



**Sizewell C**  
**Written summaries of oral statements made at Issue**  
**Specific Hearings 1 to 4**  
**Suffolk Constabulary**

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# **1 INTRODUCTION**

- 1.1.1 This submission provides written summaries of the oral cases made by Suffolk Constabulary (“the Constabulary”) at the Issue Specific Hearings (“ISH”) held on 6 July 2021 to 9 July 2021.
- 1.1.2 This submission should be read in conjunction with the Constabulary’s Written Representation at Deadline 2 [REP2-168 and REP2-519], the points of which are not repeated here.

## **2 WRITTEN SUMMARY OF ORAL SUBMISSIONS FOR ISSUE SPECIFIC HEARING 1**

### **2.1 Overview**

- 2.1.1 This section provides a written summary of the oral case made by Suffolk Constabulary (“the Constabulary”) at the Issue Specific Hearing (“ISH”) on the draft Development Consent Order (“DCO”) and Section 106 Agreement / Deed of Obligation held on 6 July 2021.
- 2.1.2 The structure of this section follows the order of items as set out in the agenda published by the Examining Authority (“ExA”) on 29 June 2021 (“the Agenda”). Numbered agenda items referred to in this section are references to the bulleted items in the agenda. The Constabulary’s substantive participation commenced at Agenda Item 3 and as such this section does not cover Agenda Item 1 (welcome, introductions and arrangements for the Hearing) which was procedural and administrative in nature.
- 2.1.3 At this Hearing, the Constabulary’s submissions were made by Ben Stansfield (Solicitor at Gowling WLG (UK) LLP) and Detective Chief Superintendent David Cutler.

## 2.2 Written summary of the Suffolk Constabulary’s oral submissions for ISH1

Agenda Item	Suffolk Constabulary’s response
<b>2. Draft DCO</b>	
2.1: Securing mitigation, Code of Construction Practice, oLEMPs and related documentation, the appropriateness of “reasonable endeavours” and, “general accordance” as standards	See comments at Agenda Item 3.2.
2.2: The deemed marine licence	No comments.
2.3: Limits of deviation and the parameter plans	No comments.
2.4: Appeals and dispute resolution	No comments.
2.5: Tailpieces and EIA	No comments.
<b>3. The Section 106 Agreement / Deed of Obligation</b>	
3.1: The Sizewell Special Arrangements	No comments.
3.2: Securing the participation of third parties	At the Hearing, <b>Mr Stansfield</b> explained that the Constabulary would be one of the third parties to receive funds through the Section 106 Agreements and had comments on the mechanics of the Draft Deed of Obligation and concerns with the primary mitigation proposed. Prior to setting

Agenda Item	Suffolk Constabulary's response
	<p>out these comments, <b>Mr Stansfield</b> introduced Detective Chief Superintendent David Cutler to provide an overview of the Constabulary's position.</p> <p><u>The Constabulary's position</u></p> <p><b>Mr Cutler</b> explained that he has been leading the Constabulary's Sizewell C Planning Project Team for the last two years. <b>Mr Cutler added</b> that through strategic and operational governance, as well as using the experience and knowledge of key subject matter individuals, the Constabulary has worked with EDF and its partner organisations to understand and document its assessment of the policing impact from Sizewell C.</p> <p>The Constabulary takes a neutral approach to the Sizewell C proposal. It is the Constabulary's role as a statutory consultee to ensure that it can protect its communities and fulfil its core policing functions. There will be a significant impact on policing and neither resources nor funding should be diverted from elsewhere in Suffolk to the detriment of other communities the Constabulary serves.</p> <p>It is the Constabulary's understanding of its communities that allows them to police by consent and understand the services that are needed to deliver and how they deliver these. The Constabulary's policing model has been developed and refined over time. The model is based on the Constabulary's understanding of crime levels and crime types and the impact on different communities across Suffolk.</p> <p>Policing is not a one size fits all approach, it is complex and nuanced. It is wider than just crime and new threats and risks develop and change as the community changes. It is not appropriate to simply replicate incident modelling or police resourcing mitigation at Hinkley Point C to Sizewell C. Rather a bespoke solution based on evidence relevant to Suffolk and aligned with the Constabulary's operational approach is instead required. The virtues of local delivered policing are the bedrock of the British policing model. As the subject matter experts, the</p>

Agenda Item	Suffolk Constabulary’s response
	<p>Constabulary has provided its assessment of how crime and other policing demand will change and, what the Constabulary believes is the required mitigation.</p> <p>Mr Cutler explained that there are lessons to be learnt from what happened at Hinkley Point C. Unlike Avon and Somerset Police, the Constabulary is in a position to be able to review the approaches Avon and Somerset Police have taken as well as the experiences and approach of North Wales Police as they went through the examination process for the Wylfa Newydd Nuclear Power Station. Mr Cutler confirmed that the Constabulary has engaged with Avon and Somerset Police and North Wales Police to understand their experiences and the challenges faced. Mr Cutler added that Avon and Somerset Police would have taken a different approach if they were in the position the Constabulary is in.</p> <p>The Constabulary is committed to continuing to work constructively with the Applicant to reach a position on the agreed impacts and mitigation. <b>Mr Cutler</b> noted that both parties have made some positive steps towards this position but that there are still some significant differences that remain. These include the need for robust and effective monitoring of demand, changes to baseline information and the identified and accessible routes to additional mitigation.</p> <p><u>Deed of Covenant</u></p> <p>The Constabulary raised its concerns with the Deed of Covenant mechanism. <b>Mr Stansfield</b> noted that one of the Constabulary’s concerns related to the current wording that East Suffolk Council (“ESC”) or Suffolk County Council (“SCC”) and the Applicant shall use ‘reasonable endeavours’ to enter into an agreement with the third party. If a Deed of Covenant were not entered into, then ultimately, alternative mitigation could be proposed. The Constabulary considers that the Applicant, ESC and SCC should be under an absolute duty to enter into a Deed of Covenant with the Constabulary (or other third party as relevant), unless the Constabulary (or other third party as relevant) refused to do so. Currently, there is a remote possibility that the Constabulary does not receive funding via the Deed of Obligation, which is wholly unacceptable.</p>

Agenda Item	Suffolk Constabulary’s response
	<p>As referenced in Schedule 15 of the Draft Deed of Obligation [REP3-024], the Deed of Covenant requires payments to be payable by the Applicant to ESC or SCC for onward transfer to a ‘third party’, in this case the Constabulary. <b>Mr Stansfield</b> noted that if the funds are not paid to ESC or SCC, then the Constabulary would have no enforcement rights/claim against the Applicant. The Constabulary considers that the Draft Deed of Obligation should create a direct link to ensure the Applicant pays the funds to the Constabulary to create privity of contract, and giving the Constabulary a direct means of enforcement should the Applicant breach its contractual obligations to make financial contributions.</p> <p><u>Working Groups</u></p> <p>The Draft Deed of Obligation [REP3-024] refers to the establishment of several working groups. The Constabulary supports the establishment of these groups, particularly the Transport Review Group and Community Safety Working Group, however, is of the view that the governance of these groups needs to be reviewed. <b>Mr Stansfield</b> noted that a number of these working groups require the Applicant or a member representing the Applicant to be present for the meeting to be quorate. Therefore, if the Applicant decided to not attend a meeting, then no decision could be made.</p> <p>In relation to the Community Safety Working Group, <b>Mr Stansfield</b> noted that the Community Safety Management Plan is presently not secured and that the Draft Deed of Obligation [REP3-024] refers to Terms of Reference but these are not currently included in the draft Section 106. The Constabulary’s view is that the governance arrangements in the Draft Deed of Obligation need reviewing. Furthermore, as noted in the Constabulary’s Written Representation [REP2-168 and REP2-519] the Community Safety Working Group’s Terms of Reference should be extended to include an explicit reference to monitoring both evidenced effects and the effectiveness of deployed mitigation, with the Community Safety Working Group’s having the flexibility to determine and agree any required changes to community safety mitigation during</p>



Agenda Item	Suffolk Constabulary's response
	<p>the build period to ensure such mitigation remains proportionate, adequate, effective and appropriate.</p> <p><u>Emergency Services Contingency Contribution</u></p> <p>Schedule 4 of the Draft Deed of Obligation [REP3-024] refers to the Emergency Services Contingency Contribution. In the event that the Constabulary considers that additional funding is required, then SCC would be required to make an application, on behalf of the Constabulary, to the Applicant and the Applicant will decide whether the funding is required to be paid. <b>Mr Stansfield</b> explained that the Constabulary wishes that the wording of Schedule 4 of the Draft Deed of Obligation [REP3-024] is reviewed as there will be operational and confidential reasons as to why the Constabulary cannot make an application and then wait months for a meeting to be held and for the funding to potentially be released.</p> <p><u>Enforcement Practicalities</u></p> <p>In relation to enforcement, there are some key obligations that the Constabulary assumes should have stronger enforcement mechanisms. <b>Mr Stansfield</b> referred to the appointment of a community liaison service and in the event that the Applicant failed to appoint a liaison officer then it would be difficult to force them to appoint one. The Constabulary foresees that a liaison officer would be a key point of contact between contractors, local community groups and members of the public and as such, ESC and/or SCC should have the ability to appoint an officer in such circumstances.</p> <p><u>The Draft DCO</u></p> <p>The Constabulary noted the inclusion of Requirement 5A (Project Wide: Emergency Planning) in Revision 4 of the Draft DCO [REP2-014]. Requirement 5A states that <i>no part of the authorised development may commence until a Construction Emergency Plan has been developed</i>. As currently drafted, Requirement 5A only refers to the Fire and Rescue Authority and does not require other key emergency service stakeholders to be involved in the drafting</p>

Agenda Item	Suffolk Constabulary's response
	<p>and approval of the Construction Emergency Plan. <b>Mr Stansfield</b> added that there is no requirement to consult key emergency service stakeholders in developing or updating the Plan. It is expected that emergency planning arrangements specified in the Construction Emergency Plan, would be developed and agreed in consultation with key emergency service stakeholders, including the Constabulary as they provide important co-ordination and incident response capabilities.</p> <p>The Constabulary's view is that the Construction Emergency Plan should also be implemented at the start of the site preparatory works.</p>
<p>3.3: Enforcement practicalities - mechanisms, damages, injunctions and penalties</p>	<p>See comments at Agenda Item 3.2.</p>
<p>3.4: Land currently controlled by the Applicant</p>	<p>No comments.</p>

## **3 WRITTEN SUMMARY OF ORAL SUBMISSIONS FOR ISSUE SPECIFIC HEARING 2**

### **3.1 Overview**

- 3.1.1 This section provides a written summary of the oral case made by Suffolk Constabulary (“the Constabulary”) at the Issue Specific Hearing on traffic and transport matters (Part 1) held on 7 July 2021.
- 3.1.2 The structure of this section follows the order of items as set out in the agenda published by the Examining Authority (“ExA”) on 29 June 2021 (“the Agenda”). Numbered agenda items referred to in this section are references to the bulleted items in the agenda. The Constabulary’s substantive participation was at Agenda Item 2 and as such this section does not cover Agenda Items 1, 3 and 4.
- 3.1.3 At this Hearing, the Constabulary’s submissions were made by Ben Stansfield (Solicitor at Gowling WLG (UK) LLP) and Detective Chief Superintendent David Cutler. Adrian Neve (Director of Transport Planning at Stantec Ltd) was also present at this Hearing.

**3.2 Written summary of the Suffolk Constabulary’s oral submissions for ISH2**

Agenda Item	Suffolk Constabulary’s response
<b>2. Freight Management Strategy</b>	
2.1: Movement of freight by rail	No comments.
2.2: Movement of freight by sea	No comments.
2.3: Movement of freight by road	No comments.
2.4: Movement of freight by Abnormal Indivisible Loads (AIL)	<p>At the Hearing, the Applicant stated there is no legal obligation for the police to escort AILs. Responding to this statement, <b>Mr Stansfield</b> explained that whilst there is no legal obligation for the police to escort AILs, certain road regulations can only be breached effectively with assistance and guidance from the police. Adherence to the escort guidance 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 is required to deter dangerous driver behaviours and to direct traffic where AILs are unable to comply with signed road regulations. <b>Mr Stansfield</b> added that movement of freight by AILs requires notification to the Abnormal Loads Officer and the Constabulary would expect the Applicant to be taking guidance from them.</p> <p>Traffic management and the movement of AILs is a key priority for the Constabulary. <b>Mr Cutler</b> confirmed that, to date, there has been positive engagement between the Constabulary and the Applicant in relation to traffic and demand matters. <b>Mr Cutler</b> welcomes further engagement with the Applicant to reach a position on the agreed demand and mitigation.</p> <p><b>Mr Cutler</b> explained that the Constabulary is experienced in moving AILs but does not have a dedicated AILs team. The Constabulary therefore relies on trained officers working overtime or outside of their usual duties to assist. The escorting of AILs is resource intensive for the</p>

Agenda Item	Suffolk Constabulary's response
	<p>Constabulary. <b>Mr Cutler</b> noted there have been occasions when the Constabulary has been unable to move the AILs within the timeframe preferred by developers/hauliers due to resourcing and access and therefore the AILs could not be moved until the Constabulary had availability. It is also the policy of the Constabulary to only move AILs at certain times, such as during daylight hours due to the increased risk of moving AILs by night.</p> <p>The existing trained resource and approach to escorting AILs would be unable to cope with the volume and frequency of AIL movements requiring the Constabulary's escort during the construction period. <b>Mr Cutler</b> noted that additional resources would be required, in the form of a dedicated AIL Unit. This would allow the Constabulary to support and facilitate the associated movement of AILs, particularly those associated with Sizewell C, along Suffolk's road network in an efficient and safe manner.</p>

## **4 WRITTEN SUMMARY OF ORAL SUBMISSIONS FOR ISSUE SPECIFIC HEARING 3**

### **4.1 Overview**

- 4.1.1 This section provides a written summary of the oral case made by Suffolk Constabulary (“the Constabulary”) at the Issue Specific Hearing (“ISH”) on traffic and transport matters (Part 2) held on 8 July 2021.
- 4.1.2 The structure of this section follows the order of items as set out in the Agenda published by the Examining Authority (“ExA”) on 29 June 2021 (“the Agenda”). Numbered agenda items referred to in this section are references to the bulleted items in the Agenda. The Constabulary’s substantive participation was at Agenda Item 3 and as such as this section does cover the other Agenda items.
- 4.1.3 At this Hearing, the Constabulary’s submissions were made by Ben Stansfield (Solicitor at Gowling WLG (UK) LLP) and Detective Chief Superintendent David Cutler. Adrian Neve (Director of Transport Planning at Stantec Ltd) was also present.

#### 4.2 Written summary of Suffolk Constabulary’s oral submissions for ISH3

Agenda Item Suffolk Constabulary’s response	
<b>3. Monitoring and Control Mechanisms for Traffic and Transport</b>	
3.1: Early Years controls in the DCO	No comments.
3.2: Construction Traffic Management Plan	<p><u>The Constabulary’s Position</u></p> <p><b>Mr Cutler</b> commented on the need for the Constabulary to be on the Transport Review Group proposed to be established (the "TRG") and how changes to the Abnormal Indivisible Load ("AIL") matrix and the CTMP generally would impact the Constabulary and its resourcing. <b>Mr Cutler</b> explained that the Constabulary is a key stakeholder in respect of traffic and transport matters and is the principal organisation when it comes to managing the impacts of safety and regulation on the county roads. These include responding to broken down vehicles, obstructions to the highway, accidents and traffic offences.</p> <p><b>Mr Cutler</b> added that at present, the Draft Deed of Obligation proposes that the Constabulary is only permitted to attend the TRG on an ad-hoc basis, when invited. The Constabulary is therefore reliant on additional mechanisms to feedback to the Applicant about the on-going monitoring and management of the network and the effectiveness of the measures committed to if they have to deal with the implications of decisions made in the TRG that they were not asked to attend. <b>Mr Cutler</b> explained that the Constabulary should have full representation on the TRG to allow for better planning and review and be capable of having an influence on decisions being made.</p> <p>In relation to AILs, the Constabulary reinforced its points made at ISH 2. <b>Mr Cutler</b> explained that escorting AILs is training and resource intensive. It is undertaken by trained officers who are out of probation (two to three years in duty) and passed specialist courses. The existing trained resource and approach to escorting AILs would be unable to cope with the volume and frequency of AIL movements required to be escorted by the Constabulary during the construction period of the project. Therefore, <b>Mr Cutler</b> added that the Constabulary should be involved in discussions surrounding changes to the CTMP and in particular the detailed abnormal</p>

Agenda Item	Suffolk Constabulary's response
	<p>load route assessment, and matrix relating to escorting AILs to ensure the Constabulary could support and facilitate the associated movement of AILs along Suffolk's road network in an efficient and safe manner.</p> <p><u>Comments on the CTMP and TRG</u></p> <p>The Construction Traffic Management Plan ("CTMP") includes AIL arrangements and governance. The Constabulary has been led to believe that the final CTMP will provide a detailed abnormal load route assessment, including a matrix relating to escorting AILs. The final agreed matrix will be included in the final CTMP that will be appended to the Deed of Obligation. The Constabulary observes with some surprise (given that it is a fundamental element of mitigation) that the final CTMP is not to be secured by a requirement within the DCO.</p> <p><b>Mr Stansfield</b> noted that amendments to the CTMP, including changes to the AIL matrix, would be approved by the Transport Review Group ("TRG"). Paragraph 2.3.1 of the CTMP [REP2-054] refers to all key transport stakeholders being on the TRG. The Constabulary assumes that it is an oversight that the Constabulary has not been invited to join the TRG. <b>Mr Stansfield</b> added that it is unsatisfactory for the Constabulary to simply be invited to the TRG meetings on an ad hoc basis. The Constabulary has presented in its Written Representation [REP2-168 and REP2-519] the reasons why they should be part of the TRG.</p> <p><b>Mr Stansfield</b> explained that the Constabulary is concerned that the Applicant has 50% of the TRG voting rights (including 2 representatives and the Transport Co-ordinator that is appointed by the Applicant) and find it unusual for the Applicant to have such influence on fundamental documents which provide key transport mitigation. <b>Mr Stansfield</b> added that the voting rights are important because not only can the TRG vote on matters brought to it by the Applicant, including potential changes to documents such as the CTMP, but the Applicant can also block majority votes, giving it an effective right of veto to changes to the CTMP that others feel are of critical importance. Paragraph 3.8 of Schedule 16 of the Deed of Obligation [REP3-024] states that the Applicant "<i>shall implement any proposed mitigation approved by the TRG</i>". However, the Constabulary notes that the TRG is not quorate and therefore has no power to make decisions if the Applicant fails to attend.</p> <p>At ISH 2, Mr Cutler explained that an AIL dedicated team would be required to provide escort for AILs associated with the project. Changes to the AIL matrix could result in additional resource being required. The Constabulary</p>



Agenda Item	Suffolk Constabulary's response
	<p>therefore proposed that the Deed of Obligation restricts the Applicant from making changes to the AIL matrix without first agreeing appropriate mitigation with the Constabulary.</p> <p>The Constabulary's view is that the TRG and CTMP should be implemented for the preparatory works where there will be construction traffic and not solely at commencement.</p> <p>The Constabulary believes that the Applicant should covenant in the Deed of Obligation – directly in favour of the Constabulary – not to propose any amendment to the AIL matrix in the CTMP unless it has first agreed appropriate mitigation with the Constabulary. This would prevent changes which would be adverse to the Constabulary from being made.</p>
<p>3.3: Construction Worker Travel Plan</p>	<p>The Constabulary had no comments on the Construction Worker Travel Plan (“CWTP”). In this instance, the Constabulary would refer the ExA to Section 2.2 of Part 3 of its Written Representation which states that:</p> <p><i>“Policing issues are not explicitly covered in the draft Construction Worker Travel Plan (CWTP) [APP-609], however the measures proposed within the CWTP will have implications for policing which need to be understood. The draft CTWP does not reflect the need for the Constabulary to be engaged in the management and monitoring of the CTWP. However, there could be residual actions that need the Constabulary to be involved in Community Policing initiatives to assist with reductions in transport related crime or help with proactive travel measures. Therefore, the Constabulary requests that the Applicant reviews the involvement of the Constabulary in the drafting and monitoring of the finalised CWTPs.”</i></p> <p>The CWTP is one of the plans that the TRG would be responsible for reviewing and approving. The Constabulary considers that it should be a member of the TRG in order to proactively manage traffic and transport-related impacts.</p>
<p>3.4: Traffic Incident Management Plan</p>	<p>As set out in the Section 2.2 of Part 3 of the Constabulary's Written Representation, the Constabulary agrees with the principles of the Traffic Incident Management Plan (“TIMP”) but considers that policing issues have not been sufficiently covered in the TIMP.</p> <p>The TIMP references liaison with the Constabulary, however, there is little clarity set out in the TIMP about how the communications will be undertaken and at what frequency. The Strategic Communications Protocol which</p>

Agenda Item	Suffolk Constabulary's response
	<p>may be offered as a suggestion to the Constabulary's concerns is not regarded as a robust solution to deal with critical safety and urgent issues.</p> <p>As currently drafted, the TIMP does not provide a robust basis to plan for incidents. The Constabulary has asked for a scenario matrix of predictable incidents to be prepared and considered in order to refine the approach to managing them. This should be completed prior to consent.</p> <p>The TIMP references the TRG and its role in considering amendments / changes to the plan. The Constabulary explained, that as traffic safety and policing experts, they should be a full member of the TRG and not participate on ad-hoc basis.</p>
3.5: Operational Travel Plan	No comments.

## **5 WRITTEN SUMMARY OF ORAL SUBMISSIONS FOR ISSUE SPECIFIC HEARING 4**

### **5.1 Overview**

- 5.1.1 This section provides a written summary of the oral case made by Suffolk Constabulary (“the Constabulary”) at the Issue Specific Hearing (“ISH”) on socio-economic and community issues held on 9 July 2021.
- 5.1.2 The structure of this section follows the order of items as set out in the agenda published by the Examining Authority (“ExA”) on 29 June 2021 (“the Agenda”). Numbered agenda items referred to in this section are references to the bulleted items in the agenda. The Constabulary’s substantive participation commenced from Agenda Item 2 and as such this section does not cover Agenda Item 1 (welcome, introductions and arrangements for the Hearing) which was procedural and administrative in nature.
- 5.1.3 At this Hearing, the Constabulary’s submissions were made by Ben Stansfield (Solicitor at Gowling WLG (UK) LLP) and Detective Chief Superintendent David Cutler. Duncan Smart (Associate Planner at Stantec Ltd) and Inspector Mark Jackson were also present on behalf of the Constabulary.

## 5.2 Written summary of Suffolk Constabulary’s oral submissions for ISH4

Agenda Item	Suffolk Constabulary’s response
<b>2. Socio-economics</b>	
<p>2.1: The local economy, including local businesses and the local supply chain</p>	<p>Paragraph 9.6.4 of Chapter 9 (Socio-economics) of the Environmental Statement (“ES”) [APP-195] refers to primary mitigation measures proposed to mitigate potentially significant effects. In light of the revision to the implementation plan [REP2-044], <b>the ExA</b> requested clarification from the Applicant on the effects those revisions may have and whether any revisions to the information within Chapter 9 of the ES would be required.</p> <p>In response to the ExA’s questions, the Applicant indicated that further clarity would be provided through submissions at Deadline 5. The Constabulary will need to review any new or updated submissions before being able to confirm whether proposed construction programme changes have any police resourcing implications.</p> <p><b>Mr Cutler</b> stated that if there is an extension to the time period presented in the implementation plan then the Constabulary would expect that there would be a change in the demand profile. The Constabulary welcomes clarification and will reflect on that in light of that clarity being provided.</p>
<p>2.2: Employment impacts during construction, and operation, including employment churn</p>	<p>No comments.</p>
<p>2.3: Required skills and education initiatives, skills enhancement packages, prior to and during construction,</p>	<p>No comments.</p>

Agenda Item	Suffolk Constabulary's response
operation, and post construction	
2.4: Tourism impacts prior to and during construction, and post construction, the methodology of assessment and suitability of the Tourism fund	No comments.
2.5: Effect on rail services and capacity for infrastructure improvements during the construction period	No comments.
2.6: Monitoring and mitigation measures	No comments.
<b>3. Community issues</b>	
3.1: Demographic modelling (including gravity model) and implications of minor changes in forecasting	<p>Community safety and policing impacts are predicted to occur during the construction phase of the project due to factors including substantial demographic changes resulting from the predicted construction workforce. Therefore, important factors for the Constabulary are understanding the total number, demographic profile, home based/non-home based workers composition and daily residence of that workforce.</p> <p><b>Mr Cutler</b> explained that the modelling conducted by the Constabulary to forecast its demand profile and proposed mitigation was based on the Applicant's gravity model and figures provided within the</p>

Agenda Item	Suffolk Constabulary’s response
	<p>DCO. Thus, if there are any significant changes to the Applicant’s demographic modelling, then the Constabulary wishes to review and comment on revised modelling. <b>Mr Cutler</b> added that the Constabulary has no significant concerns on the gravity model currently presented. The Constabulary is not concerned about the predicted spatial distribution of non-home based workers but is interested in the predicted demographic profile, HB/HNB spilt and duration of stay.</p> <p><b>The ExA</b> asked if the Constabulary were content with their involvement in the planning, monitoring and managing approach that East Suffolk Council (“ESC”) have indicated. <b>Mr Cutler</b> explained that robust workforce monitoring (level, profile and location) is required, and that the Constabulary would liaise with ESC and the Applicant to confirm its position in respect of this monitoring.</p>
<p>3.2: Housing and accommodation strategy, including location, size and timing of provision of the accommodation campus and caravan site at the LEEIE</p>	<p>No comments.</p>
<p>3.3: Influx of non home based workers</p>	<p>No comments.</p>
<p>3.4: Emergency services impacts, and implications for community safety</p>	<p><b>Mr Cutler</b> explained that the Constabulary has been engaging positively with EDF for over five years. Due to the weaknesses and gaps in the Applicant’s assessments, the Constabulary has undertaken a detailed assessment of policing impacts and has since discussed its findings with the Applicant.</p> <p><b>Mr Cutler</b> confirmed that whilst there are areas of agreement between the Applicant and the Constabulary, there are still areas of significant disagreement. The Constabulary and the Applicant agree on the need for a locally based neighbourhood style team, similar to Avon and Somerset Police’s ‘Beat Team’, that would be embedded within the local community. <b>Mr Cutler</b> added that the Constabulary and the Applicant also agree that there is demand on policing that sits outside of the Beat</p>

Agenda Item	Suffolk Constabulary's response
	<p>Team. However, <b>Mr Cutler</b> explained that the Constabulary and the Applicant still do not agree on what the demand profile looks like and thus the quantum or structure of mitigation required to address that demand. The Constabulary welcomes continued engagement with the Applicant on these matters but noted that if agreement is not reach on key matters, a more focused Issue Specific Hearing may be required.</p> <p>Throughout pre-application, pre-examination and examination stages, the Constabulary has been regularly engaging with its policing colleagues in Avon and Somerset and North Wales. <b>Mr Cutler</b> explained that members of Suffolk Constabulary have visited the Hinkley Point C site before and during construction to understand how the construction period at Sizewell would impact on policing in Suffolk. <b>Mr Cutler</b> added that members of the team have also met North Wales Police to understand their approach to modelling demand and securing mitigation in relation to the Wylfa Newydd Nuclear Power Station.</p> <p>The Constabulary's view is that its modelling is robust. <b>Mr Cutler</b> added that the Constabulary recognises there are differences between what the Constabulary has modelled and what the Applicant has modelled. However, as mentioned by many Interested Parties, the context of Hinkley Point C is vastly different to the context of Sizewell, including the demand, demographic and communities, and using a model based on what has been observed at Hinkley Point C is not proportionate or representative for Leiston or Sizewell communities. The Constabulary also has concerns regarding the approach adopted to monitor demand at HPC, as detailed within their Written Representation.</p> <p><b>Mr Cutler</b> noted that the approach adopted at Hinkley Point C is based on a single community team. However, the Constabulary's assertion throughout our modelling and discussions with the Applicant, is that there is a need for a wider policing resource due to the amount of demand but also the nature of the demand and the complexity of it. <b>Mr Cutler</b> added that incident data provided by Avon and Somerset Police suggest:</p>

Agenda Item	Suffolk Constabulary's response
	<ul style="list-style-type: none"> <li>• 50% of calls associated with Hinkley Point C required an immediate response. Note, blue light responses fall outside of the remit of community teams in Suffolk.</li> <li>• 48% of Hinkley Point C Computer Aided Dispatch (CAD) calls required police attendance. Note, 39% of Suffolk CADs required immediate police attendance.</li> <li>• 48% of Hinkley Point C CADs were outside of the operating hours of the Beat Team.</li> </ul> <p>Based on discussions with Avon and Somerset Police, the Constabulary understands that a proportion of these figures are linked to night-time economy issues. <b>Mr Cutler</b> explained that the Constabulary looked at how these incidents within its modelling and noted:</p> <ul style="list-style-type: none"> <li>• 31% linked to crime and anti-social behaviour issues.</li> <li>• 21% linked to transport-related issues. Note, 13% of calls in Suffolk are linked to transport-related issues.</li> <li>• 25% linked to safety and welfare issues.</li> </ul> <p><b>Mr Cutler</b> explained that the Constabulary investigated the interface of policing units in Avon and Somerset Police with a sample of individual crimes associated with the Hinkley Point C workforce or project. For example:</p> <ul style="list-style-type: none"> <li>• For a sexual offence, the Constabulary counted 10 different teams interfacing with that single investigation in Avon and Somerset.</li> <li>• For a common assault, the Constabulary counted 11 different teams interfacing with that single investigation in Avon and Somerset.</li> </ul> <p>This demonstrates that policing is complex, with multiple specialist units working together to fulfil policing duties of specialist units that come together to fulfil their parts and their duties from the point of</p>



Agenda Item	Suffolk Constabulary's response
	<p>a call coming into the Constabulary through to the point of arrest and through the criminal justice system, as a result there will be impacts from Sizewell throughout the Constabulary, and not just those officers visible near the site.</p> <p>In relation to mitigation, Mr Cutler noted the Constabulary has had discussions with the Applicant regarding proposed security vetting and Worker Code of Conduct mitigation measures but has raised concerns regarding how effective these have been at Hinkley Point C and their limited effectiveness in reducing policing demand and community safety impacts arising from Sizewell C.</p> <p>Following the response from Mr Cutler, it was observed that other Interested Parties all made key points aligned with the Constabulary's position. In particular, as Mr Cutler had noted an effective and appropriate mitigation strategy is needed which reflects the local context of the Sizewell C project in Suffolk.</p>
3.5: Sports and recreation provision and assessment	No comments.
3.6: Health effects of a 9-12 year construction period on the local community	No comments.
3.7: Effects of the freight strategy on the health and wellbeing of the local communities	No comments.

Agenda Item	Suffolk Constabulary’s response
3.8: Monitoring and mitigation measures	<p>The Constabulary’s view is that the mitigation proposed in the Deed of Obligation [REP3-024] is not currently adequate. <b>Mr Stansfield</b> summarised the Constabulary’s main concerns:</p> <ul style="list-style-type: none"> <li>• <u>Emergency Services Financial Contribution</u>: the Constabulary does not know the detail on the financial contributions proposed by the Applicant. Linked to <b>Mr Cutler’s</b> comments on Agenda Item 3.4, the quantum of resourcing and thus of financial mitigation is yet to be agreed</li> <li>• <u>Emergency Services Contingency Fund</u>: Schedule 4 of the draft Deed of Obligation [REP3-024] proposes an Emergency Services Contingency Fund. However this approach is problematic for the Constabulary. The Contingency Contribution is akin to a locked safe containing a specific, albeit currently unknown, sum of money within it could be used for very narrowly defined matters. In the event that the Constabulary considers that additional funding would be required, then SCC would be required to make an application, on behalf of the Constabulary, to the Applicant and the Applicant would decide whether the funding is required to be paid. The Constabulary’s view is that this approach is inadequate as it is entirely removed from the process, which gives absolute control to the Applicant.</li> <li>• <u>Community Safety Working Group (“CSWG”)</u>: as per the current draft DCO, the CSWG would be established from commencement based on the current draft of the Deed of Obligation, however the Constabulary’s view is that the CSWG should exist during preparatory works. The CSWG is required to meet only 2 to 4 times a year and would receive reports on community safety matters and report to the Social Review Group (“SRG”) on the evidence received. From reviewing the Deed of Obligation, the Constabulary understands that the CSWG has no ability to recommend actions to the SRG or address these impacts itself. Furthermore, if the Applicant did not attend the CSWG meeting, then the Group would not be quorate.</li> <li>• <u>Social Review Group</u>: similarly to the TRG, the Applicant has 50% of the TRG voting rights. The Constabulary questioned the likelihood of meaningful reactions to issues raised with this voting approach. <b>Mr Stansfield</b> added that it is unclear from the draft Deed of Obligation whether the SRG has the power to fund unforeseen mitigation. As currently drafted, the Constabulary’s view is that the CSWG and SRG are wholly inadequate as a governance / mitigation mechanism.</li> </ul>

Agenda Item	Suffolk Constabulary's response
	<ul style="list-style-type: none"> <li>• <u>Review and monitoring</u>: the modelling undertaken by the Constabulary has been extremely thorough; however if there were additional impacts arising in the community, these would need to be policed, which would in turn impact the Constabulary's resources. Similarly, if there were fluctuations in workforce numbers or changes in the location of where the workforce is staying, there would need to be flexible and responsive mitigation. The Deed of Obligation therefore clearly needs robust monitoring and contingency provisions, which is currently absent.</li> </ul> <p>The Constabulary is concerned about the cost of responding to impacts which might be foreseen but cannot readily be modelled in advance – for example, impacts arising from organised crime or county lines. Addressing impacts such as these would require additional resources, the cost of which either falls to the Constabulary – for example the Suffolk taxpayer, or to the Applicant. The Constabulary's view is that those costs should fall to the Applicant and that the Deed of Obligation should therefore include a secure and robust mechanism for adequate contingency funding. This would allow policing to be delivered fully, fairly, and fast.</p> <p>Discussions with the Applicant are ongoing but given the significant differences between both parties, the Constabulary wishes to see quicker progress and for those discussions to be increasingly productive. The Constabulary would welcome a timetable from the Applicant to ensure their aspirations for reaching agreement are met. As noted by <b>Mr Cutler</b> at Agenda Item 3.4, the Constabulary would also welcome a further Issue Specific Hearing on community safety matters.</p>