site security team and only those deemed relevant are passed to Avon and Somerset Police, including where further investigation may be required. However, it cannot be guaranteed that a civilian on-site security team will adopt the same position as a Constabulary (whether Avon and Somerset Police or Suffolk) regarding the relevance of every incident or any potential need for subsequent police resourcing.

5.3.11 The significant local experience of HPC's on-site security team combined with the working relationship between the Applicant and Avon and Somerset Police

[7] Computer Aided Dispatch

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

#### Incidents dealt with by HPC Beat Team

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

#### Summary

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

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

### 5.4 Limitations of HPC Beat Team Model

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

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

- Work dealt with by the HPC Beat Team is often activity that is handed to the Beat Team from other departments including CCR, Roads Policing, NRT and CID. Therefore, by default, work has already had to have been completed by officers outside of the EDF funded Beat Team. The level of work that has been completed by other resources before it is passed onto the funded Beat Team will vary depending on the specific incident; Appendix D provides examples of where additional resourcing to the Beat Team may be required for each SEAG crime classification. This suggests Avon and Somerset may have had to absorb significant net additional policing demand generated by HPC through existing resources.

- Without prejudice to operational decisions made by Avon and Somerset Police or to any mitigation agreements reached between EDF and Avon and Somerset Police in respect of HPC, it is clear Suffolk and Avon and Somerset Police have different operational models and resourcing capacities, such that the Constabulary is less able to absorb any net additional increase in policing demands without additional resources.

- Under the Police and Criminal Evidence Act ('PACE'), that there is a responsibility for the police to progress issues when a person is placed in custody in the most expeditious way (as an individual is having their liberty infringed upon). This means that the arresting officer, whichever team they are drawn from, will be fully engaged within the process to progress enquiries in the most expedient manner without delay. The period that the initial arresting officer is engaged in the process, will depend on the type and severity of the incident and so the number of enquiries that will need to be followed. The implications of PACE requirements are A) if the arresting officer is from the Beat Team they will be abstracted from their shift and any scheduled events i.e. site visits or talks to HPC staff, so the need for resilience within the Beat Team is paramount B) If the arresting officer is outside the Beat Team, the arresting officer cannot pass the workload onto the Beat Team until the arresting officer has progressed to the appropriate stage that allows for an appropriate handover. This again means that work is likely to have been absorbed by officers outside of the funded HPC Beat Team, even if the case is then handed over to the Beat Team.

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

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

5.4.4 Additionally, when responding to a call of a significant nature there is the issue of needing to apply the “Golden Hour Rule”. The golden hour is the term used for the period immediately after an offence has been committed, when material is readily available in high volumes to the police.

5.4.5 Positive action in the period immediately after the report of a crime minimises the amount of material that could be lost to the investigation and maximises the chance of securing the material that will be admissible in court. To properly undertake this action, there will be a need to pool resources from those units on duty at the time, again exhibiting that a limited Beat Team cannot have the capacity to address the resource requirements.

## 5.5 Importance of Employment Status for Crime Modelling

5.5.1 The Applicant has suggested that the Constabulary’s police resourcing impact model should control for employment status. Unlike age and gender, employment status is not recorded by the Constabulary or any other police force in the country. Neither victims nor suspects are obliged to share this information with the police. Additionally, evidence from academic literature indicates that the relationship between employment status and crime is unclear.

5.5.2 There are four main problems commonly faced in trying to establish any relationship between unemployment and crime (or the absence of a relationship from an employed workforce):

- Crime is committed by both unemployed and employed people and that periods of historic employment levels have seen an increase in certain types of crime.

- There is limited data available to link economic status to criminal investigations as the police routinely record this.

- Studies usually focus on property crimes, rather than crime as a whole or other crime types. Successive studies (usually in America) have showed that there is a correlation between property crime and unemployment. However, correlation is not causation and most of the studies do not include multivariate modelling or control in their regression analysis.

- Most significantly, there is an endogeneity issue with trying to establish a causal relationship between unemployment and crime as unemployment could be either the cause or the effect of crime: ie someone commits crime because they are unemployed or are unemployed because they commit(ed) crime and lost their job as a result. Endogeneity makes establishing causal factors difficult and almost always open to dispute and interpretation.

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

## 5.6 Limited Impact of Embedded Mitigation

### Worker Code of Conduct

5.6.1 It is acknowledged that the Applicant has placed great a deal of weight on the Worker Code of Conduct as a tool to mitigate the community safety impacts of the SZC workforce. Whilst the exact details of the Worker Code of Conduct has yet to be formally agreed, it is the power of the Worker Code of Conduct as a tool to influence worker behaviour that needs to be established.

5.6.2 The Worker Code of Conduct does not provide a legal gateway for the Constabulary to disclose information for non-policing purposes. The Constabulary has to rely on another policing power. When the Constabulary are responding to or investigating an incident any victim, witness or suspect does not have to provide any detail regarding their profession or their employer details. This then causes two issues:

- If an individual commits a criminal act and is dealt with by the Constabulary, the Constabulary would not be aware of the individual's link to SZC and the position they hold.

- If the individual did volunteer the information to confirm they are employed on the construction site (or associated sites) the rules around any disclosure to their employer or regulatory body is very much limited. Common Law Police Disclosure '(CLPD') has replaced the Notifiable Occupations Scheme ('NOS'). CLPD provides a way to pass on relevant and necessary information where there is a public protection risk so that the employer can act swiftly to mitigate any danger by putting in place safeguarding measures. Disclosure will be made when there is an urgent social pressing need and must be balanced with the individual's human rights and welfare needs. This can occur at the point of arrest, charge, voluntary attendance or receipt of information indicating an SCZ worker may present a risk to the public. Disclosure cannot occur unless there is an urgent and serious risk. This will mean the large proportion of situations will fall outside of these parameters.

5.6.3 In both of the above cases, the Constabulary will not be in a position to provide the Applicant (or the individuals employer) with the fact that they have been involved in any criminal activity.

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

5.6.4 The Applicant will be unable to apply to the Constabulary for any data related to their workers under the “Subject Access” route as the information is personal to the individual involved. It would be unlawful for the Applicant to request a worker submits a subject access request themselves. That is referred to as Enforced Subject Access and is a criminal offence under the Data Protection Act 2018.

5.6.5 Whilst the Worker Code of Conduct is welcomed, it does not provide a robust means to prevent any criminal act, disorderly behaviour or anti-social behaviour. It will not provide a platform for information to be shared to the Applicant. For these reasons, it is not appropriate to seek to quantify the impact of the Worker Code of Conduct in deterring crime incidents. There is insufficient monitoring and evaluation evidence to robustly suggest a percentage reduction in incidents, or any other quantifiable metric by which it could be reliably incorporated.

### Security Vetting

5.6.6 The Constabulary understands that all staff working on the SZC project will undergo security vetting. However, the Applicant has not confirmed what level of vetting and what criteria will be applied. The acceptance thresholds for roles have also not been disclosed i.e. what type of previous criminal record would mean a would-be employee would not be recruited for the SZC project.

5.6.7 Whilst the vetting is welcomed, the Constabulary cannot view the Applicant’s vetting as a tool that will reduce policing impact. Through dialogue with colleagues in Avon and Somerset it is known that despite having undergone vetting, some EDF workers who have come into contact with the police are found to have criminal records that from a policing stance, would have made them likely candidates to recommit certain crimes or activities.

# 6 Suffolk Constabulary Police Resourcing Assessment Methodology

## 6.1 Overview

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

- Annual average NHB workforce figures provided by the Applicant to model likely policing demands and associated resourcing requirements arising from the NHB workforce population during the construction of the SZC project. This approach is underpinned by use of the NPCC standard officer cost rate.

- A proportionate risk-based approach to predict the volume of AIL movements likely to require police escort during the construction period, taking account of other proposed traffic mitigation measures.

## 6.2 Population Based Policing Demand – Input Data

### Modelling based on Observed Characteristics in Suffolk and Predicted SZC Workforce

6.2.1 Community safety and policing impacts are predicted to occur during the construction phase of the SZC project due to factors including substantial demographic changes resulting from the predicted NHB construction workforce[9]. The demographic profile of this workforce is likely to be significantly different from the demographic profile of Leiston and Suffolk as a whole.

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

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

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

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

### Construction Workforce Demographics

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

Table 6.1: Assumed age and gender breakdown of construction workforce

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

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

### Age and Gender Weightings

6.2.6 The Constabulary has analysed observed arrest, suspect, non-crime incident, and victim data to determine the proportional involvement of different age and gender groups in driving police demand. The rates of these incidents vary depending upon the demographics of the population. Table 6.2 and Table 6.3 below show the number and proportion of incidents involving various age and gender groups~~.~~[11]. Table 6.4~~3~~ then applies the following formula to derive age and gender weighting factors:

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

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

[10] 2011 Census data for the Construction Industry, supplied by QUOD (12/08/2020)
[11] The recording periods for total incidents vary depending on data availability.

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

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

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

| | Population (mid-2018) | | | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 65,966 | 63,094 | **129,060** | 741 | 312 | **1,053** | 2,720 | 1,053 | **3,773** | 31,841 | 29,489 | **61,330** | 1,726 | 1,711 | **3,437** |
| **Young Working Age** | 61,410 | 57,121 | **118,531** | 16,117 | 2,825 | **18,942** | 10,896 | 3,544 | **14,440** | 31,275 | 34,541 | **65,816** | 5,189 | 5,862 | **11,051** |
| **Mid-Working Age** | 64,974 | 65,032 | **130,006** | 11,638 | 2,492 | **14,130** | 8,552 | 3,000 | **11,552** | 26,731 | 28,492 | **55,223** | 4,818 | 5,199 | **10,017** |
| **Older Working Age** | 100,445 | 103,915 | **204,360** | 5,394 | 1,138 | **6,532** | 4,355 | 1,567 | **5,922** | 18,089 | 17,263 | **35,352** | 5,155 | 4,126 | **9,281** |
| **Younger Retired** | 62,176 | 67,078 | **129,254** | 523 | 71 | **594** | 666 | 234 | **900** | 4,473 | 4,317 | **8,790** | 1,517 | 1,166 | **2,683** |
| **Older Retired** | 21,027 | 29,112 | **50,139** | 50 | 1 | **51** | 158 | 84 | **242** | 2,172 | 2,985 | **5,157** | 316 | 525 | **841** |
| **All ages** | **375,998** | **385,352** | **761,350** | **34,463** | **6,839** | **41,302** | **27,347** | **9,482** | **36,829** | **114,581** | **117,087** | **231,668** | **18,721** | **18,589** | **37,310** |

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

| | Population (mid-2018) | | | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 9% | 8% | **17%** | 2% | 1% | **3%** | 7% | 3% | **10%** | 14% | 13% | **26%** | 5% | 5% | **9%** |
| **Young Working Age** | 8% | 8% | **16%** | 39% | 7% | **46%** | 30% | 10% | **39%** | 13% | 15% | **28%** | 14% | 16% | **30%** |
| **Mid-Working Age** | 9% | 9% | **17%** | 28% | 6% | **34%** | 23% | 8% | **31%** | 12% | 12% | **24%** | 13% | 14% | **27%** |
| **Older Working Age** | 13% | 14% | **27%** | 13% | 3% | **16%** | 12% | 4% | **16%** | 8% | 7% | **15%** | 14% | 11% | **25%** |
| **Younger Retired** | 8% | 9% | **17%** | 1% | 0% | **1%** | 2% | 1% | **2%** | 2% | 2% | **4%** | 4% | 3% | **7%** |
| **Older Retired** | 3% | 4% | **7%** | 0% | 0% | **0%** | 0% | 0% | **1%** | 1% | 1% | **2%** | 1% | 1% | **2%** |
| **All ages** | **49%** | **51%** | **100%** | **83%** | **17%** | **100%** | **74%** | **26%** | **100%** | **49%** | **51%** | **100%** | **50%** | **50%** | **100%** |

Table 6.4: Incident weighting factors by age group and gender

| | Arrests (2016 - 2019) | | | Suspects (2019) | | | Non-crime (2016 - May 2021) | | | Victims (2017 - 2020) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Total | Male | Female | Total | Male | Female | Total | Male | Female | Total |
| **Young** | 0.21 | 0.09 | **0.15** | 0.85 | 0.35 | **0.60** | 1.59 | 1.54 | **1.56** | 0.53 | 0.55 | **0.54** |
| **Young Working Age** | 4.84 | 0.91 | **2.95** | 3.67 | 1.28 | **2.52** | 1.67 | 1.99 | **1.82** | 1.72 | 2.09 | **1.90** |
| **Mid-Working Age** | 3.30 | 0.71 | **2.00** | 2.72 | 0.95 | **1.84** | 1.35 | 1.44 | **1.40** | 1.51 | 1.63 | **1.57** |
| **Older Working Age** | 0.99 | 0.20 | **0.59** | 0.90 | 0.31 | **0.60** | 0.59 | 0.55 | **0.57** | 1.05 | 0.81 | **0.93** |
| **Younger Retired** | 0.16 | 0.02 | **0.08** | 0.22 | 0.07 | **0.14** | 0.24 | 0.21 | **0.22** | 0.50 | 0.35 | **0.42** |
| **Older Retired** | 0.04 | 0.00 | **0.02** | 0.16 | 0.06 | **0.10** | 0.34 | 0.34 | **0.34** | 0.31 | 0.37 | **0.34** |
| **All ages** | **1.69** | **0.33** | **1.00** | **1.50** | **0.51** | **1.00** | **1.00** | **1.00** | **1.00** | **1.02** | **0.98** | **1.00** |

## 6.3 Population Based Police Resourcing Implications – Model Parameters

### Number of Incidents

6.3.1 The number of additional incidents associated with the NHB workforce has been estimated by applying per-capita rates of investigations, arrests, and emergency and non-emergency calls observed across Suffolk.

6.3.2 This approach accounts for the expected demographic profile of the SZC construction workforce by applying the age and gender weightings outlined in Table 6.4 above. Using the unadjusted per-capita incident rates would only be appropriate if the demographics of the NHB construction workforce closely mirrored the existing demographic profile of Suffolk. As Table 6.5 below shows, this is not the case.

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

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

6.3.3 The Applicant predicts that the majority of the NHB workforce (88%) will be male, and over two-thirds (67%) will be between the ages of 20 and 49. The population of Suffolk, by contrast, is significantly older with the majority (54%) aged 50 or above.

6.3.4 To illustrate this process, Table 6.6 below presents the calculation of the anticipated number of criminal investigations associated with the NHB workforce in each year.

Table 6.6: Anticipated criminal investigations

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

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

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

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

Table 6.7: Anticipated number of incidents, Local Policing only

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

### Resourcing Requirements

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

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

Table 6.8: Incidents per Local Policing officer, 2019

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

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

Table 6.9: Resourcing requirements, Local Policing only

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

6.3.10 In accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.

6.3.11 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.

6.3.12 For the avoidance of doubt, the Constabulary will use the nationally recognised NPCC full cost recovery rate for police officers which will include associated vehicles, training, and police staff. As such, while Custody and CCR have been included in the modelling, only the net increase in Local Policing resource requirements will be sought for mitigation.

## 6.4 Construction Traffic Based Policing Demand and Resourcing Implications - Approach

### Road Safety Issues

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

### Police Escorts for AIL Movement

6.4.2 As raised previously in this WR, the prime concern of the Constabulary's relates to impacts on roads policing as a consequence of the construction phase for SZC is the management of a substantial volume of AIL movements.

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

### Context

6.4.4 In accordance with relevant NPCC guidance, the routine escorting of vehicles falling within the provisions of the STGO ('AILs') under normal network operations does not normally require to be carried out by the Constabulary and in most cases is carried out by hauliers themselves. Crucially however, this is dependent upon the route and specific characteristics of each proposed AIL movement, review of submitted Movement Notices[12] and the outcome of a specific risk assessment made by the Constabulary's Abnormal Loads Officer. Exceptions may and do occur where no alternative arrangement can adequately ensure public safety, such as where Highway regulations have to

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

be contravened during the movement of the AIL and associated vehicle, such that police escorting is required[13].

6.4.5 Under current arrangements, police assistance can also be requested by hauliers for managing specific pinch points on the route (e.g. travelling on the wrong side of keep left instructions). This is a pro gratis service that is offered if, and when, there is police operational capacity to assist. Although booked in advance, operational requirements take precedence, which can result in delays for the haulier while they wait for officers to be available.

6.4.6 Current restrictions on AIL movements normally govern roads, times and/or days that a load is permitted to move. In accordance with Policy No 19 published by Norfolk and Suffolk Constabularies on December 2016[14], this normally prevents an AIL from travelling during:

- Bank holidays and weekends;
- The hours of darkness, except the A12 Essex Border to A14 Copdock Interchange and A14 Felixtstowe to Cambridge Border with width, weight and length restrictions;
- During periods where a major event has been planned;
- At certain times of days such as “rush hours” and high commuter traffic between 07:30 – 09:00 and 16:30 -18:00; and
- Other times at the discretion of the Abnormal Loads Officer.

6.4.7 These restrictions, which are in place to protect the functioning of the road network and public amenity from unacceptable impacts, are likely to cause significant challenges to the efficient movement of high volumes of AILs across Suffolk’s road network over a sustained period.

### SZC AIL Movements Likely to Require Police Escort

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

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

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

**The Constabulary's AIL Escort Matrix**

**This Matrix provides a risk assessed guide for the movement of AILs during the SZC construction period. All AIL movements are subject to review by the Constabulary's Abnormal Loads Officer; where the full extent of the route ar specific load dimension will be assessed and the appropriate level of risk determined.**

**Key**

**High Risk (Red)** – Recommended that vehicles should have Police Escort
**Medium Risk (Amber)** – Police escort is recommended, although hauliers may choose to self-escort; however, police assistance may be required at specific points.
**Medium-Low Risk (Light Green)** – Hauliers should consider Self-Escort for the vehicle
**Low Risk (Dark Green)** – No Escort Required

| | A14 | A12 Lowestoft to Leiston | A12 Woodbridge to Leiston | B1122 Lovers Lane | A145 |
|---|---|---|---|---|---|
| VR1 | | | | | No AILs Permitted |
| Special Order | | | | | No AILs Permitted |
| STGO Cat 3 | | | | | No AILs Permitted |
| STGO Cat 2 | | | | | No AILs Permitted |
| STGO Cat 1 | | | | | No AILs Permitted |
| >5m wide | | | | | No AILs Permitted |
| 4.4m - 5m wide | | | | | No AILs Permitted |
| 3.5m - 4.4m wide | | | | | No AILs Permitted |
| 2.9m - 3.5m wide | | | | | No AILs Permitted |
| <2.9m wide | | | | | No AILs Permitted |
| Length <18.64m | | | | | |
| Length between 18.65m - 27.3m | | | | | No AILs Permitted |
| Length between 27.4m – 30m | | | | | No AILs Permitted |
| | A14 | A12 Lowestoft to Leiston | A12 Woodbridge to Leiston | B1122 Lovers Lane | A145 |

Figure 6.1: AIL Management Matrix

6.4.9 The categories of AIL anticipated for the SZC project have been applied to the standard guidelines for each section of the access routes. A pragmatic risk assessment has informed when the Constabulary considers AILs should either be allowed to travel to the main works site or associated developments without a private escort; when a private escort would be required; when a Police escort would be required; or police assistance advised.

6.4.10 The Matrix proposed sets out the risk assessment and application of the guidelines. During the construction of SZC this matrix would be applied to all AILs using the defined routes, irrespective of their association with SZC. The matrix provides a guide as to the escorting of AILs. However, as with all AIL movements these are subject to the final sign off by the Abnormal Loads

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

6.4.11 The proposed matrix reflects an increased intervention by the Constabulary to assist with the more efficient and safe operation of AILs to SZC both prior to and following the mitigation measures proposed by the Applicant. The construction of the Two Villages' Bypass and the Sizewell Link Road ('SLR') will circumvent some areas of safety concern along the access corridors but will not remove all concerns or remove all points at which AILs would be required to contravene road regulations. There would, therefore, continue to be a much-increased demand on the Constabulary's Abnormal Loads unit and associated trained officers.

6.4.12 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day (*EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021*). These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.

6.4.13 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL movements requiring police escort during the SZC construction period. Additional resources are therefore required, in the form of a dedicated AIL Unit, to allow the Constabulary to facilitate the proposed construction period for SZC and associated passage of AILs along Suffolk's road network in an efficient and safe manner.

6.4.14 The Applicant has commissioned Wynns Limited to prepare a review of the feasibility of the use of the identified AIL access routes by selected types of vehicle and load combinations (*Abnormal Indivisible Load (AIL) Access Report Sizewell C – 07.04.21 – copy currently provided informally by EDF).* That report identifies a series of challenges with access to SZC where AILs would be required to occupy the full width of the road and could oversail beyond the carriageway. It indicates that vehicle and load combinations would be required to use dedicated AIL infrastructure and over-run areas within modified and new junctions. Where AILs are required to operate in this manner, it is essential for police escorts to safely manage the network around that movement. The Wynns report substantiates the Constabulary's concerns.

# 7 Population Based Community Safety and Policing Impacts

## 7.1 Overview

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

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

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

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

## 7.2 Local Policing

### Existing Demand and Resourcing

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

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

### Operational Structure

7.2.3 In 2019 police officers dealt with 80,102 investigations. The Constabulary currently has an establishment of 1,219 FTE[15] police officers that provide 24-hour coverage throughout the year. This equates to each police officer dealing with an average of 65.7 investigations in a year, which is one of the highest workload figures for policing in England.

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

- **Neighbourhood Response Teams (NRTs):** Any urgent graded calls into the CCR will be allocated to the NRT's. The NRT officers aim to arrive at the scene of an incident within 15 minutes in an urban area or 20 minutes in a rural location from the time of the call. The range of incidents that NRT's respond to can be anything from missing people, reports of crime where incidents are occurring at the time, mental health, road traffic collisions and incidents that are time critical.

- **Safer Neighbourhood Teams (SNTs):** SNT's work alongside the NRT's to provide a community policing team that manages longer-term community problems. The issues can range from neighbourhood disputes to complex and protracted community issues that require a substantial amount of resources and time, often engaging other key partners, to resolve.

- **Criminal Investigation Department (CID):** CID will normally investigate and manage more complex criminal investigations including domestic burglaries, high value acquisitive crime, robberies, high value fraud and investigations where there is high risk of harm including stalking and harassment cases.

- **Safeguarding Investigation Unit (SIU):** The SIU will investigate criminal cases where the allegation is of a serious sexual nature or its involving child abuse. The SIU has officers who work closely with the social services team

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

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

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

Table 7.1: Local Policing Resources

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

### Existing Demand

7.2.6 Demand on local policing includes the following:

- **Criminal investigations**: in 2019, there were 1,120 criminal investigations recorded within the Leiston SNT area; accounting for 10% of total number of criminal investigations recorded for Eastern Policing Area that year and 2% of the total for the whole of Suffolk.

- **Non-crime investigations**: involve crimes or incidents that do not need to be reported to the Home Office (non-notifiable) but still need to be recorded, such as domestic violence, child protection investigations, ASB, missing person investigations and mental health calls

- **Other additional demands**: five additional key areas which have an impact on police resources: Mental health episodes, suicides, missing person investigations, unmeasured demand and community tensions/liaison. The demand generated by these events are not recorded in the crime or non-

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

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

### Forecast Demand from Construction Workforce

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

7.2.9 For brevity Table 7.2 overleaf presents the annual average staffing requirement. It should be noted that the Constabulary has also modelled 6 month split average resourcing periods to which more closely tracks fluctuations in demand.

Table 7.2: Predicted Average Annual Local Policing Demand

| Construction Year | Average Annual NHB Workforce | NHB Criminal Investigations | NHB Non-Crime Investigations | NHB Missing Person Investigations | NHB Mental Health Callouts | Family Criminal Investigations | Family Non-Crime Investigations | Family Missing Person Investigations | Family Mental Health Callouts | Combined Increase in Criminal Investigations | Combined Increase in Non-Crime Investigations | Combined Increase in Missing Person Investigations | Combined Increase in Mental Health Call Outs | Total Increase in Local Policing Demand | Local Policing Officer Workload | Local Policing Officers FTE Requirement |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | 524 | 7675.0 | 1313.0 | 11.0 | 22.0 | 888.0 | 327.0 | 16.0 | 14.0 | 84163.0 | 1640.0 | 27.0 | 36.0 | 105216.0 | 65.7 | 24 |
| 2 | 1062 | 154151.0 | 2525.0 | 22.0 | 44.0 | 1688.0 | 527.0 | 16.0 | 14.0 | 170239.0 | 3052.0 | 38.0 | 58.0 | 208307.0 | | 45 |
| 3 | 2134 | 309302.0 | 5050.0 | 33.0 | 77.0 | 3288.0 | 1027.0 | 26.0 | 24.0 | 341390.0 | 6077.0 | 59.0 | 911.0 | 415487.0 | | 78 |
| 4 | 3019 | 436428.0 | 7070.0 | 55.0 | 1010.0 | 4588.0 | 1427.0 | 36.0 | 24.0 | 481516.0 | 8497.0 | 811.0 | 1214.0 | 585638.0 | | 910 |
| 5 | 4347 | 628615.0 | 100100.0 | 66.0 | 1414.0 | 6588.0 | 2027.0 | 46.0 | 34.0 | 693703.0 | 120127.0 | 1012.0 | 1718.0 | 840860.0 | | 1314 |
| 6 | 5024 | 726711.0 | 116116.0 | 77.0 | 1616.0 | 7588.0 | 2327.0 | 56.0 | 44.0 | 801799.0 | 139143.0 | 1213.0 | 2020.0 | 972975.0 | | 1515 |
| 7 | 5780 | 835818.0 | 133133.0 | 88.0 | 1818.0 | 8688.0 | 2727.0 | 66.0 | 44.0 | 921906.0 | 160160.0 | 1414.0 | 2222.0 | 11171102.0 | | 1717 |
| 8 | 4726 | 683669.0 | 109109.0 | 77.0 | 1515.0 | 7188.0 | 2227.0 | 56.0 | 34.0 | 754757.0 | 131136.0 | 1213.0 | 1819.0 | 915925.0 | | 1415 |
| 9 | 2721 | 393385.0 | 6363.0 | 44.0 | 99.0 | 4188.0 | 1327.0 | 36.0 | 24.0 | 434473.0 | 7690.0 | 710.0 | 1113.0 | 528586.0 | | 99 |
| 10 | 920 | 133131.0 | 2222.0 | 22.0 | 33.0 | 1488.0 | 527.0 | 16.0 | 14.0 | 147219.0 | 2749.0 | 39.0 | 47.0 | 181283.0 | | 35 |
| 11 | 589 | 8684.0 | 1414.0 | 11.0 | 22.0 | 988.0 | 327.0 | 16.0 | 14.0 | 95172.0 | 1741.0 | 28.0 | 36.0 | 117226.0 | | 24 |
| 12 | 283 | 4141.0 | 77.0 | 11.0 | 11.0 | 588.0 | 227.0 | 16.0 | 14.0 | 46129.0 | 934.0 | 27.0 | 25.0 | 59175.0 | | 13 |

## 7.3 Custody Management

### Existing Demand and Resourcing

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

### Operational Structure

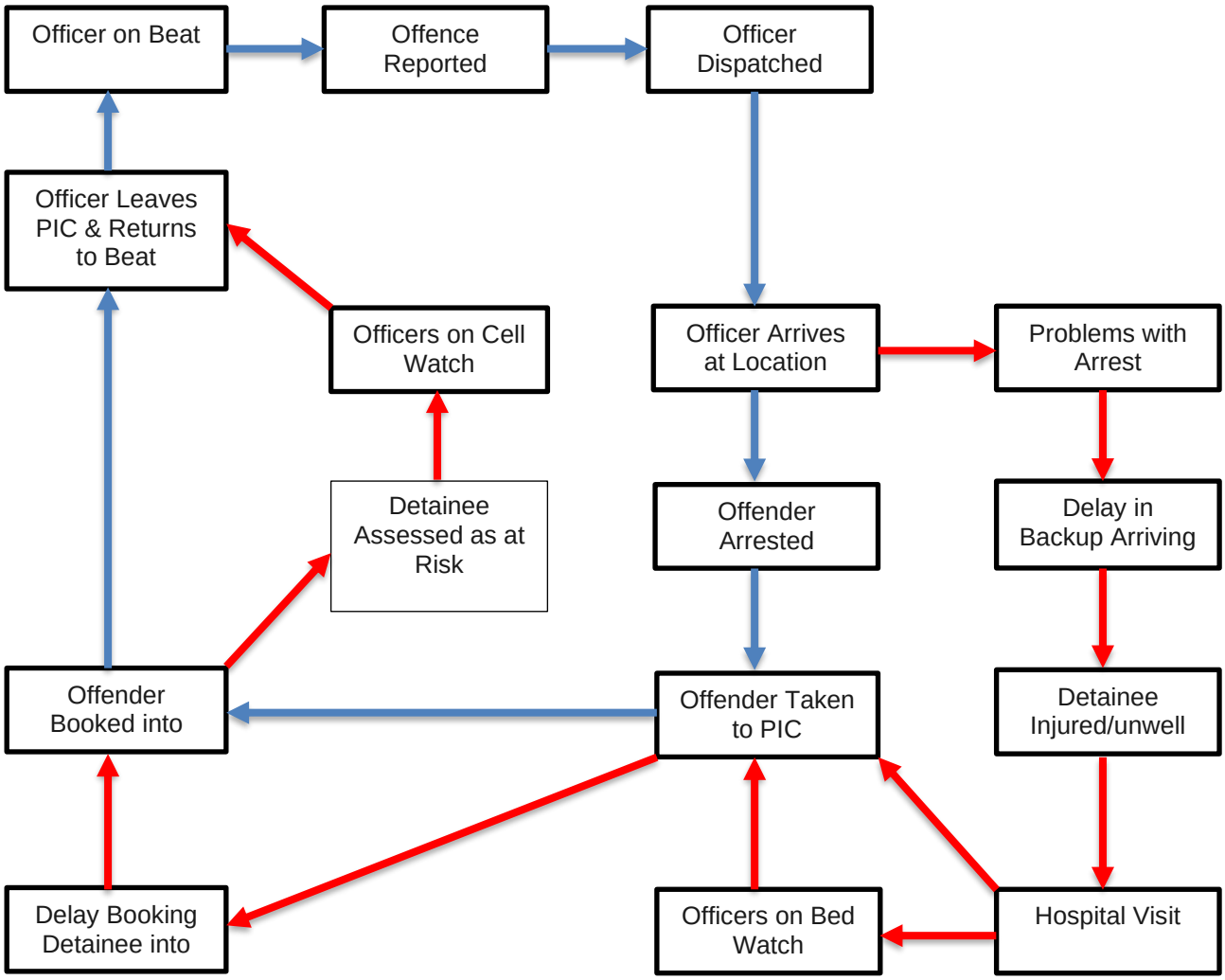
7.3.2 Custody for the Halesworth police jurisdiction is covered by all three of the Constabulary's Police Investigation Centres (PIC): Bury St Edmunds (approximately 44 miles), Martlesham (approximately 19 miles) and the last at Great Yarmouth (approximately 33 miles). The PIC at Great Yarmouth is shared with Norfolk Constabulary.

7.3.3 Each PIC is staffed by police officers and staff, but due to the specialist nature of the work conducted in the PIC, these resources need specific training to the agreed national level. This means that the staff capable of working within a PIC are restricted; not all staff can work duties that fall within the PIC.

### Custodial Process

7.3.4 Upon arrest the arresting police officers are directed to the nearest PIC with capacity and cell space in order to book the detainee into custody and follow a set of statutory actions under the Police and Criminal evidence Act 1984. For this reason, whilst the three PICs have distinct geographical locations, custody is treated a county wide resource as an arrested person could be sent to any of the PICs.

7.3.5 As Figure 7.1 shows, arrests are by nature time consuming and resource intensive - particularly as the Constabulary policy requires a minimum of two officers to transport the detainee to the closest PIC with capacity. The blue arrows show a typical arrest while the red show some of the difficulties and delays officers can face during the arrest process.




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

Figure 7.1: Arrest process

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

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

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

[16] 45 minutes minimum travel time to the nearest PIC with capacity, 30 minutes hand over/booking in time to transfer the detainee to custody followed by 45 minutes travel back to base/officer beat.
[17] 60 - 90 minutes travel to the nearest hospital to the destination PIC, 3-hour triage waiting time in A&E (NHS average A&E waiting time 2018, NHS Digital and NHS England), 15 minutes travel time from hospital to PIC. 1 – 2 hour waiting time to book in detainee during busy periods, 60-minute drive back to base/officer beat.

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

### Current Resource Capabilities

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

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

Table 7.3: Current custody staffing levels

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

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

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

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

### Existing Demand

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

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

### Forecast Demand from Construction Workforce

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

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

Table 7.4: Predicted Average Annual Custody Demand

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

## 7.4 Contact and Control Room

### Existing Demand and Resourcing

7.4.1 The Constabulary's Contact and Control Room ('CCR') at the Constabulary's Headquarters, Martlesham, handles all calls and co-ordinates action taken by the Constabulary's, including but not limited to responding to emergency incidents. This section outlines the Constabulary's current demand and resourcing structure in respect of CCR before setting out forecasted additional demands likely to be generated by SZC.

7.4.2 In 2019 there were 110,448 999 calls handled by the CCR in the Constabulary. This is the equivalent of 302 emergency calls every day throughout the year. Contact with the CCR is often the first point of engagement with the Constabulary and those calling are often in a state of high anxiety. It is therefore imperative that the appropriate level of service is afforded at this critical junction as a 'right service at first point of contact', approach leads to reduced demand on resources further on. The PCC requires the Constabulary to answer 999 within a set time; performance against this is reported regularly and the Chief Constable is held to account on meeting this target.

7.4.3 The Constabulary's CCR is presently operating at capacity – any increase in call volume will impact the Constabulary's continued ability to respond to 999 (emergency) and 101 (non-emergency) calls within the mandatory response times set out by the government[18]. The current performance target is 90%, the Constabulary are currently averaging a 91% call answering target. Any additional calls generated by SZC will negatively impact the Constabulary's continued ability to meet this target. A rise in call volume will also have implications for local policing services and the Crime Co-ordination Centre ('CCC') which deals with volume crime and non-emergency crime reports. An increase in calls to the CCR will have a corresponding increase in the demand managed by the CCC.

### Call Triage Process

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

[18] 999 calls should be answered within 10 seconds

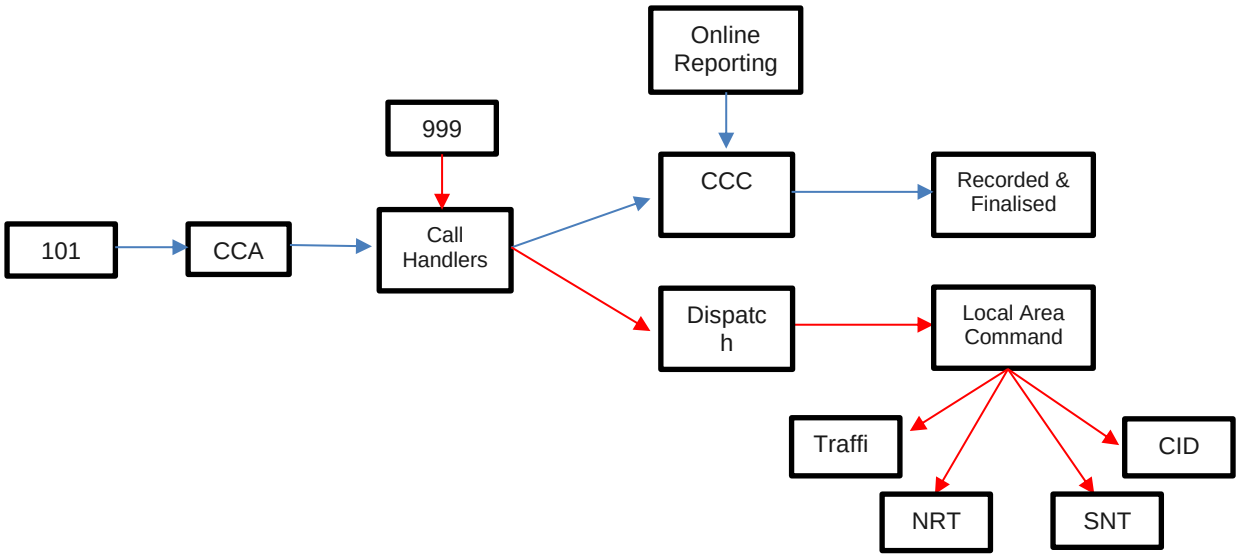



Figure 7.2: Call Triage Process

- **Emergency calls follow the red arrows**: 999 calls go direct to the call handlers where they are assessed. If an immediate response is needed, the call is passed to the dispatch team who then contact and direct the most appropriate operational resources in the area where the emergency is. If a unit is available to respond to the call they are then assigned a Computer Aided Dispatch ('CAD') and dispatched to the address of the incident.

- **Non-emergency calls follow the blue arrows**: 101 calls go first to the Central Call Answering switchboard ('CCA') where they are then assessed and passed to the call handlers. If it is an emergency then the call is passed to dispatch. If it is a call to report an offence or give intelligence, but is not an emergency, then the call is passed to the CCC for recording and finalisation.

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

### Current Resource Capabilities

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

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

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

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

### Existing Demand

7.4.8 In 2019 there were 132,847 non-emergency (101) and 110,448 emergency (999) calls recorded by the Constabulary, equating to 666 calls per day. Over the last five years there has been a 40% increase in the number of 999 calls to the Constabulary with an average annual increase of around 8%.

7.4.9 his is the equivalent ratio of one call to every six people in Suffolk (18%). CCC handle on average approximately 35,000 CAD[20]s per year. This is the equivalent of one CAD for every 22 people in Suffolk[21]. The current caseload of a CCR call handler is 2,010 calls annually. CCC staff handle, on average, 894 cases a year. Appendix F provides a detailed assessment of recent demand for CCR and CCC in Suffolk.

### Forecast Demand from Construction Workforce

7.4.10 With suspect age and gender weightings applied, the expected population increase of non-home-based workers (5,884) at peak would likely see a minimum upsurge in the number of calls by 2,261 at peak – equivalent to the caseload of 1.1 FTE CCR call handlers. At the same time, there would be an anticipated increase of CADs by 322 – equivalent to the caseload of 0.4 FTE CCC staff.

7.4.11 Table 7.5 shows the level of resourcing required within custody management to address the predicted annual average NHB workforce over the anticipated 12-year construction programme. The level of resourcing in terms of FTEs is rounded up to the nearest post if the demand generated meets or exceeds 0.2 FTE.

[20] CAD stands for Computer Aided Dispatch
[21] Or 4.6% of the 2018 estimated population of Suffolk.

Table 7.5: Predicted Average Annual CCR and CCC Demand

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

# 8 Construction Traffic Based Community Safety and Policing Impacts

## 8.1 Overview

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

## 8.2 Baseline Traffic Related CADs

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

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

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

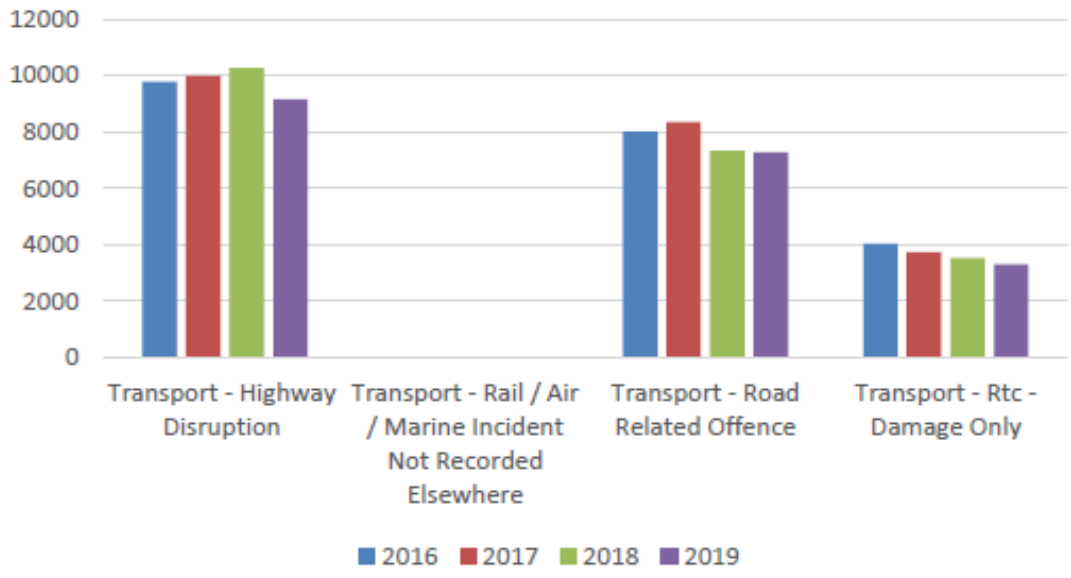



Figure 8.1: Traffic CAD Breakdown (2016 – 2019)

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

## 8.3 Roads Policing Impacts from SZC

### HGV Traffic

8.3.1 Information provided by the Applicant within the submitted SZC DCO application (as updated) and through a response to written clarifications from the Constabulary[22] unfortunately does not confirm whether the proposed cap on HGV movements associated with the construction of SZC (not including the off-site facilities) include AIL movements. Irrespective, the Applicant predicts within its revised evidence that HGV movements at the SZC main development site would be capped at 500 HGVs (250 HGVs in and 250 HGVs out) on a typical day and 700 HGVs (350 HGVs in and 350 HGVs out) on a peak day**.** The Applicant acknowledges that this flow distributed as per the submitted Transport Assessment will generate significant increases in the percentage of HGV traffic on the roads used to access SZC. The percentages are open to interpretation between the Applicant and the Constabulary but the Applicant is currently predicting the range is from 19% on A12 north of Yoxford to 147% on A12 south of Yoxford, prior to the implementation of the SZC Link Road (SLR). At the site access the increase in HGV percentage is 284% in the morning peak period and 647% in the evening peak period.

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

### Road Safety

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

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

8.3.4 To assist with understanding the impact of HGV movements on the access corridors to the SZC project, the Constabulary has obtained personal injury collision statistics relating to HGV involvement from the Department for Transport (DfT) database[23], for the most recent six-year period (1 January 2014 to 31 December 2019).

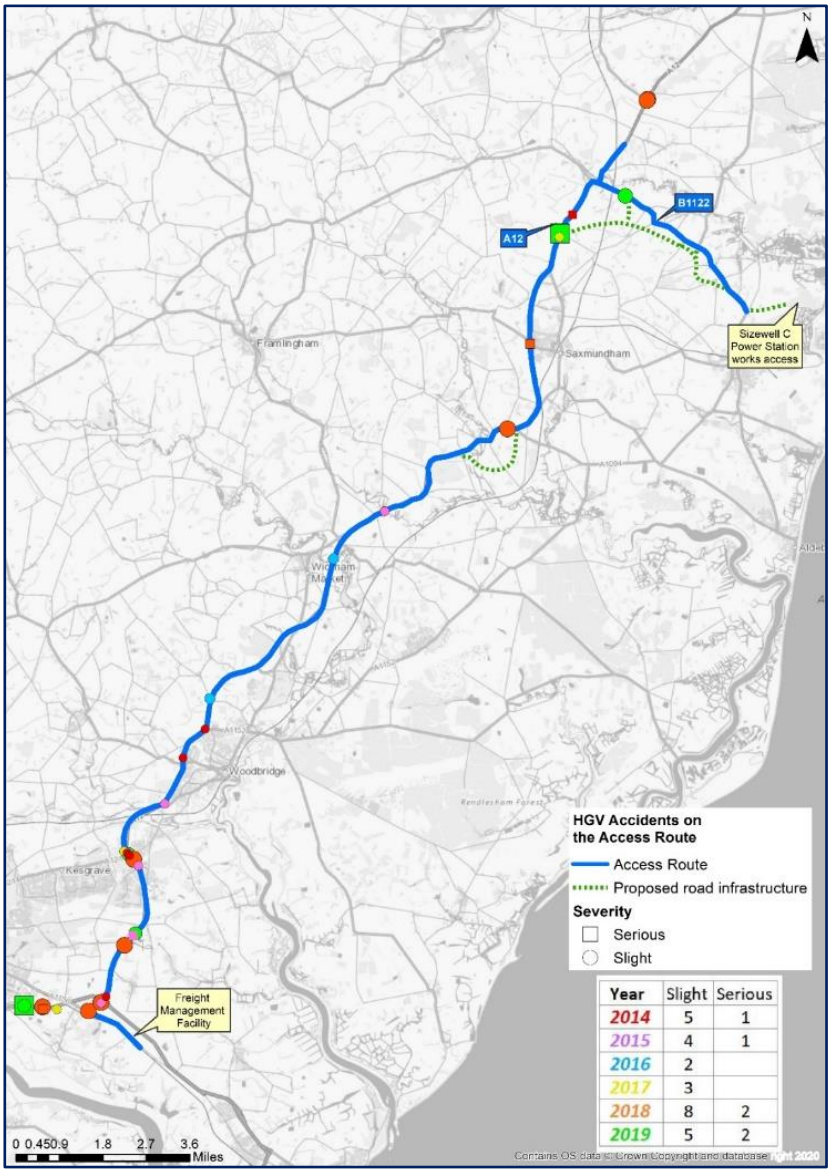



Figure 8.1: Collisions involving HGVs by location, year, and severity

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

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

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

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

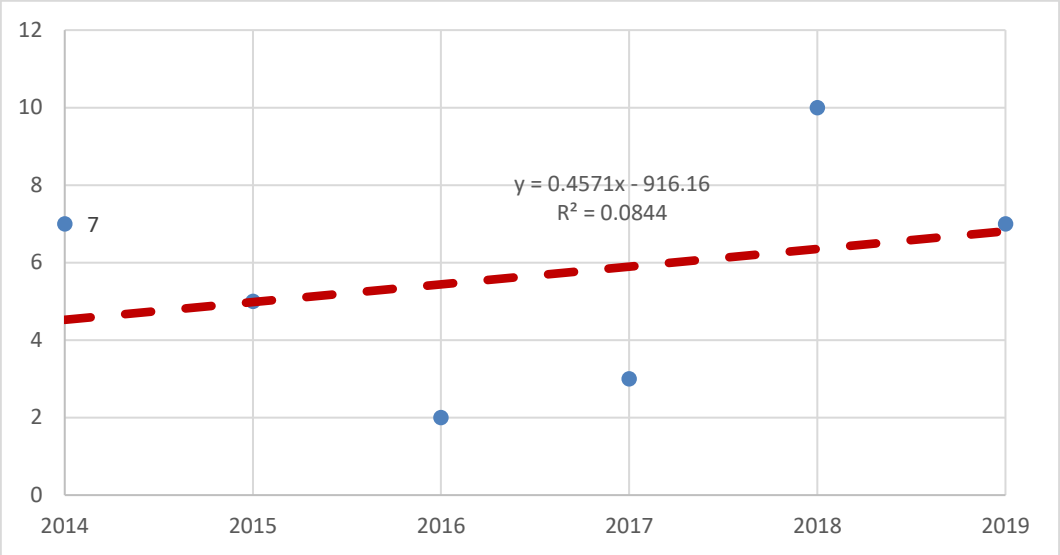



Figure 8.3: Collisions involving HGVs per year and 'fitting line'

8.3.7 The model shows an upward trend predicting 9 and 11 collisions for 2023 and 2028 respectively. This prediction does not take account of the increased number of HGVs and AILs on the network nor the increase in the proportion of HGVs within the total traffic flow that would be generated by SZC and consented developments. If collisions involving HGVs were to rise pro rata with the increase in HGV flow, then the number of incidents per year could treble. However, it is also acknowledged that the projection has not taken into consideration the proposed mitigation measures of the Sizewell Link Road or Two Villages' Bypass intended to reduce the effect of HGVs or AILs movements, albeit it is noted that only two collisions involving HGVs were recorded within the sections of route affected by the mitigation.

8.3.8 A cluster of six collisions involving HGVs was recorded, during the studied period, close to the A12/ A1214 roundabout east of Kesgrave. Of note is a further cluster of four collisions recorded close to or on the A12 / A14 roundabout (Seven Hills Interchange). Finally, three further collisions involving HGVs occurred on the west approach to the A12 / A14 roundabout.

8.3.9 Whilst the Two Villages' Bypass would circumvent challenging sections of the access route and the Sizewell Link Road would minimise the impact of the Project generated traffic in Yoxford, the data indicates that there are points along the corridor that have collision challenges that have not been mitigated and will be heightened by the increase in the number and proportion of HGVs within the traffic flow.

### AIL Movements

### Context

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

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

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

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

### Network Risks

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

**Early years (2023)**

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

**Peak construction (2028)**

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

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

[24] *'The Road Vehicles (Construction and Use) Regulations 1986'*, Source: https://www.legislation.gov.uk/uksi/1986/1078/contents/made
[25] *' The Road Vehicles (Authorised Weight) Regulations 1998'*, Source: https://www.legislation.gov.uk/uksi/1998/3111/contents/made

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

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

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

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

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


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

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

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

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



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

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


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

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

### Emergency Services Response Reliability and Times

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

### AIL Escorting

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

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

8.3.24 The Applicant has previously proposed in its consultation material that all AILs should be escorted by the Police. Conversely the agreed strategy adopted at HPC was for AILs over 4.6m to be escorted. The Applicant has subsequently revised its opinion and is now not proposing that all AILS would be escorted by the Police. The Constabulary's matrix reflects these points and the experience of escorting along the A12 and B1122 such that the Constabulary's position is now to require all AILs over 4.4m to be escorted along the A12 and all AILs over 2.9m along the B1122 during the period of construction of SZC. The Constabulary's welcomes on-going dialogue with the Applicant in order that the appropriate solution for AIL movements, ensuring safety for all road users, can be sought.

8.3.25 The Applicant has provided the Constabulary with AIL data from its project at HPC by way of indication of the anticipated number of AILs for the SZC construction period. That data has been reviewed and assimilated by the Constabulary and indicates that the number of AILs travelling to and from SZC each day can vary with a peak being around 26 AILs in a day. On average the Applicant predicts that there would be around 4-7 AIL movements per day *(EDF paper "Response to Suffolk Constabulary AIL Impact Assessment Report" Table 1.3 and paragraph 1.2.19 – undated but received on 17 May 2021).* These figures are over and above the prediction for non-AIL HGVs associated with the construction phase of SZC and the associated off-site infrastructure.

8.3.26 It is acknowledged that some AILs would not necessarily or typically require escorting from the A14 dual carriageway and on dual carriageway sections of A12. The Constabulary is aware that there are currently no suitable meeting places along the A12 where an AIL convoy could meet a Police escort unit. The Applicant has undertaken to review this position. If a suitable location to meet AILs can be established prior to Woodbridge then it would be possible to reduce the distance over which the Police escort should be required. For AILs travelling south from Lowestoft the strategy would be that escorted vehicles would be met at the port, subject to the Applicant's confirmation of the strategy to move AILs from Lowestoft. Under the co-ordination and guidance of a Police escort, if necessary, two AIL vehicles could travel in convoy along the access route in a single convoy helping to enhance the number of AILs that can access the works. This type of operation is more practicable under Police escort but smaller AILs could also travel in convoy under private escort.

8.3.27 It is the Constabulary's opinion that the existing trained resource and approach to escorting AILs will be unable to cope with the volume and frequency of AIL

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

# 9 Mitigation and Monitoring

## 9.1 Local Policing

### Summary of Resourcing Requirements

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

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

| Construction Year | Local Policing | | Custody | | CCR | | CCC | |
|---|---|---|---|---|---|---|---|---|
| | Incidents | FTEs | Incidents | FTEs | Incidents | FTEs | Incidents | FTEs |
| 1 | 105~~216~~ | 24 | 35 | 1 | 543 | 1 | 78 | 1 |
| 2 | 208~~307~~ | 45 | 53 | 1 | 716 | 1 | 103 | 1 |
| 3 | 415~~487~~ | 78 | 89 | 1 | 1,060 | 1 | 152 | 1 |
| 4 | 585~~638~~ | 910 | 118 | 1 | 1,343 | 1 | 192 | 1 |
| 5 | 840~~860~~ | 13~~14~~ | 163 | 2 | 1,768 | 1 | 252 | 1 |
| 6 | 972~~975~~ | 15~~15~~ | 185 | 2 | 1,986 | 1 | 283 | 1 |
| 7 | 1117~~1,102~~ | 17~~17~~ | 210 | 2 | 2,227 | 2 | 317 | 2 |
| 8 | 915~~925~~ | 14~~15~~ | 175 | 2 | 1,890 | 1 | 269 | 1 |
| 9 | 528~~586~~ | 99 | 108 | 1 | 1,248 | 1 | 178 | 1 |
| 10 | 181~~283~~ | 35 | 48 | 1 | 671 | 1 | 96 | 1 |
| 11 | 117~~226~~ | 24 | 37 | 1 | 565 | 1 | 81 | 1 |
| 12 | 59~~175~~ | 13 | 27 | 1 | 347 | 1 | 67 | 1 |

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

### Police Estate Requirements

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

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

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

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

### Estates Footprint Within Leiston

9.1.6 It is important that any additional estates requirement reflects where the uplift in additional resources is needed, and where practicable those additional officers are within that community and available for their needs when addressing the increase in demand pertaining to SZC during the build programme. **Therefore, the Constabulary will seek an estate footprint within Leiston to maximise the operational effectiveness and efficiency of additional resources funded by the Applicant. This approach will also make it clear to the local community that the additional resources funded through the mitigation provided by the Applicant are indeed there to address net additional community safety risks resulting from the SZC project.**

9.1.7 The provision of the enhanced police estate during the building of SZC will send a clear message to the community that the Constabulary and the Applicant recognise the impact of SZC and are taking proactive steps to ensure that any increase in demand on police services is being addressed, at a local level and that the core uplift in additional police resources will be based within their community.

9.1.8 It is recognised by the Constabulary that any additional estates requirement for the housing of the uplift in police resources required during the building of SZC, will no longer be required once SZC has been built. Therefore, the Constabulary has sought to reflect this through a temporary solution and use of a portacabin solution, the Constabulary will not seek the costlier solution of a permanent build which will be surplus to requirement once the building of SZC has been completed.

9.1.9 A suitable location for a temporary police facility has been identified within the curtilage of the Leiston Sports and Social Club. The rational for this location is that:

- The overt location of the facility will reaffirm the key message that the additional police resources within the community, as a result of mitigation provided through SZC, are there for the community and so located within the community.

- The Sport and Social Club has adequate space and parking to house the premises that will be used by the uplift in SNT and NRT resources, so reducing costs.

- The strategic location provides prime access to the existing and emerging community for the uplift in SNT and NRT officers

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

Table 9.2: Estates Resources Required

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

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

### Estates Footprint Within SZC

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

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

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

### Summary

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

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

### Operational Delivery

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

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

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

### Dedicated Resources for the Leiston SNT

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

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

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

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

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

### Additional Resources for the Neighbourhood Response Team

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

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

### Monitoring

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

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

### Contingency for Additional Potential Community Safety Risks

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

### Summary of Required Local Policing Resources

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

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

Table 9.3: Summary of resourcing strategy

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

## 9.2 Roads Policing

### Resourcing Requirements

9.2.1 Escorting AILs is resource intensive for the Constabulary. The Roads Policing team ('RAPT') is a joint team shared between Suffolk and Norfolk Constabularies. There are currently 141 RAPT officers in Suffolk and Norfolk. Amongst those, 15 (at maximum) are specialist traffic officers trained to escort AILs. Currently, all AILs escorted by police are performed on overtime, which is then charged to the haulier. This approach is only feasible due to the small number of AILs requiring escort as it requires officers occasionally to volunteer to work overtime or give up their rest days, which if they are rescheduled impact the operational number of RAPT officers who can be rostered for normal duties[26].

9.2.2 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The size of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Table 9.4 shows the number of movements that could be escorted depending upon the size of the team.

Table 9.4: AIL Team Resourcing Model

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

9.2.3 Table 9.4 illustrates the AIL movements feasible with different dedicated AIL team models. The AIL team agreed with the Applicant that they will need to consider the number of AIL movements required and the Applicant's acceptance in the delay of these movements if the team is not of an appropriate size.

9.2.4 The Applicant should confirm to the Constabulary when the SZC requirements exceed the data provided, or the Applicant feels that the requirements could potentially be higher than that expressed in the DCO. The size of team will need to allow the Constabulary to resource demand peaks and to provide support to the mitigation required when addressing the additional roads policing cover that will be needed for the additional traffic on the network resulting from the construction of SZC. When officers in the AIL team are not required for escort duties, they will carry out enhanced high visibility patrols, driver, and vehicle safety tests, attend collisions and monitor the vehicles for speeding or

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

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

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

### Proposed Approach

9.2.6 It is the policy of the Constabulary to only move AILs during daylight hours due to the increased risk of moving AILs by night. As such it is proposed that the AIL team works a shift pattern which optimises the number of AIL movements within national policy guidance and that of the Constabulary.

9.2.7 It must be stressed that the size of the AIL team will be driven by data provided by the Applicant. It should also be noted that Police Regulations mean that officer shifts can only be changed with 90 days' notice. Therefore, quality of data provided by the Applicant and effective timely communication are very important. Where the number of AILs requiring movement is above that modelled by the Constabulary, based on the data provided by the Applicant, and the capacity of the dedicated AIL resource will be insufficient to manage this. In this case the movements will be managed through existing roads policing resources and scheduling with all other AIL requirements.

9.2.8 The increased number of AILs and HGVs on the network will require more detailed co-ordination and collaboration with the existing the Abnormal Loads Officer who will continue to manage the "business as usual" movements but with additional pressure on roads management and timings to avoid conflicts. This will require scrutiny of the submissions made with an uplift in quality of submissions and more advanced notice to allow for resource planning and adherence to proposed movement dates.

9.2.9 The co-ordinated system will need to be able to flex to changes in programme or short notice. This could require temporary adjustments in the resources to assist with planning for major movements which might require extra management e.g. at peak periods with high numbers of AILs/day or with extra wide / long loads where more intervention is required.

9.2.10 AIL movements would continue only to be permitted in accordance with the hours set out in the current Policy. The Constabulary would be prepared to review this position subject to further analysis of traffic patterns along the access corridor. This might reflect the demonstration of peak period spreading as a consequence of new commuting patterns or during holiday periods.

9.2.11 The strategy would need to be flexible to adapt to operational challenges that might occur during the life of the construction process. Those operational challenges would be managed through a strengthened and detailed Traffic Incident Management Plan concluded through the DCO process. The plan would need to reflect the use of the FMF and P&R sites and how they would assist with the operation of HGV and AIL traffic during incidents.

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

9.2.13 The Constabulary is also prepared to reflect on the evidence from the operation of the proposed resource schedule and to consider reducing the dedicated resources if it is shown that the project no longer requires that level of resource. The Applicant must understand that replacing that reduced resource would be the subject of further negotiations and suitable funding. That revised position would require mobilisation time.

### Summary

9.2.14 The Constabulary has concluded that the implications of the governance and management of the AILs associated with the construction of the SZC project will require significant dedicated resources and resilience within that resource. That resource will be able to assist the Applicant in the efficient delivery of the Project whilst helping to achieve safe and efficient operation of the affected road network.

9.2.15 As demonstrated through this WR, the escorting of AILs is resource intensive for the police. It means the abstraction of multiple officers from their usual duties or those officers working overtime. Any increase in the number of AILs requiring police escorts will place considerable strain upon the Constabulary resources. Even if costs for staff used are recouped, due to the abstraction of officers and the implications of overtime on work rosters in accordance with the Government's 'Working Time Directive, there is not capacity within RAPT to address the increase in demand from SZC. Failure to resource to the appropriate levels will adversely impact upon the efficient movement of AILs and will affect the safety of the Suffolk road network. In view of the volume of AIL movements pertaining to SZC there is not existing capacity within the Constabulary to manage this demand.

9.2.16 The proposed solution is a dedicated specialist team to manage SZC's AIL requirements. The construct of the team will be predicated on the information provided by the Applicant as to the number and nature of AIL movements. Should the number of AILs exceed the agreed numbers modelled, the Constabulary could not facilitate those movements and those movements could

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

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

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

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

A.1.1 This Policing Impact Assessment (PIA) is underpinned by a model which the Constabulary has developed to predict likely local policing demands and associated resourcing requirements based on non-home based (NHB) workforce data provided by the Applicant and baseline demographic conditions within Suffolk. The Constabulary has engaged with the Applicant over a period of 24 months to develop and refine the PIA.

A.1.2 This appendix outlines refinements made to the model throughout its development to accommodate requests from the Applicant. These include:

- **Resourcing workforce benchmark**: the Constabulary has a long-established practice of undertaking resource planning at the predicted peak requirement of planned events to ensure sufficient police resourcing is in place to address predicted peak community safety impacts.

A.1.3 Following discussions with the Applicant and detailed resource demand modelling using NHB monthly figures (EDF, July 2020), the Constabulary has developed an approach which accommodates the Applicant's request that the annual average NHB workforce is used to calculate impacts. The approach is underpinned by use of the National Police Chiefs Council (NPCC) standard officer cost rate.

- **Recruitment periods:** as a police force which recruits cohorts of officers at the same time, the Constabulary has limited flexibility over recruitment to respond to month-to-month changes in demand arising from the changing NHB workforce. This was originally factored into the model through one recruiting period a year for additional resourcing.

A.1.4 Following discussions with the Applicant, the Constabulary has now modelled two recruitment periods in the year.

- **Whole post resourcing:** related to the above and in accordance with policing regulations, the Constabulary can only recruit new officers in whole FTE increments (i.e., part-time policing is not an option). This has been handled in the model by rounding up FTE officer requirements to the nearest whole post.

A.1.5 Following discussions with the Applicant, the Constabulary has included a threshold of 0.2 FTE where any additional demand below this point will be managed through a separate overtime allowance, rather than be rounded to the next whole FTE. This means that the Constabulary is now only requesting for 1 FTE in circumstances where the resources required are less than 1.2 FTE.

A.1.6 Finally, the model originally included an allowance for additional community safety risks that could occur and, if so, *would* require additional resourcing, in addition to likely significant effects that are predicted and *will* require additional resourcing.

A.1.7 Following discussions with the Applicant, these have been removed from the Constabulary's base model. Monitoring and contingency to mitigate the additional community safety risks should now be provided as necessary through the Applicant's Community Safety / Public Services Resilience Fund rather than upfront resource funding direct to the Constabulary.

A.1.8 This change has been facilitated by refining the structure of the model to predict policing demand and resourcing arising from SZC more accurately, including peak months, which is now based on 6-month average demand.

# Appendix B Comparison Maps

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

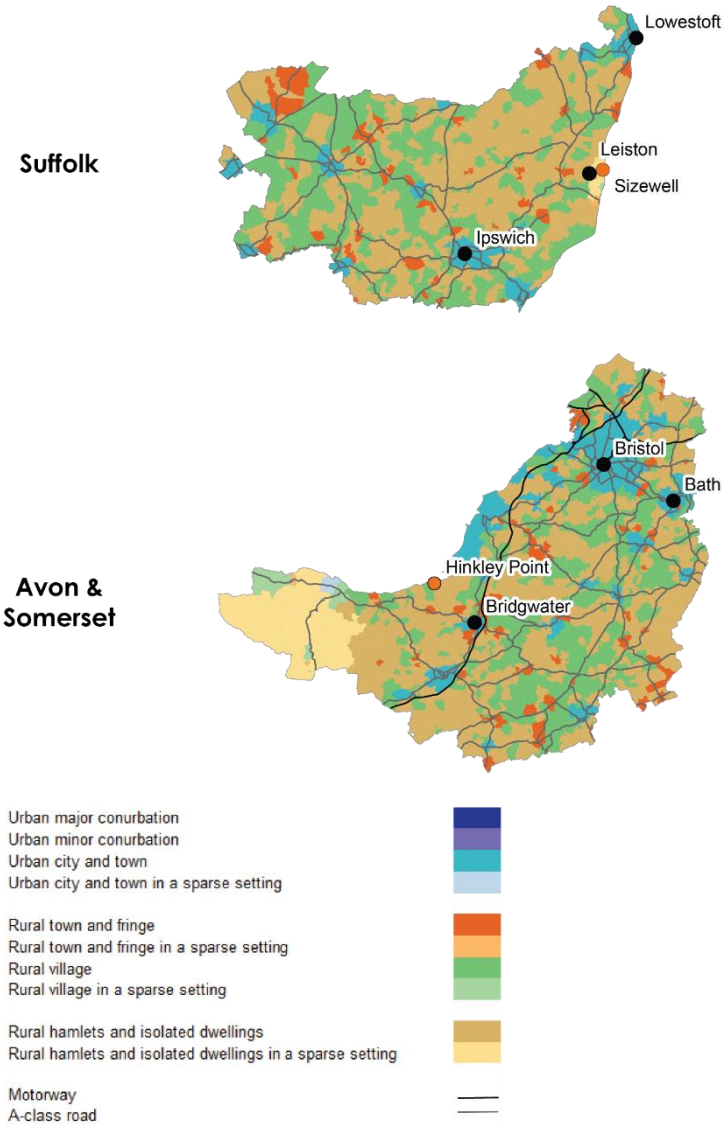



Figure B.1: Comparison Map

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

# Appendix C SEAG Crime Classifications and Resource Allocation

| SEAG Crime Classifications | Initial response (After CCR) | Department Responsible for continued investigation | Examples of where this could affect policing resources outside of SZC Beat Team. |
|---|---|---|---|
| **Criminal Damage** | SNT/NRT | SNT/NRT | Damage caused within the accommodation, site or wider community. |
| **Drugs** | SNT/NRT/Pro-active Team | SNT/NRT/Pro-active Team | Drugs used for recreational use off site, in particular around Night Time Economy (NTE). |
| **Assault** | SNT/NRT | Depends on the level of Injury<br>• Common Assault – SNT/NRT<br>• Actual Bodily Harm – SNT/NRT<br>• Grievous Bodily Harm - CID | Violence used by or directed at workers on and off site, including domestic abuse, NTE and off-site tensions.<br>(A&S had an incident at their campus which involved wider non-funded resources to break up) |
| **DA** | NRT | Depends on the nature of the incident(s)<br>• NRT will investigate the majority of the incidents<br>• CID may investigate the higher risk DA | Suffolk's policy is to take positive action around all DA related matters. Due to the threat and risk DA imposes, NRT would ordinarily be dispatched to attend near on all DA matters. This will include crimes/non-crimes with family and any intermate partners (regardless of the time spent within the relationship). |
| **Harassment** | SNT/NRT | Depends on the level and circumstances of harassment (includes stalking)<br>• SNT/NRT will investigate harassment<br>• SNT/NRT will investigate harassment/stalking (Sec2A) with CID oversight<br>• CID will investigate harassment/stalking (Sec4a). | Any reports of harassment will be taken seriously. Any reports of harassment on site may well be investigated by the SZC team, any off-site reports may well be investigated by other units. Specialist trained officers may well be required to help with complicated electronic related lines of enquiry. |
| **Public Order** | SNT/NRT/CID | SNT/NRT will investigate lower level public Order (Affray, Sec4 and 5)<br>CID will investigate anything more serious (Affray/Violent disorder and Riot) | Public Order incidents can occur anywhere in public, but could be more prevalent in the evenings linked to NTE. Alcohol could be a contributing factor. |

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

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

- Any reported incident to the Constabulary will be assessed within the control room and graded based upon the THRIVE principle (Threat, Harm, Risk, Investigation, Vulnerability, Engagement).

- Any urgent response will require the Neighbourhood Response Team (NRT) to attend. (Grade A and B). The Safer Neighbourhood Team will not normally be asked to attend urgent incidents, unless NRT require support.

- The majority of the crime / non-crime categories within the A&S SEAG returns would require NRT assistance should they be reported in Suffolk.

- There will be various crimes which will be investigated by other specialist departments. The majority of the time, these incidents are first responded to by NRT to mitigate any threat, safeguard the victim and preserve evidence early. Therefore, even though some of the crime will be allocated to the beat team or transferred to specialist units the initial actions are conducted by local policing units.

- The incidents reported into the A&S SEAG show that investment is required within the NRT. The beat team cannot deal with a large proportion of the incoming demand due to staffing numbers, limitation of hours, limitation of skills/knowledge/experience and limitations of the role profile.

- The crime categories used in the A&S SEAG are very general and broad. They do not break the crime category down into subcategories which would then provide the detail to show which department is investigating.

# Appendix D Example of Need for Resources outside HPC Beat Team

D.1.1 One example of both the limitations of relying on automatic tagging to attribute incidents and the need for specialist policing resources to address additional demand arising from HPC outside of the funded HPC 'Beat Team' relates to a recent operation conducted by Avon and Somerset Police to address reports of careless and dangerous driving on the C128 (main route to HPC main development site).

D.1.2 As a result of complaints received by Avon and Somerset Police via different channels (social media/local officers/phone calls) from the local community in and around Cannington, the issue of careless and dangerous driving was identified as a sustained and significant policing issue that required a targeted approach. Due to the volume of complaints received by Avon and Somerset Police, this resulted in the deployment of data capture boxes to support the anecdotal evidence. The complaints and data, having been reviewed by staff who are responsible for generating specific intelligence led taskings, corroborated the issue was of a substantial nature that warranted resource allocation for a targeted approach from policing resources.

D.1.3 Due to the nature of the issue that needed to be addressed, and so specialist training required from officers, the tasking generated was for Roads Policing Units (RPU). Through the RPU targeted action on the C128, two days focused on specific time periods within these days, the following were issued:

- 10 x excess speed fixed penalty notices (highest being 90mph in a 40)
- 5 x double white line overtakes
- 1 x revoked licence
- 12 x notice of intended prosecution (unable to safely stop vehicle, but registration captured)

D.1.4 Whilst the above figures are from the two specific periods targeted by the RPU, it needs to be remembered that in order for this issue to have been tasked targeted in the manner that it was, there had to have been significant activity prior to have warranted the targeting by the RPU team.

D.1.5 The link between this operation and the HPC workforce (as the main perpetrators of the activity targeted on the C128) is evidenced by a strongly worded communication (Figure D.1) released by the Applicant shortly after the RPU operation.

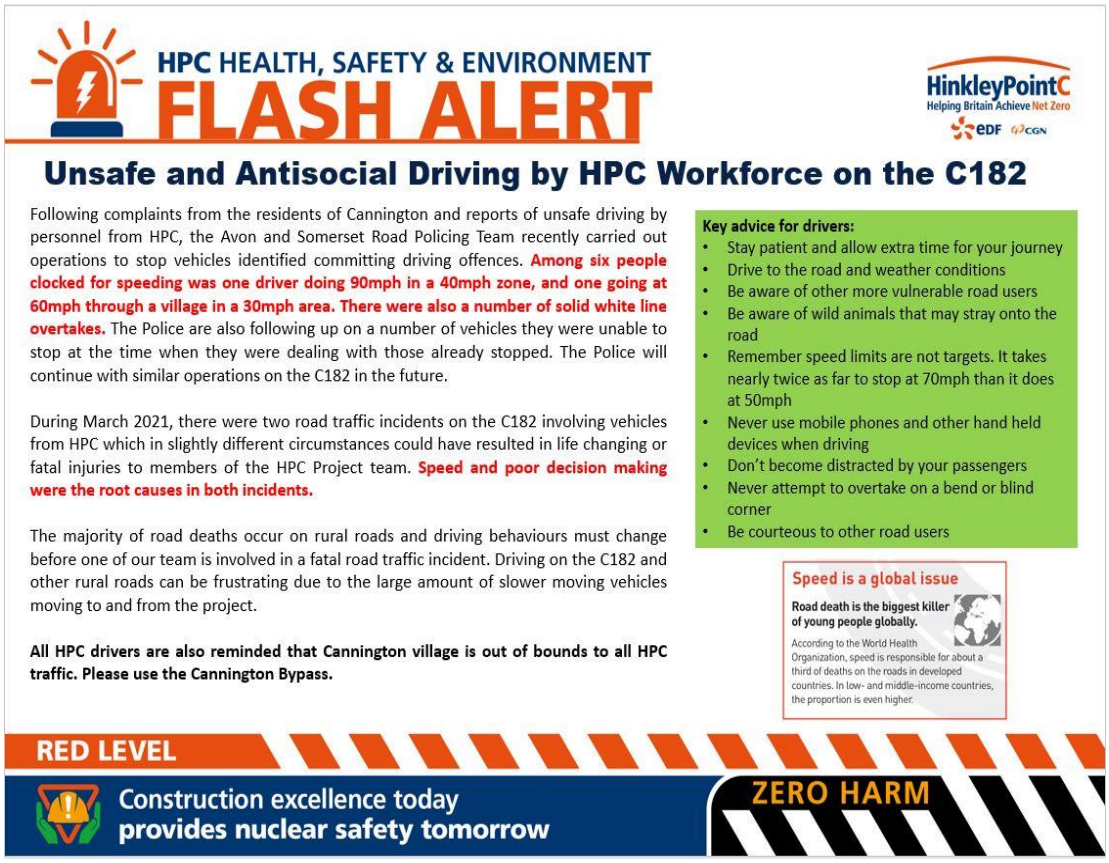



Figure D.1: HPC Communication regarding unsafe driving

D.1.6 The communication warns staff of the consequences if caught, and how the worker code of conduct could be applied, therefore the chances of a person being stopped willingly giving their employment as HPC (knowing the potential implications of doing so, due to the HPC Worker Code of Conduct) is highly unlikely.

D.1.7 Beyond acknowledging that the HPC workforce are key contributors to this issue, the text also identifies two traffic incidents on the C128 involving vehicles from HPC which in slightly different circumstances could have resulted in life changing or fatal injuries.

D.1.8 This example illustrates the Constabulary's position regarding the need for adequate and appropriate police resourcing mitigation, going beyond an on-site Beat Team, and highlights the weaknesses of relying on tagging calls to groups or areas to capture the totality of policing demands arising from HPC.

# Appendix E Literature Review: Factors not Quantified in Crime Modelling

## E.1 Employment Status

E.1.1 Deductive logic may suggest that when unemployment goes up crime is also likely to increase. The idea that unemployment drives crime is a popular one and has its roots in Durkheim's Anomie theory (that poverty leads to disenfranchisement which in turn leads to people rebelling against the law) and Becker's rational choice theory that people commit crime where it is in their benefit to do so. However, modern criminology believes both theories are too simplistic to account for the complexities of real life

E.1.2 Meta-analysis of academic research shows there is currently no consensus in the academic community (both criminological and economics) as to the relationship between crime and unemployment, with considerable debate around causation, correlation, the role of contributing factors and methodological issues with trying to establish the relationship in the first place.[28] For example, Entorf and Sieger's (2014) research in Germany found that while there is some evidence of a correlation between unemployment and certain crime types it is not consistent and is strongly affected by the underlying local crime rate.

E.1.3 Other research has found similarly mixed results. Ha (2019) used regression analysis of crime and unemployment data between 2005 and 2015 of 23 counties in the UK to look at the relationship between crime and unemployment during the financial crisis. She concluded that "*It is difficult to draw strong conclusions regarding the effect of unemployment on crime as there are many issues with data inconsistency, the lack of data available and omitted factors affecting the level of crime rates*" and that what her data showed is that "*unemployment negatively impacts crime rates i.e. an increase in unemployment causes property crime rates to fall or vice versa, thus showing a negative correlation*"[29].

E.1.4 Similarly, Eli Lehrer's (2000)[30] study into crime and the economy showed the historic exceptions that disprove the common assumption that crime and unemployment are linked. Lehrer concluded that removing unemployment from the equation, long term demographic change is the likely reason for a general decline in crime at a national level. Other research has shown most conclusively that crime and age have a strong positive correlation and that men, in particular, tend to 'age' out of crime.

E.1.5 Similarly, a clear link between unemployment and crime would imply a positive corelation between economic downturns and crime rates – yet here too the link

[28] Entorft, H. & Sieger, P. (2014) Does the Link between Unemployment and crime Depend on the Crime Level? A Quantile Regression Approach. Available at: http://ftp.iza.org/dp8334.pdf
[29] Ha, K. (2019) Analyse the Relationship between Unemployment and Crime. Available at: file:///C:/Users/victo/AppData/Local/Temp/Ha-eesj-a18.pdf
[30] Lehrer, E. (2000) Crime and the Economy: what connection? Available at: https://www.heritage.org/crime-and-justice/commentary/crime-and-economy-what-connection

is complex and unclear. While some studies show a positive correlation between recession and increased crime rates[31], others show the opposite. Finklea (2011), for example, found that while there was increase in crime during some recessions there was no consistent relationship between US economic recessions and crime rates as during others they remained relatively stable or even decreased. Similar inconsistencies were reported by Dr Bandyopadhyay[32] and Dr Rosefield (2014).[33]

E.1.6 Meta data analysis shows that there are many factors that affect the relationship between crime and recession, including where and when the recession took place, crime types used in the correlation, the nature of the recession and changes in the way that society lives. This is supported by the findings of the UNODC comparative study[34] which found that in 8 of the 15 countries studied there was a correlation between the economic crisis of 2008/9 and changes in the rate of some crime types. Violent property crime such as robbery were most affected with up to two-fold increases during the recession. Rises in homicides and motor vehicle theft were also observed. This is in line with the 'criminal motivation theory' that suggests economic stress may encourage illicit behaviour. In 7 of the 15 countries, however, no correlation was found.

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

## E.2 Fear of Crime

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

[31] United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)
[32] Bandyopadhyay, S (2018) The Paradox of Falling Crime Rates during a Recession https://www.birmingham.ac.uk/research/perspective/falling-crime-rates-siddhartha-bandyopadhyay-2.aspx
[33] Rosefield, R (2014), Crime and the great Recession. Journal of Contemporary Criminal Justice, Vol. 30 (I) 4-6
[34] United Nations Office on Drugs and Crime (2011) Monitoring the Impact of Economic Crisis on Crime, UNODC Statistics and Surveys Section (SASS)
[35] Mikula, M (2020) Will the COVID-19-related economic recession cause a spike in crime?

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

E.2.2 A study by University College London conducted in 2017 found that when individuals that never suffer crime only interact with people from their own group, they feel secure. However, only a small amount of interactions between groups is enough to change their perceptions of security. For instance, when 5% of the interactions occur with people from another group, the model predicts that more than 50% of the individuals who never suffer crime will fear it. Interestingly, the study showed that a decrease in crime rates has almost no effect on the perception of security. The researchers concluded that the perception that a region is secure is very unstable. It takes only a small amount of crime to create a generalised fear in the population, and crime rates need to decrease considerably and over an extended period to improve the average perception that a region is secure[37].

E.2.3 This is supported by research conducted by Professor Innes (2005)[38]. Innes (2005) argues that some events in the life of a social collective exert considerable influence because of how their presence is interpreted as denoting the potential for other similar or more serious problems to occur in the future. This sense that certain incidents exert a disproportionate impact upon public beliefs and attitudes when compared with their 'objective' consequences, is pivotal in understanding how and why social groups respond in certain ways to dangerous people, places and events. These events are typically called 'signal events' or 'signal crimes'. A signal crime can be understood as "a conventional sign, which, by prearrangement, has been arbitrarily established for this purpose – the purpose of announcing that there is something about which to be alarmed" (Goffman, 1972 cited in Innes 2005). Warr's (1994) research shows that people are disproportionately fearful of crimes such as rape, robbery and burglary compared to the risk of them actually happening. Even moderate increases in the perceived risk of violent victimization have the potential to increase fear enormously[39].

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

[36] Prieto Curiel, R., Bishop, S.R. Fear of crime: the impact of different distributions of victimisation. *Palgrave Commun* **4,** 46 (2018). https://doi.org/10.1057/s41599-018-0094-8
[37] https://www.ucl.ac.uk/news/2017/jul/fear-crime-contagious-even-low-crime-communities
[38] Innes, M (2005), 'Why Disorder Matters? Antisocial Behaviour and Incivility as Signals of Risk'. SCARR Conference January 2005. Available at: https://www.kent.ac.uk/scarr/events/finalpapers/Innes.pdf
[39] Warr, M. (1994) Public Perceptions and Reactions to Violent Offending and Victimisation. In National Research Council *Understanding and Preventing Violence, Volume 4: Consequences and Control*. Washington, DC: The National Academies Press. https://doi.org/10.17226/4422.

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

# Appendix F Existing Demand for Police Services

## F.1 Local Policing

### Criminal Investigations

***Suffolk***

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

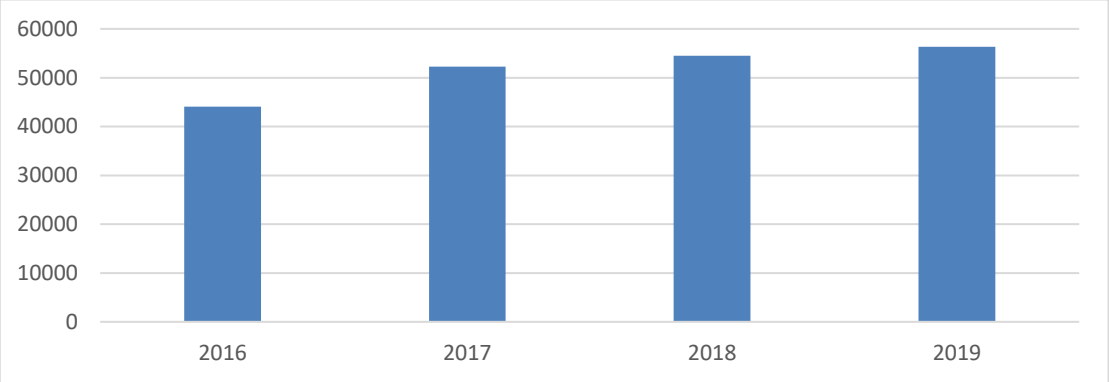



Figure F.1: Recorded Crime Investigations 2016 - 19

F.1.2 This increase is largely due to a rise in the number of public order offences, sexual offences and violent crimes recorded. Between 2017 and 2018 there was a 31% increase in Robbery, 20% rise in Possession of Weapons, 14% increase in Violence against the Person and 12% increase in Public Order and Sexual Offences. The apparent increase is consistent with the national trend identified by the ONS (2018) and is expected to continue growing[40].

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

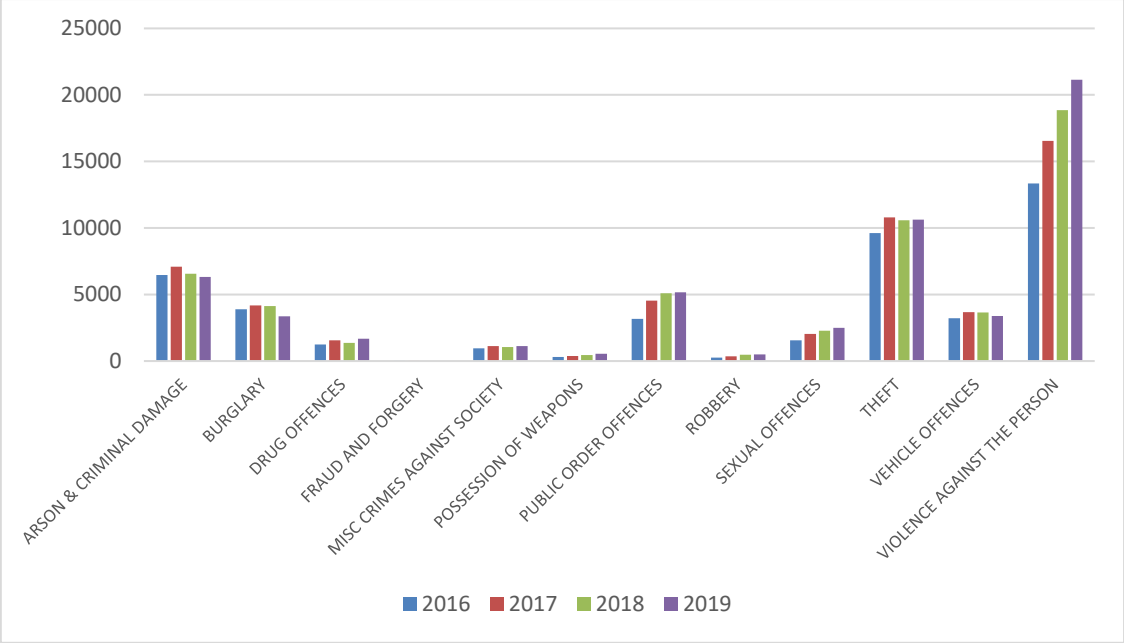



Figure F.2: Demand by Crime Type

F.1.3 Increases in recorded crime place more demand on limited resources. The crime type will also have a bearing on the likely period of the investigation; For example, sexual offences take longer to investigate and involve multiple departments (CID, SNT, SIU and SARC) whereas a theft from shop is less resource intensive and is usually resolved by the initial attending officer.

F.1.4 As Figure F.2 above shows, certain offence groups occur more frequently than others. Violence against the person accounted for a significant proportion (38%) of the total number of criminal investigations during 2019. Offences ranged from common assault to GBH. The suspect profile for VWI offences is predominantly male and between the ages of 18 – 55[41].

F.1.5 There is an important distinction between the frequency of offences and level of harm caused by certain offences. Sexual offences, for example, are far less frequent than theft or vehicular offences and yet the harm caused to both the victim and wider society is much greater. Any increase in high harm categories then, has a much greater impact both on society and the police in terms of long-term resource allocation.

F.1.6 As Figure F.3 below shows, the increase noted in Figure F.2 is part of a long-term trend and is consistent with the national picture[42]. Based on current projections, reported crime will continue to increase.

[41] https://www.croydon.gov.uk/sites/default/files/Strategic%20Assessment%202019.pdf
[42] ONS (2018) https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice

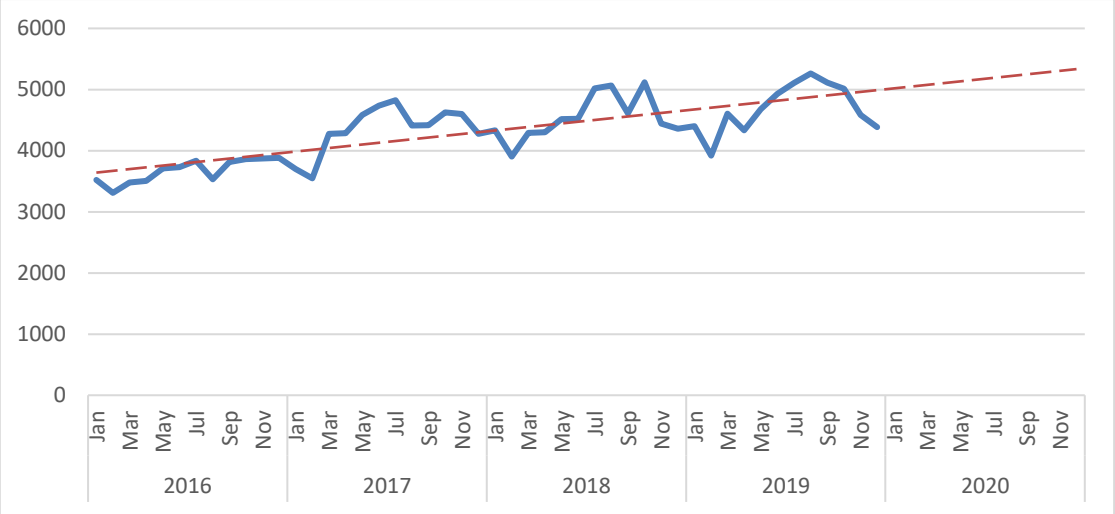



Figure F.3: Five Year Crime Trend

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

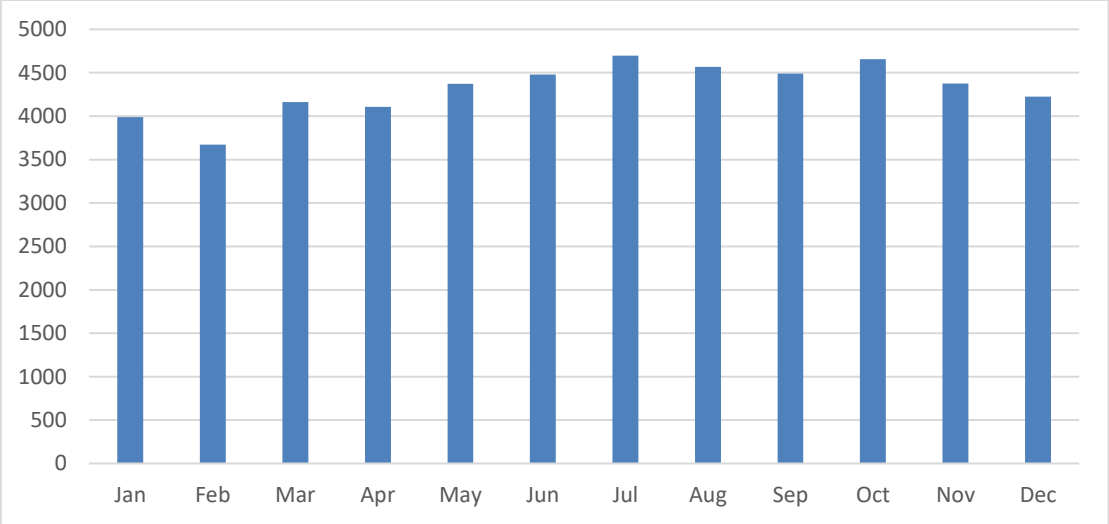



Figure F.4: Seasonal Variation Three Year Average (2016/19)

F.1.8 Demand on policing can come from a number of different areas: from reports of crime, to proactive operations and to education and prevention advice and activities, to name but a few. Police resourcing (i.e. staffing) is allocated based on the identification of demand trends.

F.1.9 Overall demand on police resources is relatively stable across the week although there is a noticeable difference in the type of demand. Peak demand for when crime is committed is over the weekend period (Friday – Sunday), which is consistent with the CCR data. The peak time for reporting crimes is mid-week (Tuesday/Wednesday) with a significant decrease in reporting over the weekend. This is due to the delay in when people report crimes to the police (Figure F.5).

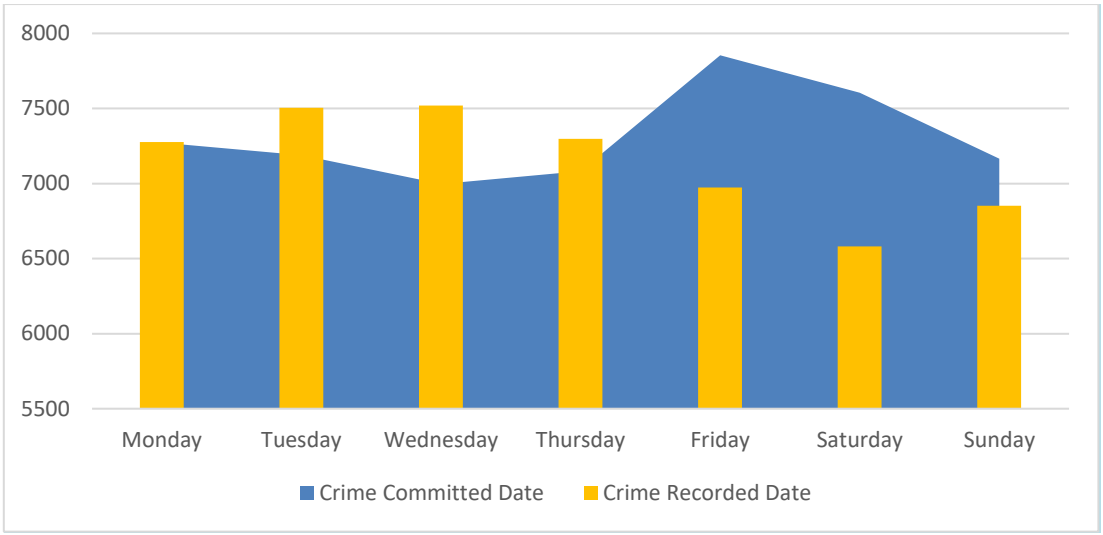



Figure F.5: Demand by Day Three Year Average (2016/18)

***East Police Area***

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

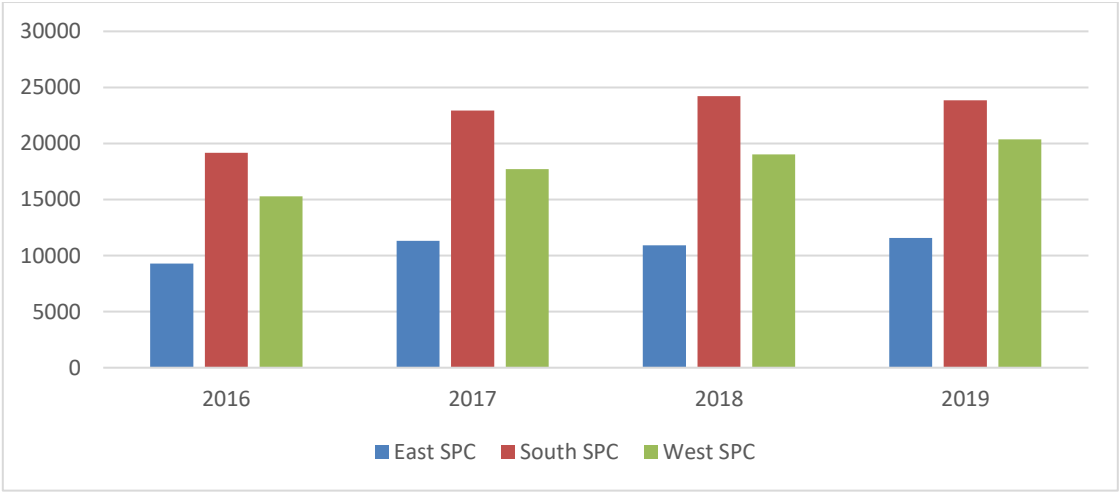



Figure F.6: Demand by Police District

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

in the West or South but the proportion of VWI offences is greater in comparison to the size of population and overall number of crimes reported[43].

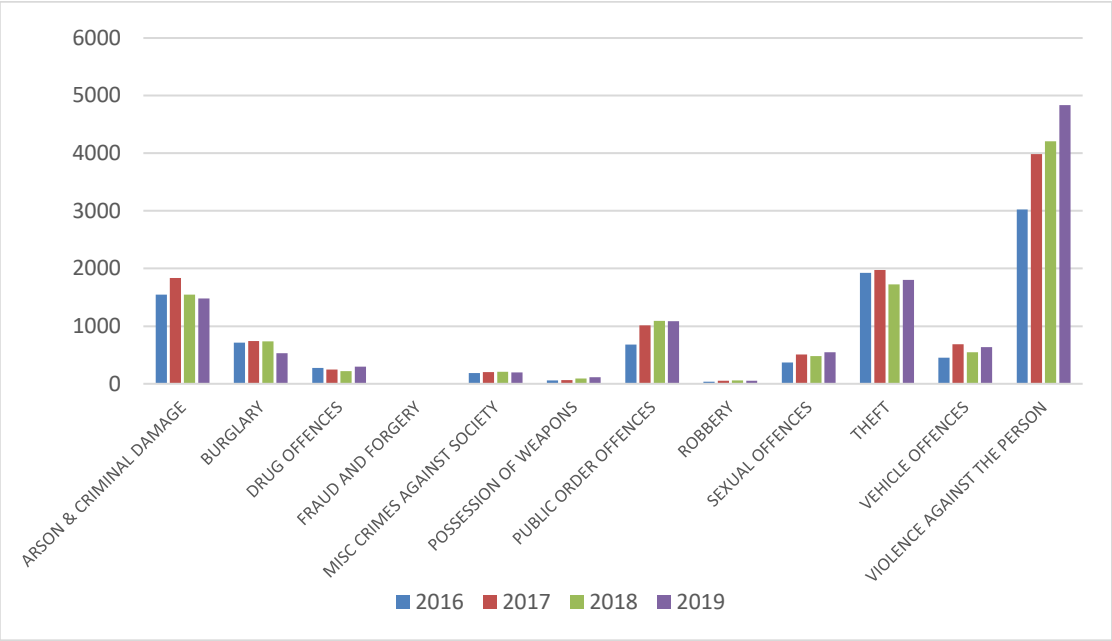



Figure F.7: East SPC Crime Investigation Breakdown

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

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

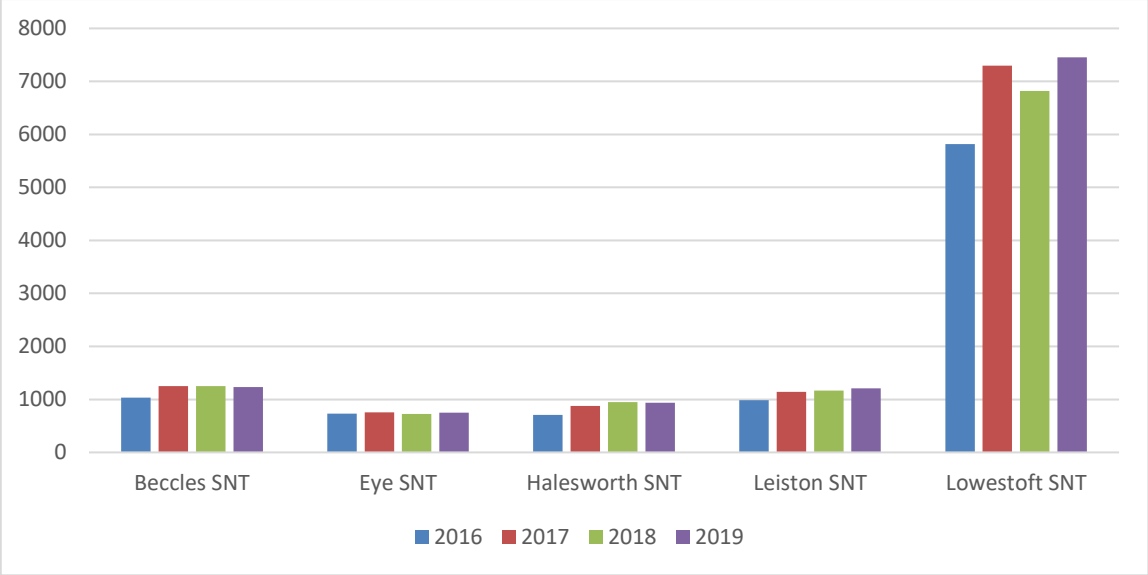



Figure F.8: Criminal Investigation by East SNT

## Non-Crime Investigations

***Suffolk***

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

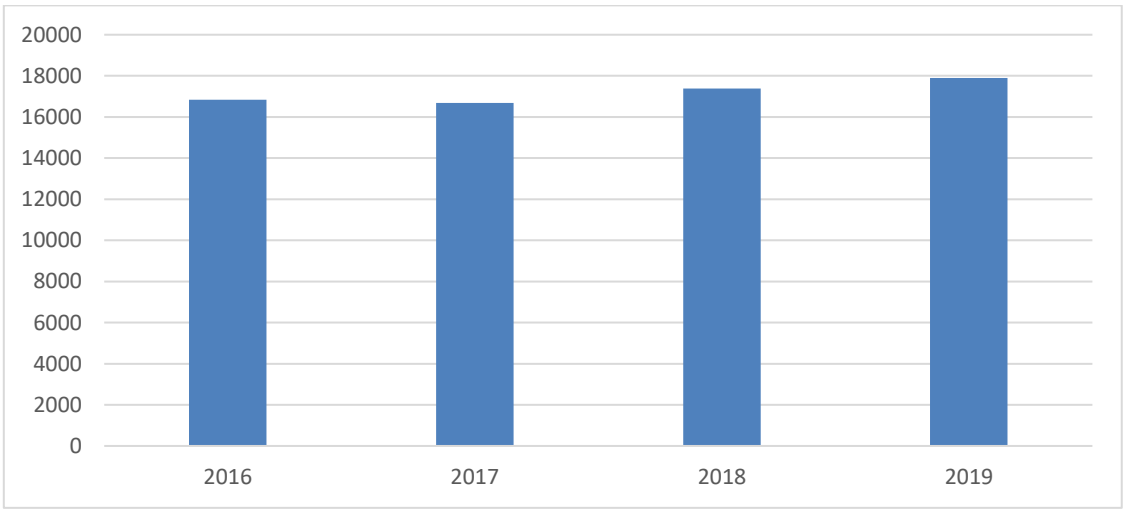



Figure F.9: Non-Crime Investigations Recorded in Suffolk

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

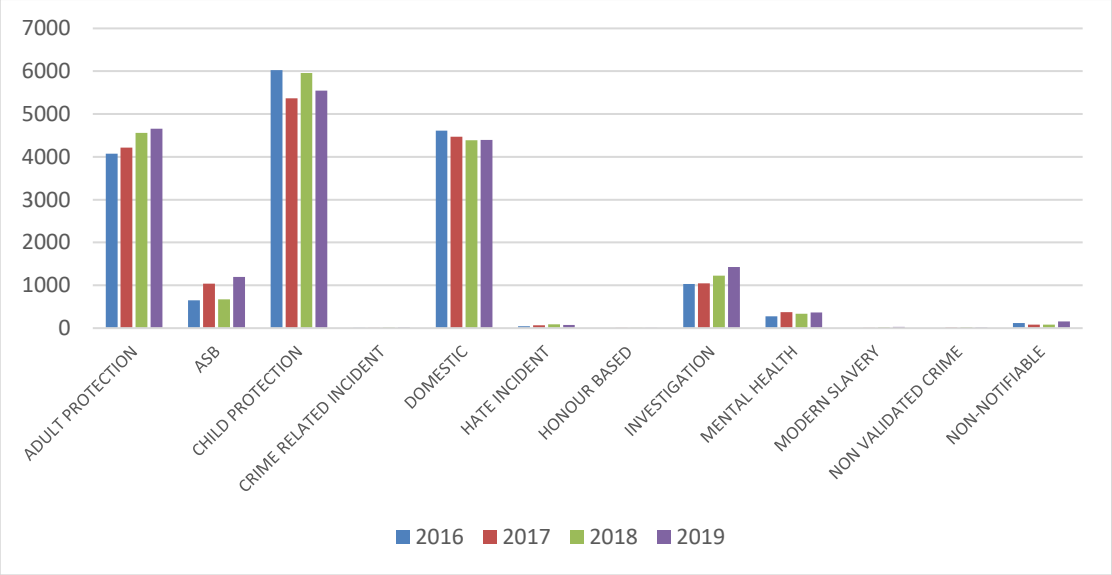



Figure F.10: Demand by Investigation Type

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

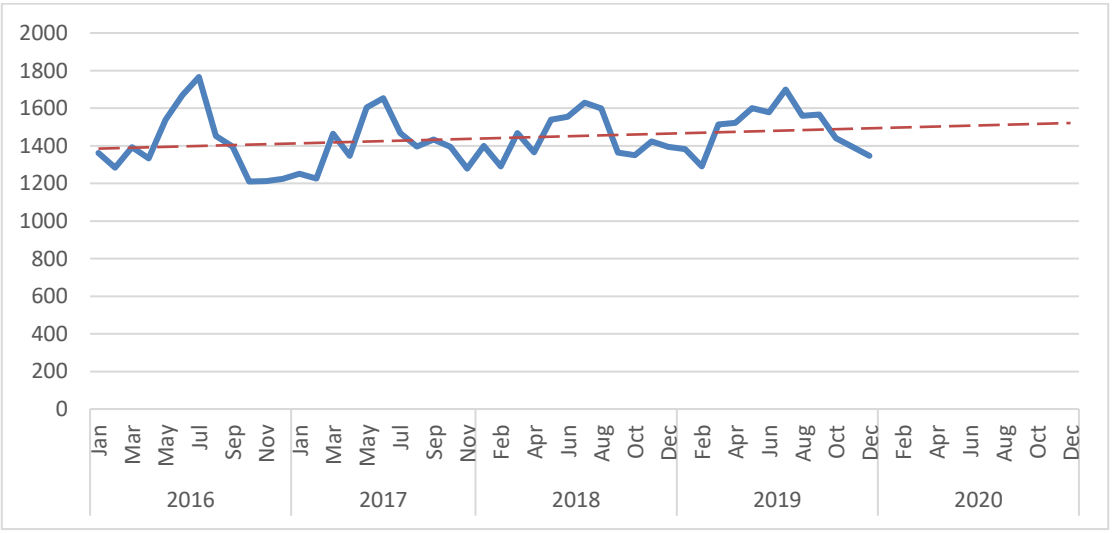



Figure F.11: 5 Year Non-Crime Trend

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

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

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

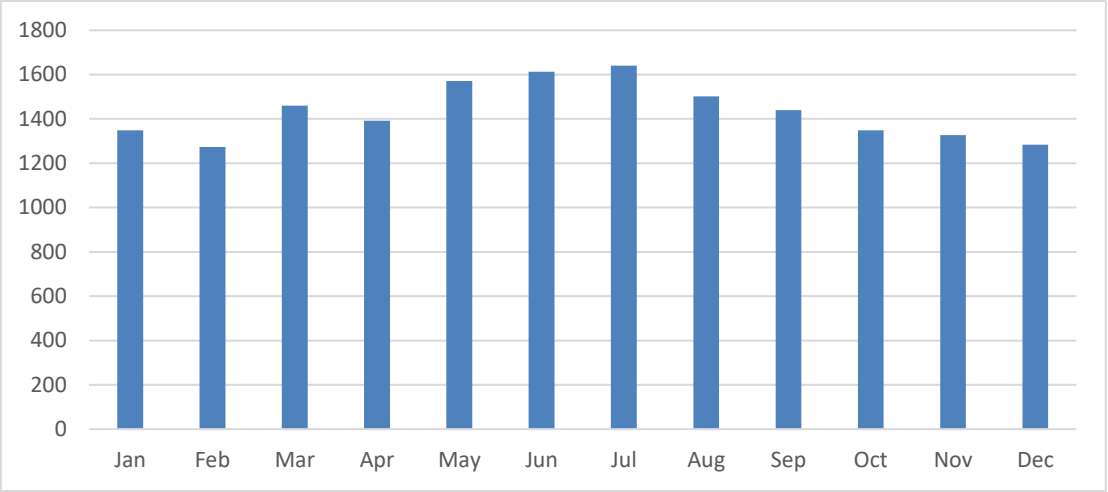



Figure F.12: Seasonal Variation (2016 - 2019)

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

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

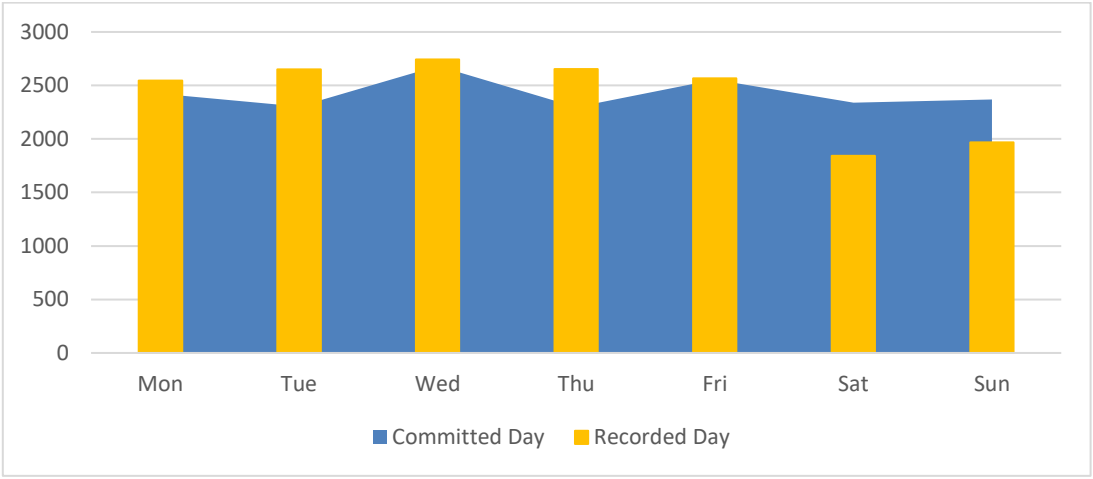



Figure F.13: Demand by Day Three Year Average (2016/18)

***East Police Area***

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

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

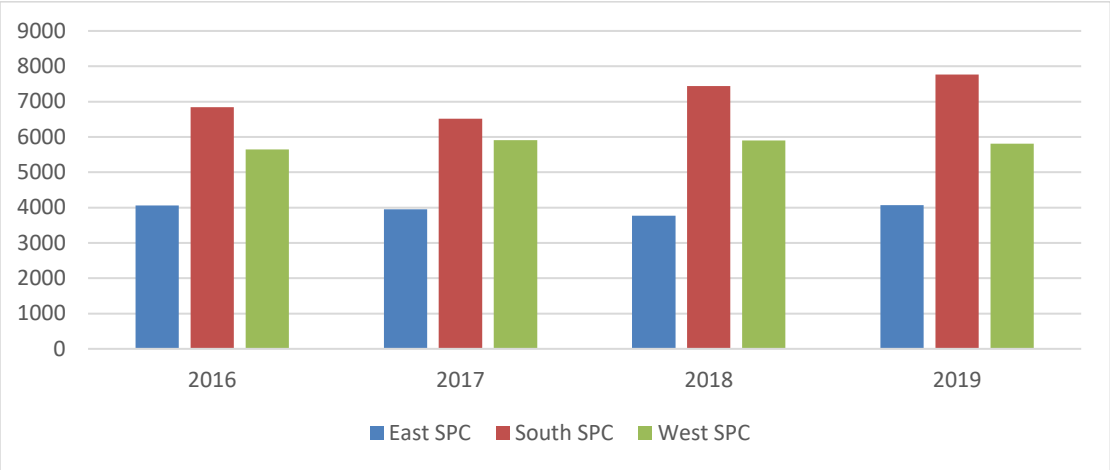



Figure F.14: Non-Crime Demand by Police District

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

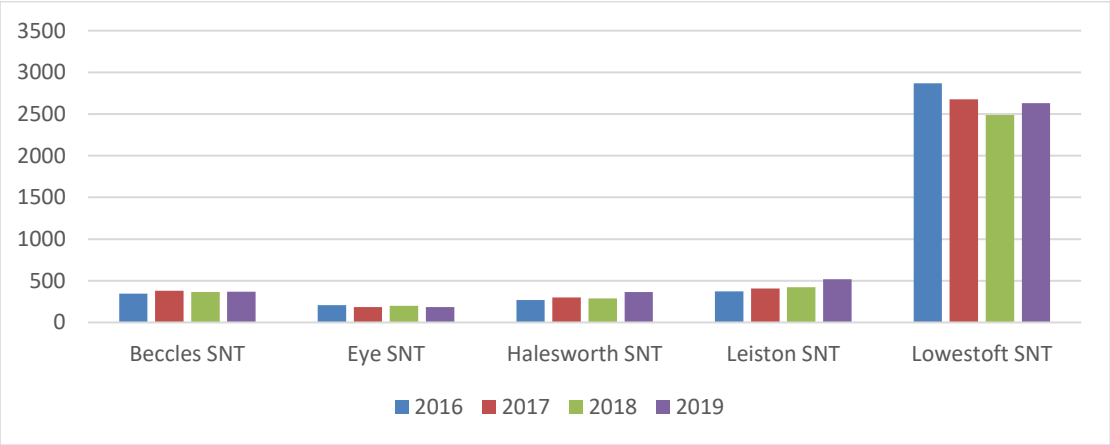



Figure F.15: Non-Crime Investigations by East SNT

## Additional Demands on Local Policing

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

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

### *Mental Health Calls*

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

F.1.27 A recent report by the College of Policing estimated that around 20% of police time in the UK involves a mental health concern and that this percentage is increasing year on year[44]. Research suggests it costs police approximately £522 to respond to a mental health incident with costs increasing if the individual is detained under S.136[45].

F.1.28 In addition to this an HM Inspectorate of Constabulary inspection in 2013 found that it was common for officers to spend up to 8 hours in incidents involving detentions under the Mental Health Act[46]. This represents a considerable proportion of that officer's shift time and can have further consequence on resourcing if it occurs towards the end of that officer's shift – resulting in either another officer diverting to take over care or over time being paid to the original officer to stay past the end of their shift. It should also be noted that it is the Constabulary's policy that individuals detained under S.135 or a S.136 are escorted by a minimum of two officers in order to safeguard the wellbeing of both the individual and the officers. More than two officers can be required if the individual is violent or judged to be high risk. This can have a serious impact

[44] College of Policing (2015) Estimating Demand on the Police Service
[45] Heslin, M; Callaghan, L; Barrett, B; Lea, S; Eick, S; Morgan, J; Bolt, M; Thornicroft, G; Healey, A; and Patel A. (2017) Costs of the police service and mental healthcare pathways experienced by individuals with enduring mental health needs. The British Journal of Psychiatry, Feb 210 (2): 157 - 164
[46] HMIC (2013) A Criminal Use of Police Cells? The use of police custody as a place of safety for people with mental health needs.

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

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

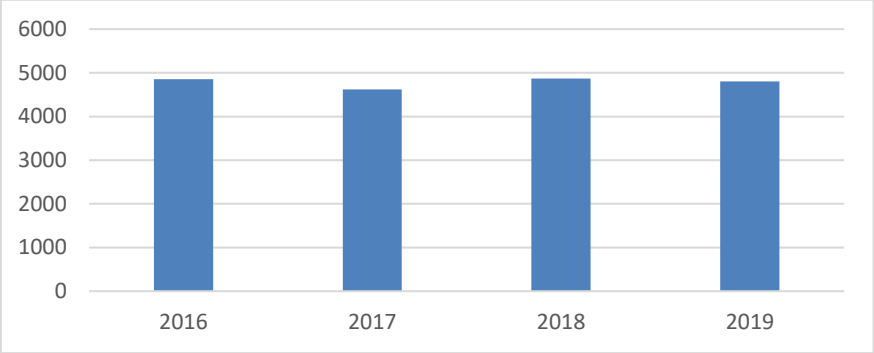



Figure F.16: Number of Mental Health CADs

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

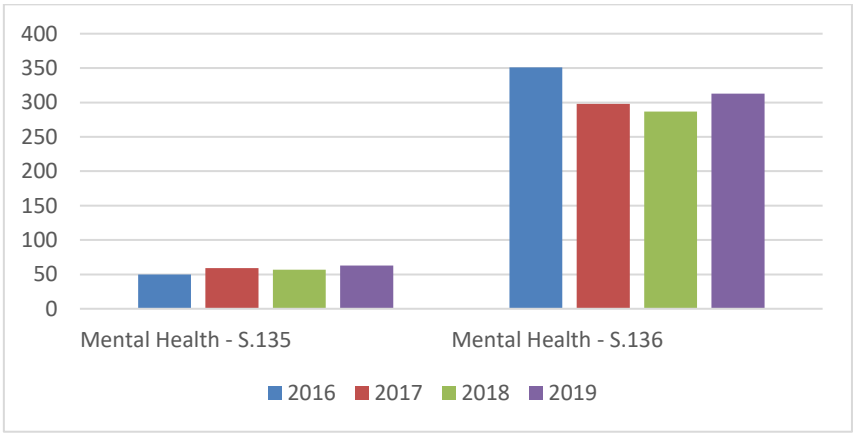



Figure F.17: Police Attended Mental Health Call

F.1.31 Studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average[47]. It is further recognised that the

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

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

***Suicides***

F.1.32 There were 67 verdicts of suicide recorded in Suffolk in 2018, up from 61 in 2017. The majority of these involved young males[48].

F.1.33 Analysis by the ONS found that 75% of suicides involved men and that males between 45 – 49 had the highest age specific suicide rate (27.1 deaths per 100,000)[49]. The report concluded that suicide is now the leading cause of death for men aged 15 – 49. Studies show that the majority of those who either take their own life, or attempt to, were in contact with a health professional within 12 months before their death[50]. As with mental health, NHB workers do not have their natural support network of friends and family and are therefore more susceptible to the pressures that can lead to suicide as the opportunity to talk and confide in others is not as readily available.

F.1.34 Other studies have highlighted the link between construction work and higher rates of suicide; with male skilled construction workers being three times more likely to commit suicide than the national average[51]. The ONS also report that of the 13,232 in-work suicides recorded between 2011 and 2015 the construction industry accounted for 13.2% of suicides despite only accounting for 7% of employment in the UK[52].

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

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

[48] https://www.eadt.co.uk/news/survivors-of-suicide-in-suffolk-speak-1-6264772
[49] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations
[50] https://www.btp.police.uk/pdf/From%20Crisis%20to%20Care%20Website%20Final%20Aug%202016.pdf
[51] Burke, L (2019) Workplace Mental Health in the Construction Industry. http://constructorscompany.org.uk/wp-content/uploads/2019/05/Mental-Health-In-Construction-May-2019.pdf
[52] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations

F.1.37 A study by Knapp, McDaid and Parsonage (2011) estimated that the average cost of suicide was £1,450,000 per case in 2009; with the majority of the cost incurred around disruption to businesses from road and service closures[53]. Deaths occurring on or near major transport links (such as major roads and railways) can result in the closure of that road or train line for several hours resulting in considerable delays and volume pressure on less suitable roads, which can in turn result in more accidents. ONS data shows that suicide is currently increasing. In 2018 there were 6,507 verdicts of suicide recorded in England, equating to 11.2 deaths per 100,000 population and an increase of 11.8% from 2017[54].

***Missing Person Investigations***

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

F.1.39 In 2013 a study of UK police forces estimated that the average cost of a medium risk, medium length missing person investigation was around £2,415 for the investigating police force[55]. This amount is approximately three times the cost of investigating a robbery and four times more than burglaries[56].

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

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

[53] Knapp, M. McDaid, M. and Parsonage, M (eds) (2011) Mental Health Promotion and Mental Illness Prevention: The Economic Case. PSSRU. KSE and Political Science.
[54] https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/suicidesintheunitedkingdom/2018registrations
[55] Greene, K. and Pakes, F. (2013) The Cost of Missing Person Investigations: Implications for current Debates. Oxford University Press.
[56] UK Missing Persons Bureau
[57] Data obtained from COMPACT download

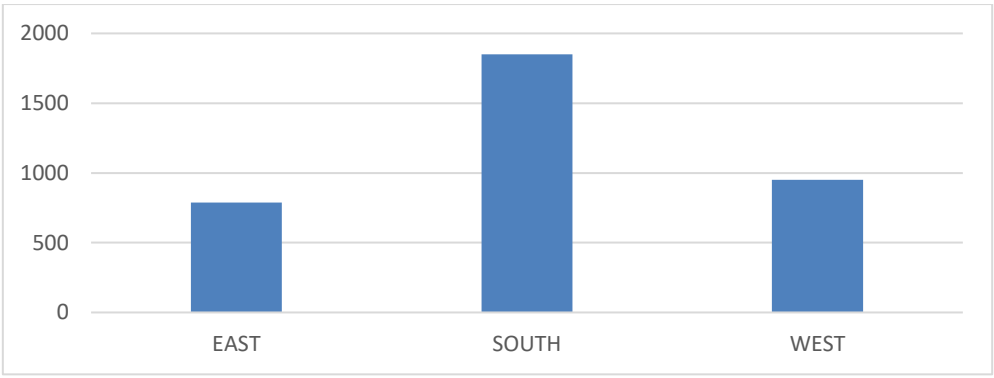



Figure F.18: No. of Missing Person Cases in 2019

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

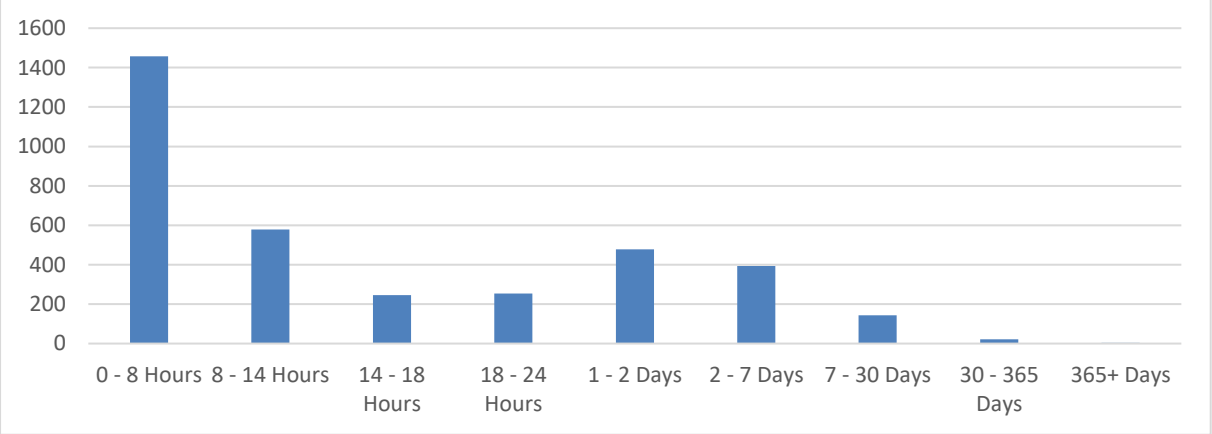



Figure F.19: Average Time Missing

F.1.43 In 2014/15 the Constabulary had the third highest number of high-risk missing person reports of all police forces in England[58]. The majority of investigations in 2019 involved medium or high-risk reports (Figure F.20) with 177 accounts of serious harm to the missing person recorded (Figure F.21). Where an offence had been committed either by or against the missing person this results in a separate criminal investigation that is independent of the missing person investigation. 26% (1021) of missing person reports relate to individuals between the age of 18 and 60 (Figure F.22)[59].

[58] UK Missing Person Bureau https://missingpersons.police.uk/en-gb/resources/research/geographies-of-missing
[59] For the purposes of the SC assessment, only cases involving missing people between 18 and 60 have been used in the predictive demand modelling.

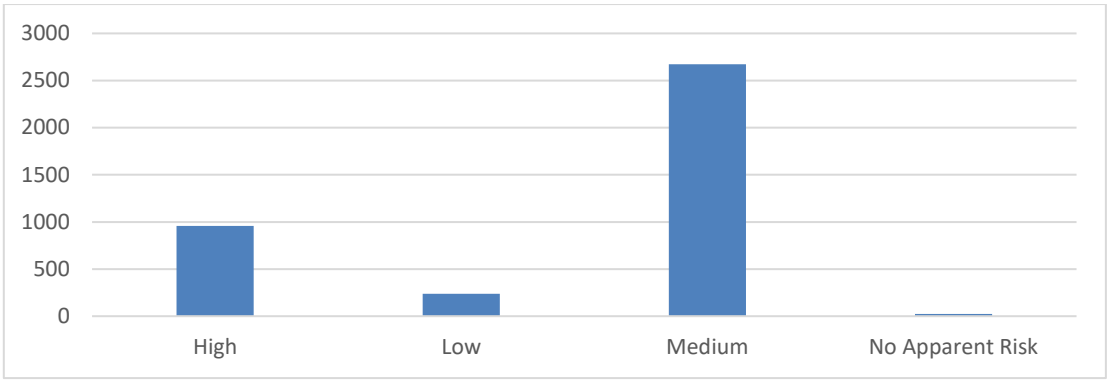



Figure F.20: Missing Person Cases by Risk (2019)

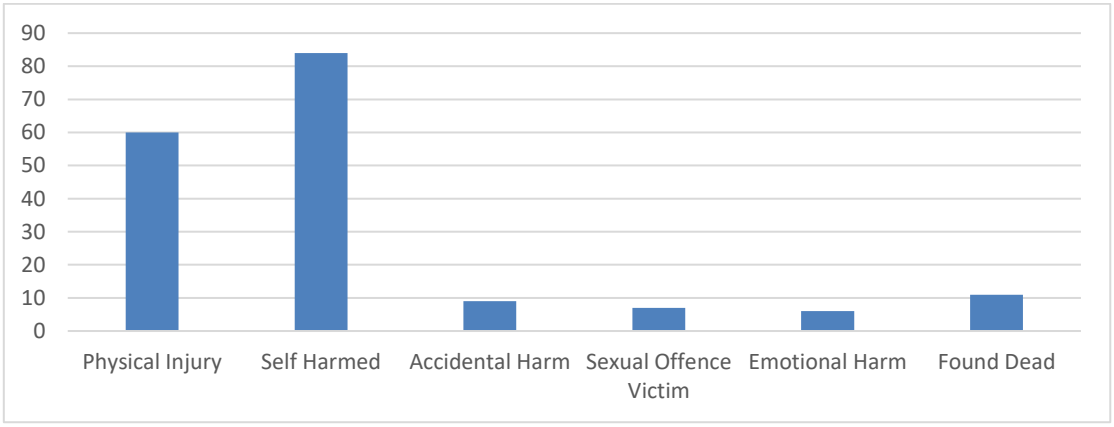



Figure F.21: Harm Reported to Missing Person

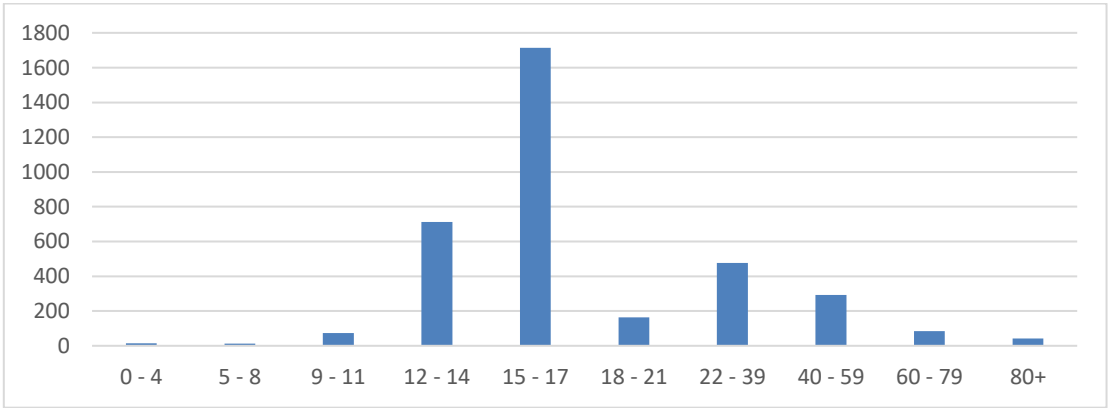



Figure F.22: MPI by Age Group

F.1.44 A recent review by the College of Policing (2015) estimated that 18 hours of police time is required per medium risk missing person investigation[60]. In 2019 there were 2,674 medium risk missing person investigations recorded in Suffolk. Based on the College of Policing calculations this would equate to 51,264 police manhours being devoted to a medium risk missing person investigation and therefore unable to perform or response or other community policing duties[61].

[60] College of Policing (2015) Estimating Demand on the Police Service
[61] This number excludes all subsequent investigations that might result from a missing person investigation (i.e. where a crime has been committed).

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

***Community Tensions***

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

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

## F.2 Custody

### Overview

9.2.19 In 2019 there were 10,758 detentions in Suffolk[62]. This represents an increase of 9% between 2016 - 2019 (see Figure F.23).

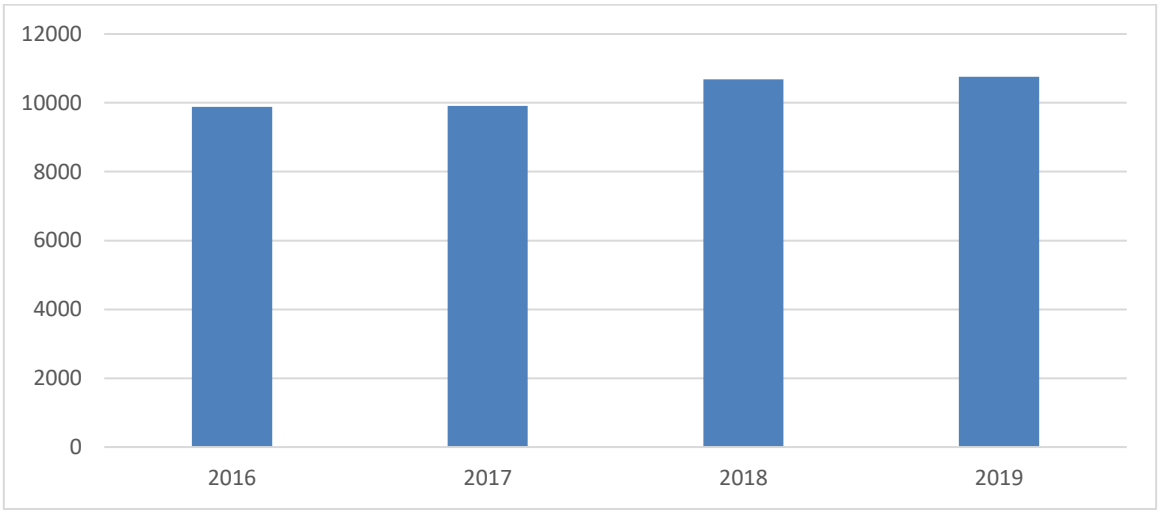



Figure F.23: Suffolk Constabulary Arrests by Year

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

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

identified national trends[63] and is likely to continue to rise over the next few years as the Linear Trend Line indicates (Figure F.24).

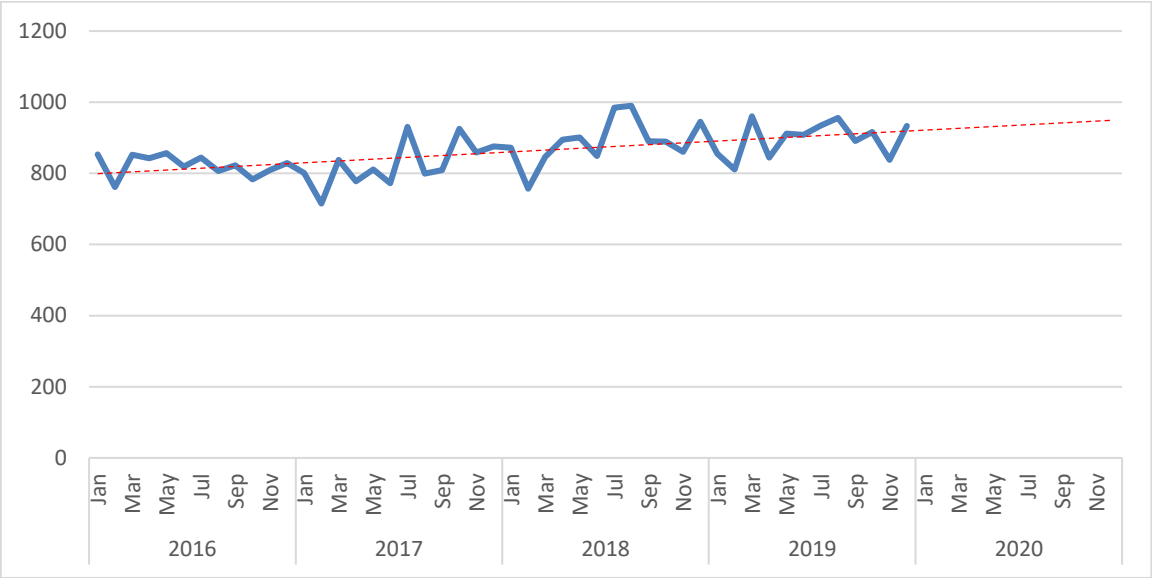



Figure F.24: Arrest Numbers by Month

F.2.2 A key factor driving the rise in detentions is an increase in Higher Levels of Arrestable Offences: ONS data from 2018 shows that while nationally crime numbers remain relatively stable, there has been a significant rise in the number of serious and resource intensive crimes being reported to police forces. ONS data for July 2017 – June 2018[64] shows a significant rise in Public Order Offences (+30%) and Robbery (+22%), with increases also recorded for Sexual Offences, Acquisitive Crimes and Violence involving a weapon.

F.2.3 The types of offenses articulated above are those that the core demographic of the SZC workforce, predominantly male between 20 and 49, are likely to be victims or perpetrators of[65]. An increase in these offences will lead to a corresponding increase in arrests, and due to the type and severity of the offences will require a corresponding increase in resource allocation to manage them.

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

[63] ONS (2018) https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice
[64] Crime in England and Wales: Year ending June 2018 available at: https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingjune2018#latest-figures
[65] https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/thenatureofviolentcrimeinenglandandwales/yearendingmarch2018

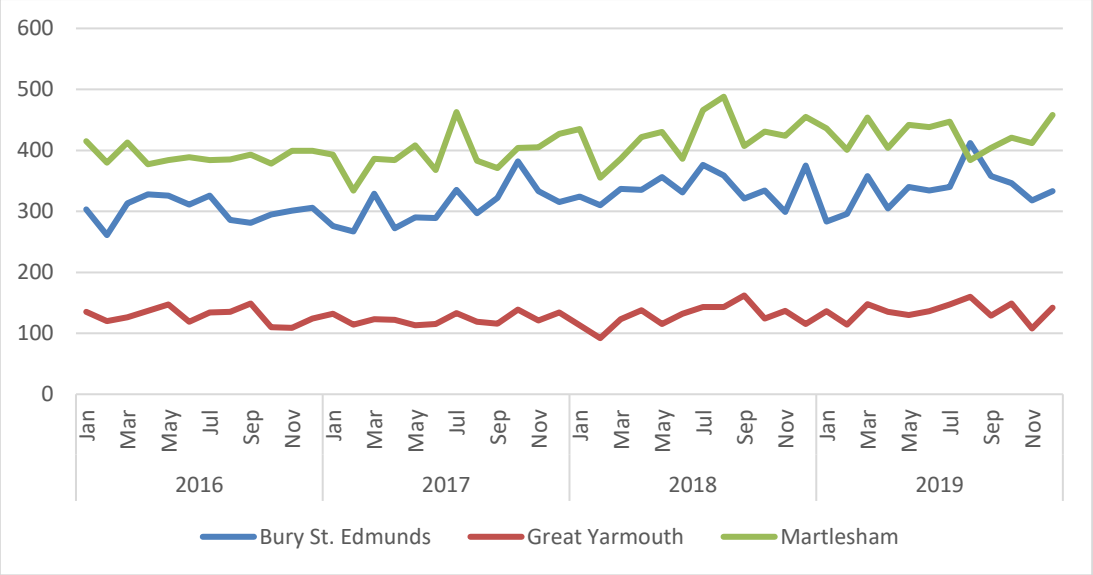



Figure F.25: Demand by PIC

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

### Disaggregation of Arrest Data

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

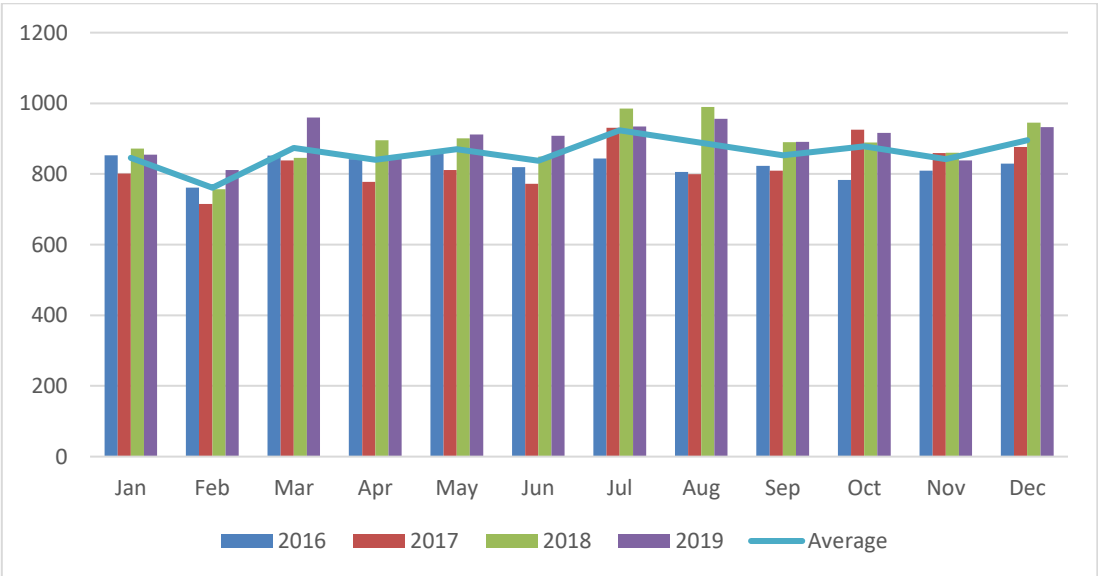



Figure F.26: Arrests by Month

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

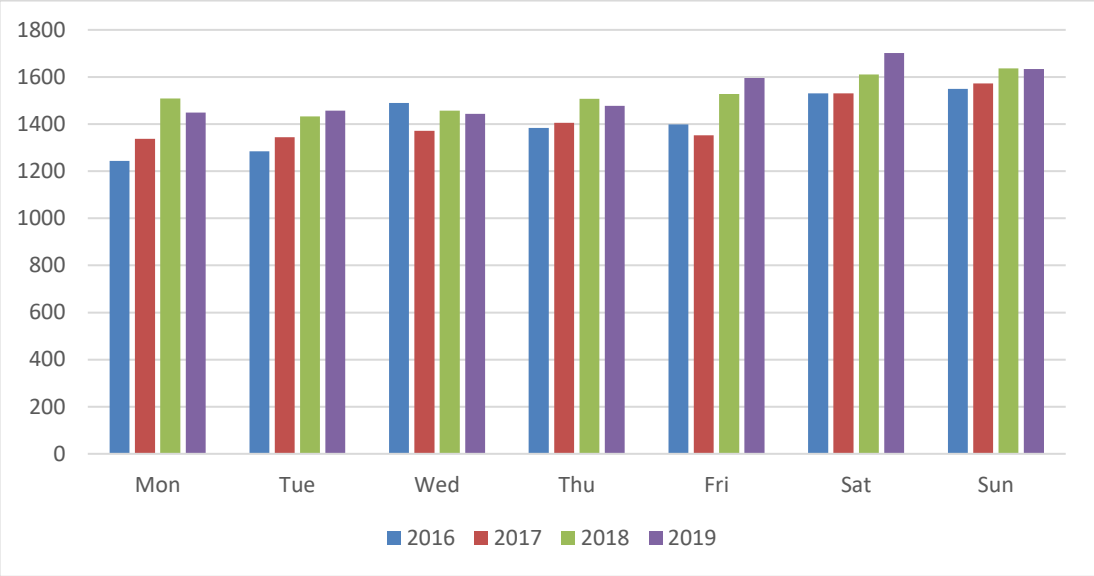



Figure F.27: Arrests by Day of the Week

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

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

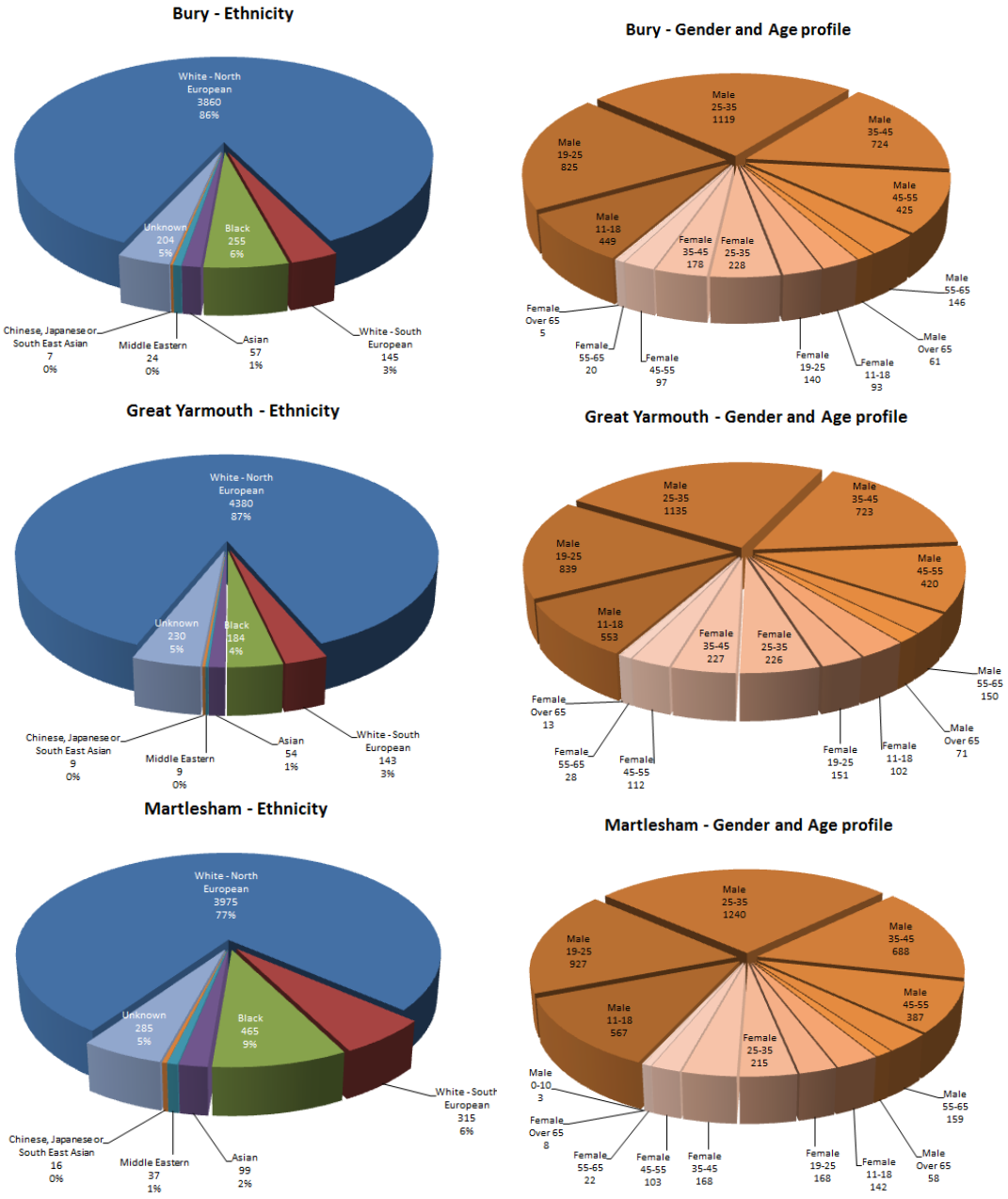



Figure F.28: Demographic breakdown

## F.3 CCR

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

### Emergency - 999 Calls

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

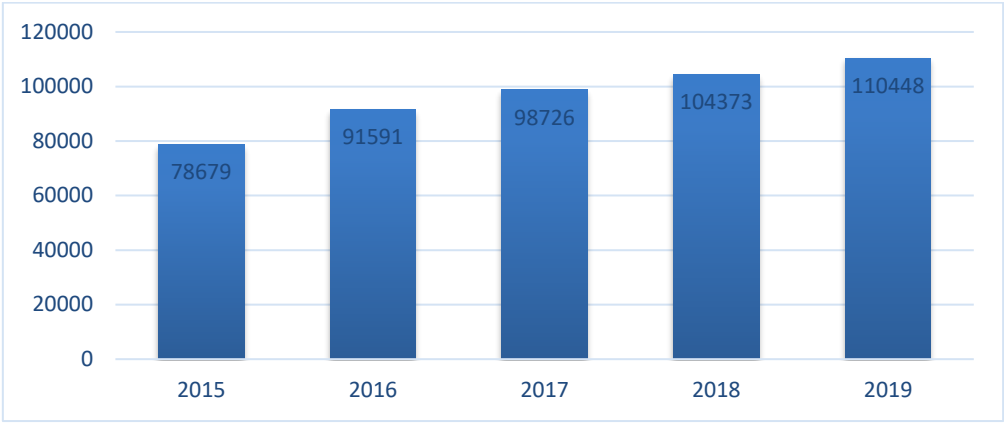



Figure F.29: 999 Calls 2015 - 2019

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

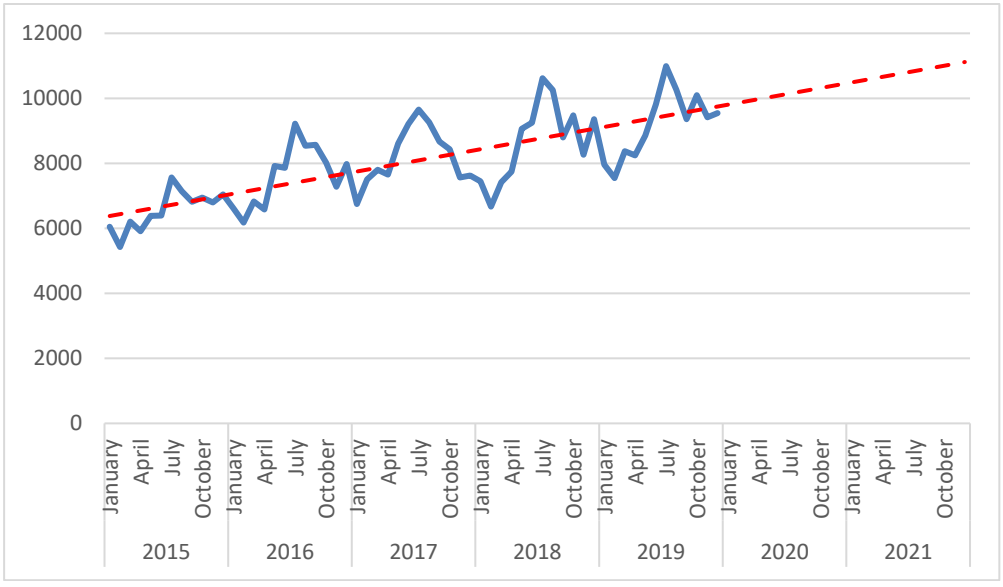



Figure F.30: 999 Call Trend

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

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

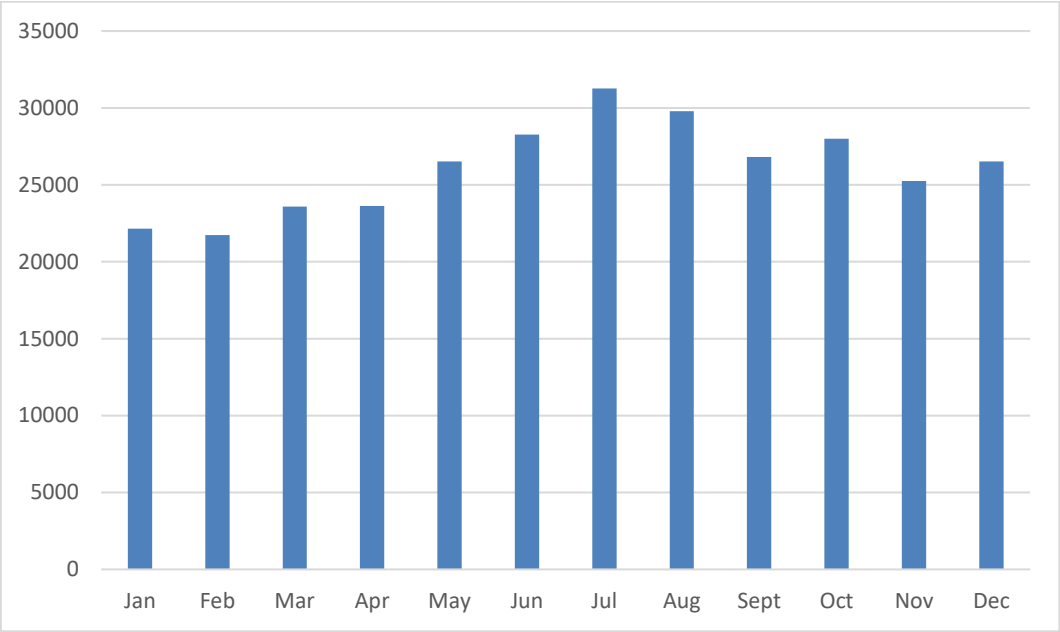



Figure F.31: 999 Seasonal Variation (Three Year Average 2017 - 2019)

F.3.5 999 call numbers are relatively steady throughout the week with slight increase in activity on Friday and Saturday (see Figure F.32). This is consistent with the pattern of demand in Custody[66].

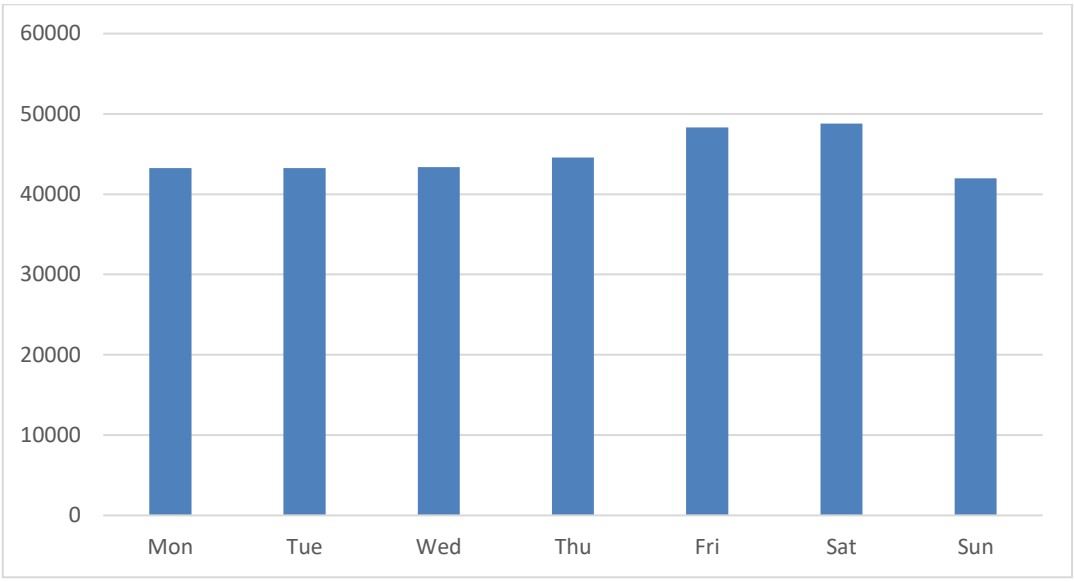



Figure F.32: 999 Calls by Day of the Week (Three Year Average 2017 - 2019)

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

### Non-Emergency - 101 Calls

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

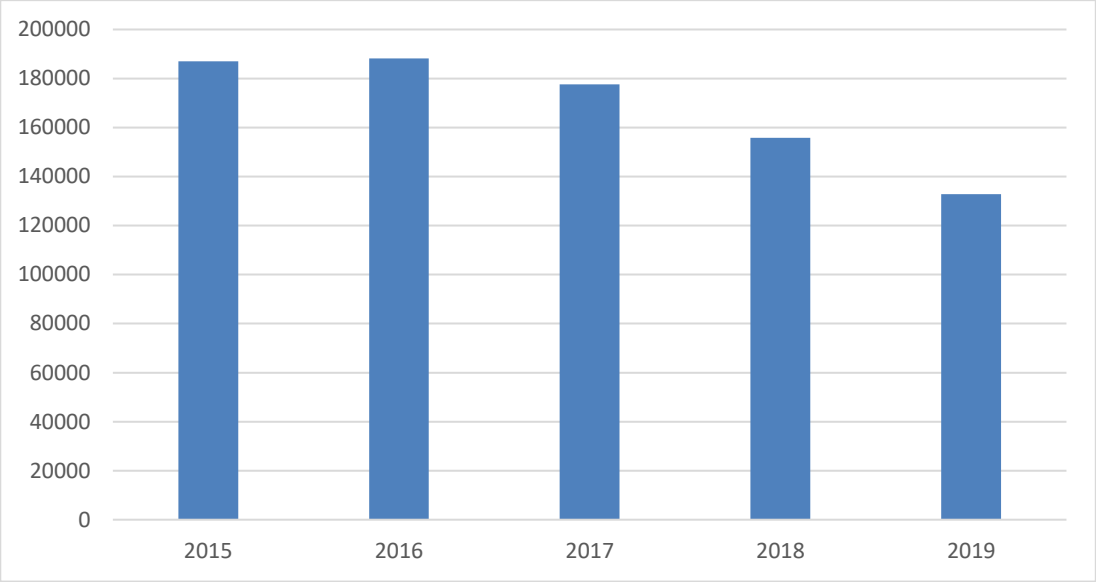



Figure F.33: 101 Calls 2015 - 2019

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

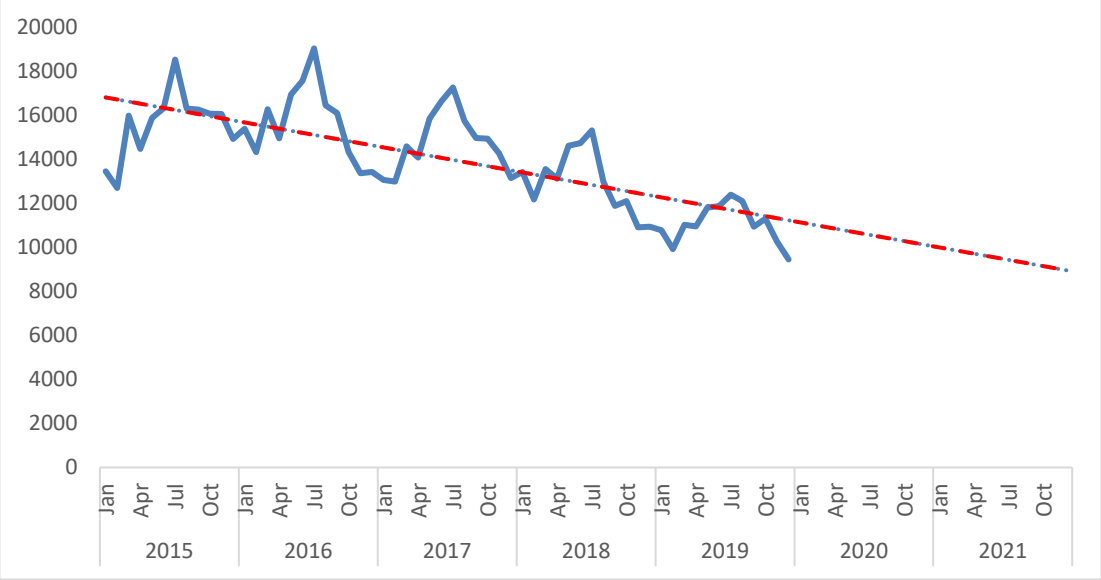



Figure F.34: 101 Call Trend

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

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

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

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

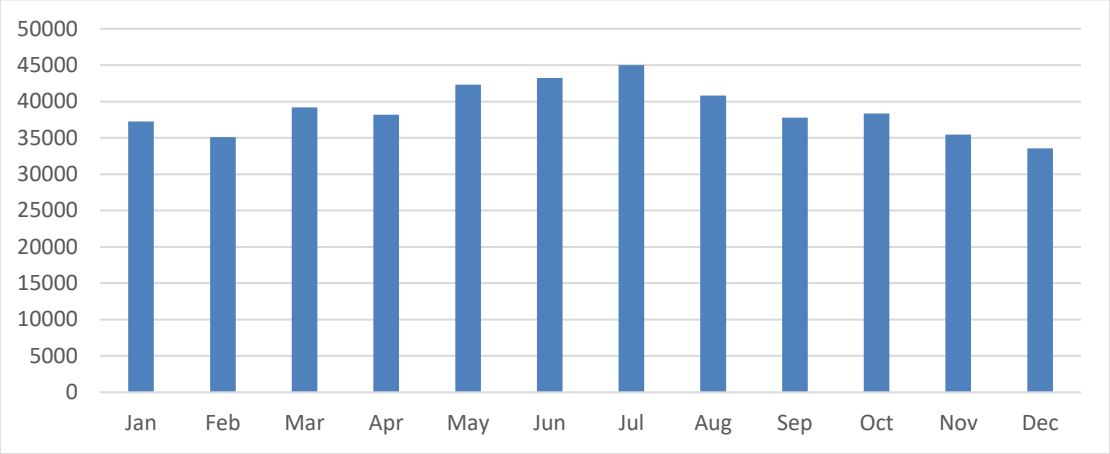



Figure F.35: 101 Seasonal Variation (3 Year Average 2017 - 19)

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

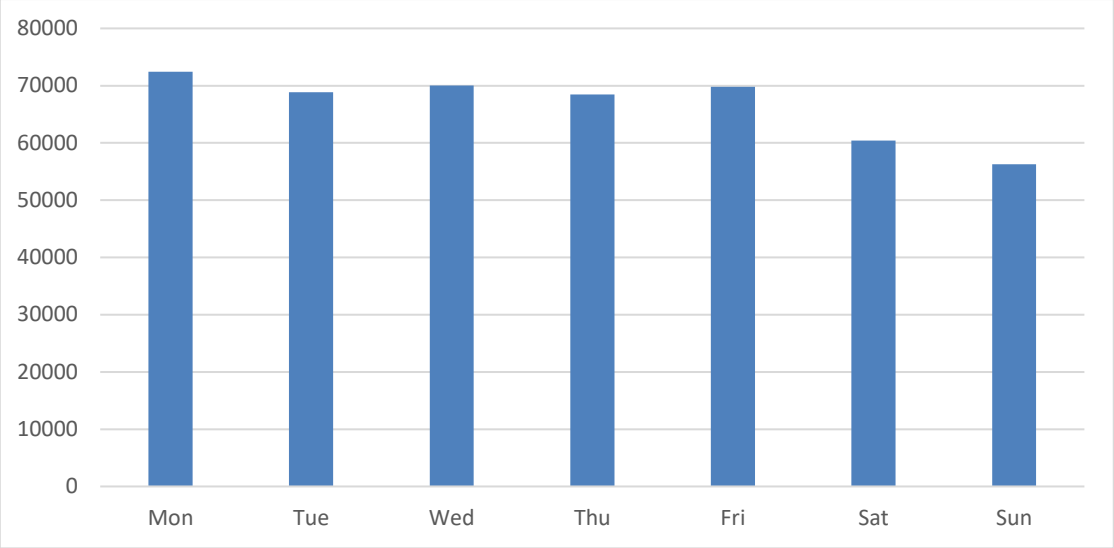



Figure F.36: 101 Demand by Day of the Week (3 Year Average 2017-19)

# Appendix G SZB AIL Movement Example

G.1.1 The Constabulary's has guided and assisted with the movement of many AILs along the A12 and B1122 corridors, including loads to the Sizewell B Power Station. That experience indisputably has shown the challenges that are to be faced by AILs accessing SZC. Information relating to one movement has been shared with the Applicant.

G.1.2 The load was classified as an STGO3 but although the dimension of the load was below the stated threshold for the Constabulary to require a Police escort, the decision to escort was taken jointly with the haulier (heavy lift and transportation specialist Mammoet) reflecting the weight, width, anticipated breaches of Traffic Regulations, and consequential moderately low speed of the AIL.

G.1.3 The AIL arrived on A14 under private escort where it joined the Police escort, which consisted of three uniformed offices on two marked motorcycles and a marked patrol car. The private escort vehicle continued with the AIL to Sizewell B.

G.1.4 The police escorted noted the alignment and corridor challenges that have been expressed previously within this note, namely:

- narrow sections of route where opposing vehicles could clash;
- tight turns and corners with limited forward visibility;
- traffic regulations which could be transgressed; and
- street furniture and vegetation which may be struck.

G.1.5 In negotiating these challenges, the Police escort was required to direct opposing traffic to hold at certain points along the route to allow the AIL vehicle to cross into the opposing lane or where the load was deemed to cause a risk to oncoming traffic.

G.1.6 Where appropriate the convoy was held in wider sections of the route or across junctions to allow following vehicles to pass the convoy, reducing congestion and delay.

G.1.7 Motorcycles were able to operate as a team with the patrol car and move between the rear and front of the convoy. As necessary they would move ahead to manage traffic to the side or to a stop; or clear and occupy junctions.

G.1.8 The patrol car would largely stay behind the AIL vehicle on sections of dual carriageway but would move ahead of the vehicle in single carriageway roads. In both cases, the car managed the oncoming traffic in accordance with the

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

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

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


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

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

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

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


G.1.12 The journey from A14 to Sizewell B took approximately 5.5hrs. Given the restrictions related to the hours and days AILs are permitted to operate, it is unlikely that more than two AIL convoys per shift could complete this journey.

G.1.13 Whilst not required during this movement, the Constabulary notes how Police escorting of AILs enables traffic to be managed when the convoy needs to be passed by other emergency services. This has dramatically reduced the impact on the response times on those occasions. Private escorts are not able to react to the situation and legally unable to direct traffic in those instances.

# Appendix H Areas covered by local policing operational areas

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

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

**SUFFOLK CONSTABULARY**
**SIZEWELL C PROJECT**

**COMMENTS ON DRAFT DEED OF OBLIGATION – REVISION 4.0**

## 1 GENERALLY

This table provides comments on the draft deed of obligation, highlighting initial key concerns and observations from the Suffolk Constabulary. It does not provide detail as to expected quantum of contributions etc.

## 2 FINANCIAL CONTRIBUTIONS

Although outside the scope of this commentary, SC highlights that the financial contributions will need to be able to 'flex' year on year to allow for greater than anticipated contributions to be paid. An appropriate mechanism is required in the deed of obligations. SC notes the mechanism agreed between Horizon Nuclear Power and the North Wales Police in this respect

In addition, financial contributions will need to be extended if the construction period exceeds the predicted/modelled time period. Furthermore it will be in all parties' interests to allow flexibility in relation to the spend of the financial contributions to allow the Constabulary to adjust capacity in the event of unforeseen need in certain areas

The Transport provisions of the deed do not address financial contributions to SC re AILS and agreement in this respect will be required

## 3 ACCOMMODATION

The Deed is silent as to onsite accommodation provision. When onsite, the Constabulary will require appropriately sized and serviced accommodation, delivered to a specification to be agreed and included in the deed at SZC's cost.

| Topic | Obligation/Issue | Commentary |
|---|---|---|
| Generally | Obligations to apply from Commencement | Commencement excludes (1) Preparatory Works and (2) operations consisting of the Relocated Facilities Works prior to the occurrence of the Transitional Date.<br><br>These would include potentially substantial elements of work are not addressed by mitigation, some of which should apply to prior to Commencement, for example funding of a Sergeant to enable early liaison work, and appointment of on-site security etc.. |
| Generally | Parties to the Agreement are SZC, SCC and ESC | SC is not party to the Agreement. SZC and Councils are to use reasonable endeavours to enter into deeds of covenant with 3rd parties. If the Deed of Covenant is not entered into, then the S106 permits alternative mitigation to be proposed ultimately.<br><br>The Deed of Covenant requires 3rd party recipient to put funds into interest-bearing account and repay unspent contributions. Furthermore, the Deed of Covenant requires an acknowledgement of funds source and permit /branding/logos etc.<br><br>The introduction of general "reasonable endeavours" provision, introduces an unacceptable level of risk outside SC's control, as such the obligation on SZC and the Councils to enter into a Deed of Covenant should be more firm, only where SC refuses to sign should the obligation fall away. SC is concerned about branding obligations which would not be appropriate. |
| Generally | Notices of key dates such as Commencement, Transitional Date, end of Construction are to be given by SZC to Councils | Notices should be copied to SC and SC may require further notifications to be given to it, depending on the structure of the financial contributions. |

| Topic | Obligation/Issue | Commentary |
|---|---|---|
| Generally | Financial contributions will be increased by CPIH (consumer prices index including owner-occupiers' housing costs) | SC is considering whether this is the appropriate index for financial contributions it requires. |
| Emergency Services Obligations | SZC to appoint an Emergency Coordinator before Construction (and to last throughout Construction) | SC considers that the Emergency Coordinator should be appointed and in post prior to the undertaking of any pre-Commencement works. If the Emergency Coordinator role is not filled, SC considers that the Councils should have the power to do so |
| Emergency Services Obligations | SZC to provide On Site Security before and during Construction | There is no further detail as to the scope or identify of the private security service. SC is considering further.<br><br>SC considers that the On Site Security should be appointed and in post prior to the undertaking of any pre-Commencement works. |
| Emergency Services Obligations | During Construction period, SZC to pay £[*] to SCC for onward payment to SC.<br><br>Payment is for reasonable dedicated additional resourcing related to potential temporary uplift in demand for local police services related to the Project. | The quantum and triggers of the financial contribution are to be agreed. Some element of the contribution will need to apply to pre-Commencement works.<br><br>It is highly likely that contributions will need to be made annually, and on the basis of workforce/need. The Constabulary will also require an ability for additional payments be made, which may, for example, be driven by increase in worker numbers (compared to the model), additional AIL requirements, insufficient mitigation, or an extended construction period etc<br><br>Both Suffolk Fire and Rescue Service and East of England Ambulance Service Trust receive funds in relation to preparation for and attendance at meetings of Community Safety Working Group during construction, and collaborative work with other stakeholders in the CSWG. The same should be extended to the Constabulary. |

| Topic | Obligation/Issue | Commentary |
|---|---|---|
| Emergency Services Obligations | During Construction, SZC to pay £[*] to SCC for onward payment to SC in the event that SC conducts a public safety initiative (the need for which is directly attributable to the Project). | As drafted, there is no absolute requirement for the funds to be paid. In addition SC has no right to request funds and SZC has the right to withhold funds. The Deed of Obligation will need to address these issues and the scope of public safety initiatives will need further consideration. |
| Emergency Services Obligations | CSWG to be established by SZE before Commencement Date and which will operate in accordance with defined terms of reference. CSWG to exist until end Construction. | Further detail regarding the CSWG terms of reference needed. The CSWG must have the power to receive monitoring reports of mitigation, and must have the ability to determine and agree any required changes during the construction to ensure the mitigation remains adequate, effective and appropriate. |
| Emergency Services Obligations | CSWG to meet every six months, or more frequently if agreed. Not more than Quarterly.<br><br>CSWG to determine a reporting protocol to ensure transparency, consistency, independence. | SC considers that quarterly meetings should be sufficient, but extraordinary meetings should be held if necessary. Meetings should be quorate without SZC presence. |
| Transport (Schedule 16) | Prior to Commencement, SZC will submit for approval TMMS (traffic management and monitoring system) | SC should be consulted on all matters which have a link to road safety. It is not sufficient to rely on consultation from the Councils or HE. |
| Transport | Prior to the end of Construction, SZC to prepare Operational Travel Plan | SC should be consulted on all matters which have a link to road safety. It is not sufficient to rely on consultation from the Councils or HE. |
| Transport | Transport Review Group is to be established. S106 sets meeting parameters | SC should be appointed to the TRG |
| Transport | Contingent Effects monitoring and funding | Further information as to Contingent Effects to be provided by SZC |

| Topic | Obligation/Issue | Commentary |
|---|---|---|
| Transport | Community Safety Working Group , Rights of Way Working Group, Wickham Market Working Group, Leiston Working Group, Marlesford and Little Glenham Working Group to be established | SC should be informed in advance of the meeting agendas and able to attend if it considers appropriate. Meeting minutes should be provided to SC. SC's costs of preparation, attendance, etc should be covered. |
| AILS | Prior to Commencement SZC is to submit details of the AIL Route Scheme to SCC for approval | SC is considering further the obligations necessary and applicable to AILS |