



Sizewell C
DCO Written Representation
Part 3 – Comments on DCO Application
Suffolk Constabulary

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1 Introduction

1.1 Background

- 1.1.1 This document forms Part 3 of the Written Representation ('WR') submitted by Suffolk Constabulary ('the Constabulary') regarding the Sizewell C (SZC) Development Consent Order (DCO) application. The WR builds directly on a Relevant Representation submitted by 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 As indicated in the Constabulary's Relevant Representation (September 2020), the Constabulary's WR comprises two substantive elements and a summary:
- **Part 1** – Summary (in accordance with WR submission requirements)
 - **Part 2** – SZC Policing Impact Assessment (PIA): Suffolk Constabulary's assessment of likely community safety and associated policing impacts.
 - **Part 3** – Collated Suffolk Constabulary comments regarding SZC DCO application as submitted by the scheme promoter, NNB GENERATION COMPANY (SZC) Ltd (hereafter 'the Applicant') (this document).

1.2 Purpose

- 1.2.1 The 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 and associated mitigation requirements.
- 1.2.2 To inform the WR, the Constabulary reviewed relevant DCO application documents pertaining to the assessment of community safety impacts and associated mitigation proposals. This part of the WR sets out the Constabulary's comments regarding relevant application documents in relation to the assessment and acceptability of community safety impacts as predicted by the Applicant.

1.3 Structure

- 1.3.1 The remainder of this part of the WR is structured as follows:
- **Section 2.1** sets out the Constabulary's comments on SZC DCO application documents relating to socio-economics and community safety matters.
 - **Section 2.2** sets out the Constabulary's comments on SZC DCO application documents relating to transport planning, and access and movement matters.

2 Suffolk Constabulary’s Comments on the SZC DCO Application

2.1 Socio-economic related comments

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6.2 Volume 1 – Introduction to the Environmental Statement – Chapter 6 (Environmental Impact Assessment Methodology) (APP-177)	SOCIO_1.1	<p>The Constabulary agrees with the main steps in undertaking the EIA described in Plate 6.1. However, the Constabulary is concerned that the Applicant’s methodology has not been applied in the assessment presented in Chapter 9 (Socio-economics) of the ES (APP-195). The Constabulary therefore considers that Chapter 9 (Socio-economics) of the ES (APP-195) does not present a full and robust assessment of likely significant community safety and policing impacts, including the identification of associated mitigation requirements.</p> <p>Plate 6.1 clearly demonstrates that mitigation measures should be identified following the assessment of likely impacts. However, the Applicant has not presented a full assessment of likely community safety impacts on a pre-mitigation basis and has not demonstrated that specific further mitigation that will be effective in avoiding likely significant adverse effects, whilst the valency of some effects is also not defined. This makes it difficult for the Constabulary to determine the adequacy and effectiveness of proposed community safety mitigation.</p>
6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement (APP-195)	SOCIO_2.1	<p><i>Summary Comments</i></p> <p>The Constabulary welcomes the inclusion of demographic effects and resulting impacts on community safety and emergency services as topics within the scope of the EIA, together with the intention to assess net additional community and policing effects. However, from reviewing the impact presented within Chapter 9 (Socio-economics) of the ES (APP-195) and associated Community Safety Management Plan (CSMP) (APP-635), the Constabulary is concerned that key points made in our pre-application consultation responses do not appear to have been fully addressed and in consequence there are gaps in the formal assessment of community safety impacts. In particular:</p> <ul style="list-style-type: none"> • Narrow scope of assessment - the singular focus of the policing impact assessment (see paragraphs 9.7.216 – 9.7.230 within Chapter 9 (Socio-economics) of the ES (APP-195)) on recorded (i.e. Home Office notifiable) crimes rather than considering wider community safety impacts requiring police involvement (whether in terms of prevention, deterrence, safeguarding, incident response or investigation). • Limited consideration of demographic factors – whilst a quantitative assessment of population dynamics has been undertaken, this 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 non-home based (NBH) construction workforce in a rural community). <p>The Constabulary is also concerned that the impact assessment presented fails to properly recognise that the primary receptor in relation to community safety is the impacted population itself, comprising 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</p>

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		<p>workforce (construction and operational). With the responsibility for providing territorial policing across Suffolk, the Constabulary performs a critical management and mitigation role to prevent, minimise and then address community safety impacts when incidents (i.e. impacts on or affecting the population as the primary receptor) occur.</p> <p>As detailed below in relation to individual sections, the Constabulary therefore considers that Chapter 9 (Socio-economics) of the ES (APP-195).does not present a full and robust assessment of likely significant community safety and associated policing impacts. Whilst it is acknowledged that the assessment does identify a pre-mitigation likely significant effect at the local level, pointing to the need for mitigation, the assessment only captures a predicted increase in recorded crime rather than the much wider likely adverse community safety impacts which also need to be identified and adequately mitigated. To avoid residual likely significant adverse effects, sufficient capacity and other mitigation needs to be in place to allow the Constabulary to adequately and effectively respond to all relevant and likely community safety impacts from the SZC Project.</p>
	SOCIO_2.2	<p><i>Methodology</i></p> <p>The criteria adopted to determine the level and significance of likely effects are weak:</p> <ul style="list-style-type: none"> • It is not clear why the valency (positive/negative) of predicted population dynamic effects has not been explored, especially as substantial demographic changes are themselves likely to generate community safety impacts (with these impacts depending on the nature of the change). Table 9.1 within Chapter 9 (Socio-economics) of the ES (APP-195) should have stated that effects could either be positive or negative depending on their nature and implications, allowing such effects to be assessed on this basis and for the community safety implications of predicted demographic changes to be fully explored. The absence of valency judgements in relation to population dynamic effects limits the ability of the ES chapter to understand, assess and adequately mitigate all likely significant effects, as it is difficult to identify specific mitigation and to confirm the effectiveness of this in avoiding specific significant adverse effects. • The methodology employed to establish the significance of effects on crime and policing is deficient as: <ul style="list-style-type: none"> - It is based solely on a predicted percentage change in 'recorded' (i.e. Home Office notifiable) crimes over a limited period, which excludes non-notifiable crimes and other non-crime incidents that form significant elements of the Constabulary's workload. The narrow scope of the assessment is therefore inappropriate. - The predicted percentage change in recorded crime has been calculated on a per capita basis so does not account for the demographic characteristics of the workforce. Existing deprivation in Leiston, as identified within the Community Impact Report (APP-156), has also not been factored into the assessment. - The methodology simply assumes community safety mitigation will be adequate to address a predicted pre-mitigation significant adverse effect on community safety and policing, without demonstrating the effectiveness of mitigation including the required quantum of additional police resourcing. This approach is not aligned with the EIA methodology set out within Plate 6.1 and under paragraph 6.4.2 within Chapter 6 (Environmental Impact Assessment Methodology) (APP-177). - The role of the CSMP, namely to provide mitigation in respect of likely adverse effects assessed in the Environmental Statement, is incorrectly conflated within the significance criteria with a potential to generate beneficial effects. As a mitigation device, implementation of the CSMP cannot itself generate a substantive impact.

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		<p>Section 9.4.16 within Chapter 9 (Socio-economics) of the ES (APP-195) provides no explanation for the difference between the predicted maximum extent of daily travel in relation to non-home-based (NHB) workers of 60 minutes and the predicted Construction Daily Commuting Zone (CDCZ) for home-based workers defined as 90 minutes. This undermines confidence in the predicted HB/NHB construction workforce split, which is important as any changes to this distribution could result in substantially different community safety impacts and associated policing mitigation requirements.</p> <p>At paragraph 9.4.10 in Chapter 9 (Socio-economics) of the ES (APP-195) it is suggested the technical notes which form appendices to Chapter 9 were prepared through engagement and consultation, with Plate 9.1 above suggesting this includes consideration of “community safety, emergency service & response”. Appendices 9A – 9E (APP-196) do not directly address community safety matters and the Constabulary was not in their development.</p>
	SOCIO_2.3	<p><i>Assessment Scope and Findings</i></p> <p>This chapter includes only a very short assessment of population dynamics (i.e. demographic change), with no consideration given to the influence of the future baseline population or reference back to the baseline conditions outlined in Section 9.5. The impact assessment is therefore solely focused on the characteristics of the SZC construction workforce in isolation rather than being grounded in baseline conditions or considering likely effects from the introduction of the workforce alongside the existing population. In consequence, the assessment does not robustly address the likely change in the demographic profile resulting from the introduction of a substantial male-dominated, younger age population. This is of concern to the Constabulary as the scale of the change in demographic profile within Leiston and more widely across Suffolk is likely to generate a range of adverse community safety impacts, all of which will need to be adequately mitigated.</p> <p>The Constabulary’s main concerns regarding the assessment of crime and policing impacts are:</p> <ul style="list-style-type: none"> • Narrow scope of assessment - the singular focus of the small policing impact 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 non-home based (NBH) construction workforce in a rural community). • Over-reliance upon the experience (perceived or actual) of the construction of Hinkley Point C (HPC) project within the Avon and Somerset Police area to predict and mitigate community safety and policing impacts from the SZC project in Suffolk. The assessment includes no consideration of geographical demographic, socio-economic, or policing differences between the two developments.

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		<ul style="list-style-type: none"> The claim at paragraph 9.7.28 of Chapter 9 (Socio-economics) of the ES (APP-195) that the predicted increase in recorded crime as a result of the SZC project (based on data from HPC) may be an “over-estimate” is not supported by evidence and should be disregarded. As detailed in Part 2 of the WR, 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 impacts from the SZC project, owing to known weaknesses with this data including under-reporting and as the assessment of likely impacts and the development of associated mitigation must be based on data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project in Suffolk. <p>At paragraph 9.7.29 of Chapter 9 (Socio-economics) of the ES (APP-195) the assessment recognises that recorded crime is only one contributor towards policing demands (i.e. to mitigate community safety impacts) and that others which are “not categorised” can lead to greater demands for police resourcing. However, the assessment makes no conclusion as to what these wider policing demands are, whether consideration of them in addition to recorded crime would alter the stated EIA significance conclusion and how such wider policing demands will be adequately mitigated.</p> <p>Relevant community safety “concerns” are listed in paragraph 9.7.192 (in relation to effects on social services) and the SZC Community Safety Management Plan (CSMP) (APP-635) lists a suite of community safety risks at paragraph 1.1.6. The Constabulary considers that all of the listed community safety impacts and risks are 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. It is therefore unfortunate that the crime and policing assessment presented at paragraphs 9.7.216 – 9.7.230 of Chapter 9 (Socio-economics) of the ES (APP-195) does not take account of these wider community safety impacts, instead focusing solely on a per capita based calculation of % change in recorded crime.</p> <p>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.</p>
	SOCIO_2.4	<p><i>Mitigation</i></p> <p>Paragraph 9.6.38 of Chapter 9 (Socio-economics) of the ES (APP-195) states that the CSMP forms tertiary mitigation developed in response to the EIA assessment. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at addressing specific likely effects in order to constitute effective EIA mitigation. However, the CSMP does not do so as it defers to the Community Safety Working Group and individual future Strategic Relationship Protocols (SRP). As noted in the Constabulary’s response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary’s response to calls for service. Due to issues with the assessment methodology and scope (above)</p>

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		<p>combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p> <p>Paragraphs 9.7.194 and 9.8.39 of Chapter 9 (Socio-economics) of the ES (APP-195) refer to the CSMP as relevant mitigation and state this will address safeguarding concerns through bi-lateral working, presumably involving and thus generating resource demands for the Constabulary. However, neither the Socio-economics Chapter nor CSMP explain how such concerns will actually be addressed.</p> <p>Paragraph 9.8.62 of Chapter 9 (Socio-economics) of the ES (APP-195) states that the Applicant will adopt a precautionary approach to manage community safety impacts, with a focus on prevention. The Constabulary welcomes this commitment but notes that effective implementation of the approach would require further additional resource funding for the Constabulary, beyond the minimum level required for incident response, enforcement and investigation, to also undertake pro-active work including additional community reassurance and deterrence patrols, targeted engagement with communities and intelligence gathering.</p>
<p>6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement Appendices – 9A (Workforce Profile) (APP-196)</p>	<p>SOCIO_3.1</p>	<p>The construction workforce has been estimated using databases of previous projects. However, no further evidence has been provided to explain this. Additionally, whilst the HB worker proportion appears to be based on percentage split this is not clear. Comparator developments are cited but no comparison of demographics, labour market or Study Areas is provided.</p> <p>Section 9.4.16 of Chapter 9 (Socio-economics) of the ES (APP-195) provides no explanation for the difference between the predicted maximum extent of daily travel in relation to non-home-based (NHB) workers of 60 minutes and the predicted Construction Daily Commuting Zone (CDCZ) for home-based workers defined as 90 minutes.</p> <p>Paragraph 1.3.7 of Appendix 9A of Chapter 9 (socio-economics) of the ES (APP-196) states the vast majority of Sizewell B workers commuted from within 35-mile radius although 50 miles (~90 mins) was the Sizewell B Study Area and has been rolled forward to SZC. The appendix fails to explain why 35 miles was not instead used as a cut-off for HB workers for SZC.</p> <p>These concerns undermine confidence in the predicted HB/NHB construction workforce split, which is important as any changes to this distribution could result in substantially different community safety impacts and associated policing mitigation requirements.</p>
<p>6.3 Volume 2 – Main Development Site – Chapter 9 (Socio-economics) of the Environmental Statement Appendices – 9B (Workforce Characteristics) (APP-196)</p>	<p>SOCIO_4.1</p>	<p>Appendix 9B of Chapter 9 (socio-economics) of the ES (APP-196) considers the possible demographic make-up of the non-home based (NHB) workforce to help inform the assessment of impacts on local accommodation, community facilities and public services. The baseline workforce characteristics presented are consistent with the Constabulary's demographics analysis, which indicates that the predominantly young-aged male workforce population is likely to alter the existing demographic profile within the local area (Leiston), resulting in a higher risk profile.</p> <p>The Constabulary considers that likely changes in population dynamics (changes in size <i>and</i> demographic profile) in Leiston and across Suffolk due to the introduction of the SZC workforce are likely to result in a range of additional community safety effects on the population (existing community and the workforce itself). Predicted per capita community safety and policing</p>

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		from the NHB workforce therefore need to be weighted to account for the higher than average community safety risk level associated with the predicted demographic profile of the construction workforce.
6.3 Volume 2 – Main Development Site – Chapter 27 – Major Accidents and Disasters of the Environmental Statement (APP-344)	SOCIO_5.1	Suffolk Constabulary welcome that this assessment includes consideration of socio-economic related major accident and disaster risks rather than focusing only on physical environmental risks. The Constabulary is however concerned that no consideration of potential cumulative risks associated with the introduction of SZC alongside Sizewell B has been undertaken. The Applicant should consider whether emergency preparedness and response for SZC would result in changes to existing plans for Sizewell B.
	SOCIO_5.2	Section 27.1.2 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) sets out the scope of the assessment but does not reference the specific requirement in Schedule 4, Paragraph 8 of the EIA Regulations to provide “ <i>details of the preparedness for and proposed response to such emergencies</i> ”. This is distinct from separate requirements to identify appropriate prevention and mitigation measures as it instead relates to mitigating major accident and disaster risks through preparedness rather than mitigating likely significant environmental effects through emergency response.
	SOCIO_5.3	There is no specific reference to emergency preparedness within the CSMP. Paragraph 5.2.18 of the CSMP (APP-635) merely defers consideration of emergency response protocols to be agreed by the Community Safety Working Group and set out in future Strategic Relationship Protocols. It is therefore not clear that emergency preparedness and response requirements, likely to include significant coordination and control duties placed upon the Constabulary, have been identified within the impact assessment.
	SOCIO_5.4	Suffolk Resilience Forum (SRF) takes lead on emergency planning and preparedness for the county. However, SRF’s plans place significant duties and responsibilities upon the Constabulary in terms of coordination and control. Emergency preparedness and response for SZC, including to deal with Major Accidents and Disasters (MA&D) risks, therefore generates resourcing and capacity issues for the Constabulary as well as for SRF.
	SOCIO_5.5	Table 27.4 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) appropriately identifies population and settlements within 5km of SZC as relevant environmental receptors. Leiston police station, fire station, GP surgery, utilities and B1122 access road identified as critical infrastructure receptors. 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 Applicant’s workforce and the population Suffolk more widely. The Constabulary has a critical role in the responding, management and mitigation role which extends to pro-active emergency preparedness and associated training alongside incident co-ordination, response and investigation. This will place additional resourcing demands on the Constabulary during the construction phase of SZC to discharge associated emergency preparedness and incident response requirements.
	SOCIO_5.6	Paragraph 27.2.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) omits the Constabulary’s 2017 Policing Plan (and any other relevant documents by the Constabulary) from the overview of relevant regional and local policy documents, meaning their implications have not been taken account of in the assessment. The Constabulary has a key role in MA&D preparedness and response so this should have been included.
	SOCIO_5.7	The absence of consideration of emergency preparedness requirements within the assessment means there is no assessment of emergency service resourcing or capacity to underpin the necessary preparedness or a major accident and disaster response. It is therefore not clear that emergency preparedness and response requirements, likely to include

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		significant duties placed upon the Constabulary with associated resourcing and capacity implications, have been identified within the impact assessment.
	SOCIO_5.8	The risk matrix which underpins the assessment presented in Table 27.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) assumes that the risk of civil unrest and protests “is not likely to result in serious damage”, meaning no further assessment or associated mitigation has been provided. The Constabulary disagrees with this assumption and protests are 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.
	SOCIO_5.9	<p>Paragraph 27.7 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) states the CSMP forms tertiary mitigation developed in response to the EIA assessment. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at specific risks and likely effects in order to constitute effective EIA mitigation. However, the CSMP does not do so as it defers to the Community Safety Working Group and individual future SRPs.</p> <p>As noted in the Constabulary’s response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary’s response to calls for service. Due to issues with the assessment methodology and scope (above) combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p>
	SOCIO_5.10	<p>Risk C36 (vandalism, crime and terrorism) is proposed to be mitigated through design, onsite security and fencing, drug and alcohol testing, and the SZC Worker Code of Conduct. Mitigation to address risk C36 appears to relate only to on-site prevention and response, rather than also off-site prevention of SZC related risks in the community. It also does not account for the Constabulary’s emergency response to calls for service (whether on or off-site) alongside SZC’s security team.</p> <p>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 Worker Code of Conduct sets out behavioural expectations, which is welcomed, there are significant issues when using it as an enforcement tool:</p> <ul style="list-style-type: none"> • If an individual commits a criminal act and is dealt with by the police, they do not have to disclose their profession. The Police would therefore be unaware that they work at SZC. • The Constabulary cannot disclose such information to SZC Co due to GDPR and the Applicant cannot apply for such information under the “Subject Access” route as the information sought is personal data to the individual. • There is ambiguity regarding how the Worker Code of Conduct will be applied to subcontractors. <p>Therefore, whilst the Worker Code of Conduct is welcomed as a useful tool to help mitigate community safety risks, it will be difficult to enforce and will not help to identify and report on SZC workers who come to the attention of the Constabulary. The Worker Code of Conduct is therefore likely to have only a very limited influence on reducing police resourcing demands arising from SZC.</p>
	SOCIO_5.11	The absence of consideration of emergency preparedness requirements within the assessment means there is also no assessment of emergency service resourcing or capacity to underpin the necessary preparedness or a MA&D response.

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		<p>Table 27.6 of Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) states that requirements for emergency preparedness are set out within the Code of Construction Practice (CoCP). This is misleading as Section 4 – Incidents & Emergencies of the CoCP only identifies the need for an Emergency Co-ordinator to be appointed, emergency contacts to be established and a SRP to be put in place rather than actually providing any substantive emergency preparedness information. There is also no consideration of interactions between Sizewell B and SZC emergency planning or preparedness.</p>
<p>8.16 Community Safety Management Plan (CSMP) APP-635</p>	<p>SOCIO_6.1</p>	<p>Chapter 9 (Socio-economics) of the ES (APP-195) and Chapter 27 (Major Accidents and Disasters) of the ES (APP-344) both identify the Community Safety Management Plan (CSMP) (APP-635) as tertiary mitigation developed in response to the assessment of likely community safety and other relevant effects. This emphasises the need for the CSMP to contain measurable and deliverable actions targeted at addressing specific likely effects in order to provide effective EIA mitigation. However, although paragraph 1.1.10 of the CSMP (APP-635) states that a key role of the CSMP is to establish governance arrangements and ways of working to address community safety impacts, these are not then set out. Instead, the CSMP defers to the Community Safety Working Group and future Strategic Relationship Protocols to be agreed with each emergency service. Proposed mitigation measures are not robustly evidenced and have not considered any indicator beyond recorded crimes.</p> <p>As noted in the Constabulary’s response to Written Question HW1.18 at Deadline 2, the SRP is not a legally binding document and nothing within it will or can override established Police procedures and policy, including with regards to the Constabulary’s response to calls for service. Due to issues with the methodology and scope of the Applicant’s assessment of crime and policing impacts combined with a lack of specificity within the CSMP it is difficult to determine whether the mitigation referenced in the CSMP will be effective in avoiding significant adverse community safety impacts.</p>
	<p>SOCIO_6.2</p>	<p>Paragraph 1.1.7 of the CSMP (APP-635) refers to Chapter 9 (Socio-economics) of the ES (APP-195) for the “formal assessment of socio-economic impacts” of relevance to community safety, yet as discussed above many of the identified community safety risks and concerns which are listed within the CSMP, and associated policing impacts, have not been formally assessed within Chapter 9 (Socio-economics) of the ES (APP-195).</p> <p>Paragraph 1.1.8 of the CSMP (APP-635) states that the CSMP identifies community safety related “issues and potential impacts” to manage and mitigate. However, the CSMP simply draws upon the limited assessment information presented in the ES and does not provide any additional assessment of effects. The CSMP does not provide any detail or a framework through which likely significant effects will be effectively mitigated and monitored. In many cases, potential effects appear to be simply dismissed, including points made by the Constabulary in pre-application consultation responses.</p>
	<p>SOCIO_6.3</p>	<p>Paragraphs 1.1.6 and 5.2.2 of the CSMP (APP-635) lists 9 predicted “risks” from the SZC construction workforce and traffic as “identified through a broader risk assessment.”. However, no further explanation of this process has been provided and the identified risks are not examined beyond identification in a bullet point list. As such, the absence of an impact assessment of these risks means that it is not clear what specific mitigation to address them is required and whether the proposed mitigation will be adequate and effective.</p>
	<p>SOCIO_6.4</p>	<p>Paragraph 2.2.6 of the CSMP (APP-635) notes that the Constabulary is undertaking modelling using the Applicant’s data to assess potential changes in number and type of incidents to determine resourcing requirements, whilst paragraph 5.2.35 states that the Applicant is working with the Constabulary “to anticipate potential effects”. However, the text does not confirm whether or how this has been taken account of in the impact assessment presented by the Applicant or if it is intended to fill</p>

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		<p>assessment gaps. The text is therefore misleading as it implies the Constabulary has supported the impact assessment undertaken by the Applicant, rather than undertaking its own analysis to address significant deficiencies within the Applicant's assessment.</p> <p>Similarly, paragraph 2.1.1 of the CSMP (APP-635) is misleading as it indicates the CSMP has been developed through a programme of workshops and bilateral meetings with service providers, yet the Constabulary was not invited to and has not contributed to the document.</p>
	SOCIO_6.5	<p>The CSMP makes reference to points raised by the constabulary regarding the limitations of recorded crimes as the sole indicator of police resourcing, stating: <i>“SZC Co. recognises through engagement with Suffolk Constabulary, that recorded crimes (the metric used in this assessment) are only one contributor towards police resourcing, and that information on response to non-reported incidents and dealing with crimes not categorised by the Home Office definitions can lead to greater demand for police resourcing”</i>. However, this is not taken any further and the identified limitation has not been overcome within the assessment of crime and policing effects presented within Chapter 9 (Socio-economics) of the ES (APP-195).</p>
	SOCIO_6.6	<p>Table 3.1 of the CSMP (APP-635) correctly identifies the role and priorities of the Constabulary with reference to the 2017 Policing Plan and its 4 constituent objectives. Also notes that Leiston SNT has specific priorities to deal with mental health & vulnerable people, anti-social behaviour and domestic violence. However, Table 3.1 of the CSMP (APP-635) does not provide a full community safety and policing baseline. This text was not provided by or agreed with the Constabulary.</p> <p>It is disappointing that the 2017 Policing Plan objectives and Leiston SNT 4 priorities have been identified in the CSMP but not in the impact assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195). The EIA should have assessed the extent to which SZC would be likely to affect the delivery of the policing objectives and priorities, starting with available baseline information regarding the objectives and priorities before considering how SZC is likely to interact with these. If this had been undertaken, even qualitatively, it would have resulted in a more robust community safety impact assessment and allowed for more specific mitigation to be identified.</p>
	SOCIO_6.7	<p>At paragraph 4.3.2 of the CSMP (APP-635), the demographic profile of construction workforce is not compared with the existing population, resulting in a lack of consideration of community safety impacts from predicted changes in the demographic profile of Leiston and Suffolk more widely. Paragraph 5.2.81 of the CSMP (APP-635) references a likely change in population dynamics due to SZC construction workforce but does not elaborate on associated community safety impacts. The section also does not account for deprivation within Leiston.</p>
	SOCIO_6.8	<p>No evidence is presented to examine the “broader risks” to community safety listed at paragraph 1.1.6 of the CSMP (APP-635) in any detail. Furthermore, there has been no attempt to identify the level and EIA significance of identified likely safety risks/effects on the community (as a receptor) rather than on public service resourcing demands. This means there is also no robust evidence to identify the adequacy or effectiveness of specific mitigation proposals.</p> <p>The Constabulary considers that all of the listed community safety impacts and risks are 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. It is therefore unfortunate that the crime and policing assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195) does not take account of these wider community safety impacts, instead focusing solely on a per capita based calculation of % change in recorded crime.</p>

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	SOCIO_6.9	Paragraph 5.2.30 of the CSMP (APP-635) acknowledges that whilst increases in demand for public services should be met by central government funding, this does not allow for changes due to short term migration. In consequence, additional funding to accommodate increased service demands due to SZC will be needed. Existing police funding mechanisms (Council tax and Home Office grant calculated on a per capita <i>resident</i> basis using ONS data) will not capture much of the Non-Home Based (NHB) SZC workforce residing in temporary accommodation, meaning that without adequate additional funding being provided by the Applicant, policing services for this component of the workforce would be unfunded.
	SOCIO_6.10	<p>The claim at paragraph 5.2.47 of the CSMP (APP-635) that the predicted increase in recorded crime as a result of the SZC project (based on data from HPC) may be an “over-estimate” is not supported by evidence and should be disregarded. The assessment undertaken by the Applicant is deficient as there is consideration of wider community safety impacts beyond recorded crime and no acknowledgement of differences in geographical, demographical, socio-economic and policing contexts between HPC and SZC.</p> <p>As detailed in Part 2 of the WR, 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 impacts from the SZC project, owing to known weaknesses with this data including under-reporting and as the assessment of likely impacts and the development of associated mitigation must be based on data directly applicable to the geographical, socio-economic, policing and demographic contexts of the SZC project in Suffolk.</p>
5.1 Consultation Report (APP-068)	SOCIO_7.1	<p>The Consultation Report (APP-068) provides an account of the consultation activities undertaken by the Applicant and explains how the consultation responses received have been taken into account. However, the Constabulary does not consider that key matters raised in its responses to the Applicant’s pre-application consultation exercises have been adequately addressed in the preparation of the DCO application.</p> <p>As mentioned in its Relevant Representation (RR-1140), the Constabulary has consistently raised the following key matters with the Applicant:</p> <ol style="list-style-type: none"> 1. Narrow scope of assessment - the singular focus of the policing impact assessment on recorded crimes is inadequate. Whilst the CSMP calls for the Constabulary to play an active role in managing community safety, which is to be welcomed, no consideration is given to the associated assessment of wider community safety impacts requiring police involvement (whether in terms of emergency preparedness, prevention, deterrence, safeguarding, incident response or investigation). The role of for the Constabulary in addressing community safety impacts beyond recorded crime should have been recognised and addressed; 2. Limited consideration of demographic risks – the published assessment of effects on population dynamics does not appear to have been factored into the assessment of policing impacts, as this only considers crime impacts quantitatively on a per capita basis. Coupled with the narrow scope of assessment, it is therefore difficult to determine whether the mitigation proposals set out in the CSMP will be effective in avoiding significant adverse community safety impacts; and

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		<p>3. Insufficient information regarding the range of potential transport impacts likely to require a net additional police response.</p> <p>Consequently, the Constabulary considers there to be gaps in the assessments of community safety and policing impacts which the Applicant should address in the Examination.</p>
5.13 Community Impact Report (APP-156)	SOCIO_8.1	The Community Impact Report provides an overview of the proposed effects of the SZC Project on the local communities in six defined local areas. It is noted that the Community Impact Report considers the effects on communities across the following spatial areas; Leiston ward area, Yoxford ward area, Saxmundham ward area, Aldeburgh and Snape wards area, East Suffolk district and five neighbouring districts, as the Applicant determines these areas as the most likely to be affected by the SZC Project. However, given the likely geographical spread of the construction and operational effects, these areas are considered inadequate. The Constabulary queries why wider sub-regional effects at county level have not been considered.
	SOCIO_8.2	It is noted that the Community Impact Report “draws on the information set out in the Development Consent Order application including the technical assessment of effects”, in particular the impacts assessed in the Environmental Statement (ES). However, due to the deficiencies in Chapter 9 (Socio-economics) of the ES (APP-195), the Constabulary is concerned that the Community Impact Report, as currently drafted, does not fully assess some community risks/effects and there is at risk of selective reporting.
	SOCIO_8.3	Section 2.4.8 of the Community Impact Report explains how Suffolk’s Hidden Needs Report identified pockets of high levels of deprivation and disadvantage across Suffolk that is not reflected in national statics and confirmed that areas around Leiston are “some of the most deprived in Suffolk”. However, the Applicant fails to elaborate on this in the Community Impact Report nor consider this in the crime and policing impact assessment presented within Chapter 9 (Socio-economics) of the ES (APP-195).
	SOCIO_8.4	It is estimated that there would be a peak of 3,634 additional construction workers within the locality of Leiston. Section 2.6.30 states that “this change in population would be a significant change in Leiston, although it is not possible to assess whether it would be a beneficial or an adverse effect”. The Constabulary considers this a weak position and makes it unclear what likely significant adverse effects need to be mitigated. Therefore, it is difficult for the Constabulary to determine the effectiveness of the proposed mitigation measures.
	SOCIO_8.5	Positively, at Section 2.6.34 of the Community Impact Report, the Applicant acknowledges that liaison with the emergency services is required to develop and monitor the mitigation measures proposed. The Applicant also identifies a need for financial contributions to the emergency services via Section 106 agreements to help develop and monitor the Community Safety Management Plan (CSMP). Whilst the Constabulary welcomes the mitigation measures listed under Section 2.6.34, the Applicant does not explain what the likely impacts are which trigger mitigation requirements or why the specified measures will be adequate and effective in addressing likely community safety impacts. There is therefore no clear and objective basis upon which to define and agree appropriate financial contributions and mitigation measures required.
5.14 Equality Statement (APP-158)	SOCIO_9.1	The Equality Statement considers the potential effects on equality as a result of the construction and operational phases of the Sizewell C Project. It is noted that the scope of assessment presented in the Equality Statement “has been informed by a review of the effects identified in the application documents, and a comparison with the equality assessments made of

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		<i>other DCO applications</i> ". The Constabulary is therefore concerned that the Equality Statement suffers from the same deficiencies as Chapter 9 (Socio-economics) of the ES (APP-195). Furthermore, there is no consideration within the methodology of the influence of existing deprivation of Leiston on community safety impacts or potential interactions with SZC workforce.
	SOCIO_9.2	The baseline, presented at Section 1.4 of the Equality Statement, focuses entirely on demographics and protected characteristics. There is no consideration of wider socio-economic issues, including income/wealth inequality or existing deprivation in Leiston. Furthermore, Section 1.6.66 notes that young men are on average more likely to be a victim of crime but does not acknowledge increased risk of perpetration. The combined higher risk profile of the construction workforce demographic is not recognised and has not been factored into the assessment of crime and policing impacts presented within Chapter 9 (Socio-economics) of the ES (APP-195).
	SOCIO_9.3	As drafted, the Equality Statement does not outline any specific mitigation to address the identified likely differential impacts on persons with protected characteristics. Rather, the Equality Statement relies on general mitigation proposed in other documents.
Accommodation Strategy (APP-613)	SOCIO_10.1	Paragraph 2.5.2 of the Accommodation Strategy advises "the existing population is relatively dynamic and mobile" and cites 4% annual net immigration estimate for Suffolk. However, no comparison with national or other regional averages have been provided and there is no acknowledgment of the relatively rural and ageing demographics characteristics of Suffolk. The strategy also fails to consider future baseline conditions (demographics, housing needs or temporary accommodation provision within NHB catchment or local wards).
	SOCIO_10.2	No consideration given to the impacts of COVID-19 on continued provision of and demand for tourist accommodation. The Applicant should confirm whether its assumption of 800 workers being accommodated by this sector is still valid. The Constabulary are concerned that if this assumption has changed then this would increase demand for other sources, which could have impacts on community safety and policing.
	SOCIO_10.3	<p>Paragraph 5.1.3 of the Accommodation Strategy outlines the predicted benefits of worker campus accommodation, with reference to HPC, but fails to address the known issues including poor wellbeing and mental health incidents that have occurred at HPC. These known issues, including mental health calls and mental health related incidents could give rise to several community safety impacts which would require policing involvement to mitigate.</p> <p>The Accommodation Strategy provides no explanation of how the SZC accommodation campus differs or would learn lessons from the HPC experience. The Constabulary has routinely explained to the Applicant that their over-reliance upon data collated from the HPC project is flawed.</p>
	SOCIO_10.4	<p>The Accommodation Strategy makes reference to the Worker Code of Conduct as a community safety mitigation measure. 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 Worker Code of Conduct sets out behavioural expectations, which is welcomed, there are significant issues when using it as an enforcement tool:</p> <ul style="list-style-type: none"> • If an individual commits a criminal act and is dealt with by the police, they do not have to disclose their profession. The Police would therefore be unaware that they work at SZC. • The Constabulary cannot disclose such information to the Applicant due to GDPR and the Applicant cannot apply for such information under the "Subject Access" route as the information sought is personal data to the individual.

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		<ul style="list-style-type: none"> There is ambiguity regarding how the Worker Code of Conduct will be applied to subcontractors. <p>Therefore, whilst the Worker Code of Conduct is welcomed as a useful tool to help mitigate community safety risks, it will be difficult to enforce and will not help to identify and report on SZC workers who come to the attention of the Constabulary. The Worker Code of Conduct is therefore likely to have only a very limited influence on reducing police resourcing demands arising from SZC.</p>
	SOCIO_10.5	Existing police funding mechanisms (Council tax and Home Office grant calculated on a per capita <i>resident</i> basis using ONS data) will not capture much of the Non-Home Based (NHB) SZC workforce residing in temporary accommodation, meaning that without adequate additional funding being provided by the Applicant, policing services for this component of the workforce would be unfunded.

2.2 Transport related comments

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6.3 Volume 2 – Main Development Site – Chapter 10 (Transport) of the Environmental Statement (APP-198)	TRA_1.1	The assessment follows relevant IEMA guidance on scope and methodology. It considers the potential effects of severance, pedestrian delay, amenity, fear and intimidation, driver delay, accidents and safety and hazardous loads. All of these are pertinent to Community Policing matters.
	TRA_1.2	The Applicant's assessment of impacts relies on a range of commitments to construction and operational processes which will need to be adhered to meet the reductions in impact asserted to within the documents (e.g. commitments to maximum vehicle movements at periods in the construction; the management of vehicles and materials and the scheduling and management of Abnormal Indivisible Loads (AILs), etc)
	TRA_1.3	<p>The Constabulary does not contest the following core assumptions of this chapter:</p> <ul style="list-style-type: none"> • Method of appraisal and the geographic focus of the assessment • Legislative, policy and guidance base • Assessment scenario years and windows • Criteria for receptors, magnitude of impact and classification of effects • Description of the existing study area and the review of base data • Predictions of growth and generated vehicles (with the exception of AILs – which are not covered in this chapter) <p><i>The Constabulary does not take a view on the propensity of mitigation measures to resolve capacity or network operation impacts either during construction or operation of the project. This position is deferred to the affected Local Authorities.</i></p> <p>The Constabulary raises concerns about the capability of elements of the proposed mitigation to allow the safe and efficient operation of large construction vehicles and AILs e.g. the routing of large vehicles at the proposed junctions on the proposed Sizewell Link Road and the movement of AILs along the access corridor without Constabulary intervention or assistance. These concerns have been raised with the Applicant and are documented on the 'Comments Register' between the Constabulary and the Applicant.</p>
	TRA_1.4	The Constabulary is not in agreement with the prediction, programming and management of AILs associated with the construction period. AILs have been assumed to use the network out of the scenario periods within the ES and are therefore not scoped into the ES. In the interest of public safety and the safe and efficient operation of the road network, the Constabulary is in agreement with this working assumption and will work with the Applicant better to predict the movement of AILs, to programme their movement and manage how those movements are made.
	TRA_1.5	The Constabulary is concerned that large vehicles cannot pass each other safely along B1122 and seeks commitment from the Applicant on how it will manage the safe operation of that route during the life of the construction project. Even after construction of the SLR, the B1122 is to be used for construction traffic arriving from and departing to the north of Yoxford. Aside from committing to a cap on the number of HGVs accessing the main worksite, the Applicant must demonstrate how it will protect the safe and efficient operation of that route. Currently, the Applicant does not propose to include the Constabulary within the Transport Review Group (TRG). The Constabulary is therefore reliant on other mechanisms to feedback to the Applicant about the on-going monitoring and management of the network and the effectiveness of the measures committed to.

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	TRA_1.6	The Constabulary is concerned that this chapter does not fully reflect the severance and fear and intimidation that the change in quantum of HGV traffic will have on the movement of vulnerable road users across the access corridors e.g. across A12 at Little Glemham, within Leiston or at PROWs along the corridor.
	TRA_1.7	The criteria set out in the ES specify large magnitudes of change before a major adverse impact is deemed to be generated and as such the significance of the changes are often determined not to require substantive or robust mitigation. For example, the Applicant has relied on speed limit changes to mitigate effects on B1122 and impacts on cycling and walking, without evidence as to how those limits would be self-enforcing and therefore their effectiveness is questionable. The Applicant proposes funding through a s106 agreement to create mitigation within Leiston, to address impacts on walking and cycling severance and delays, however, the Applicant does not explain how that funding would mitigate the effects. The Constabulary has raised concerns with the Applicant over the rigour of the proposed mitigation and works with SCC to maximise the effectiveness of measures and initiatives.
	TRA_1.8	The ES relies on the assessment of accidents and road safety provided in the Transport Assessment (TA) and professional judgement as to the magnitude of effect. The Applicant asserts that there are no major adverse effects assumed to be created during the construction or operation of the Project. Greater detail on the accident analysis is appraised in the review of the TA and in context with the Constabulary's own assessment of roads policing and safety impacts (refer to WR Part 2).
	TRA_1.9	The access and movement effects from construction traffic would be managed by implementing off-site infrastructure (e.g. Two Villages Bypass, the Sizewell link Road, Freight Management Facility and Park and Ride sites) and a series of management plans: <ul style="list-style-type: none"> • Construction Traffic Management Plan (APP-608), • Construction Worker Travel Plan (APP-609) and Traffic • Incident Management Plan (APP-607). <p><i>The Constabulary requests certainty over mitigation which are integral to reducing burdens on community policing and network safety and operations. Included with that mitigation are the reductions in movements by road for materials, equipment and AILs such as the Beach landing facility and Rail upgrades. The Constabulary has prepared a Comments' Register and a Roads Policing and AIL Impact Assessment which sets out its concerns with the evidence, assessment and proposed mitigation and management. The mitigation is currently insufficient for the management of AILs and there are detailed queries about the viability and feasibility of aspects of the mitigation measures, as proposed.</i></p>
8.5 Transport Assessment (APP-602)	TRA_2.1	Whilst policing issues are not directly covered in the Transport Assessment (TA), the transport impacts assessed within the TA will have a direct impact on policing issues. i.e. the number of HGV / AILs and cars forecasted to be generated and where and when these are assigned on the local road network and at which of the identified sites and facilities.
	TRA_2.2	The TA does not recognise fully the impacts on community policing and enforcement that the Constabulary anticipate would be generated during the construction period. The Constabulary is particularly mindful that predictions for AIL movements and the management of those loads are not addressed adequately within the TA and other evidence.
	TRA_2.3	The HGV traffic movements modelled in the early years and peak construction 'busiest day' 'With Sizewell C' scenarios were based on the HGV movement limits within the Construction Traffic Management Plan (CTMP) (APP-608). No more than 600 movements (300 deliveries) in the early years and 1,000 movements per day (500 deliveries) in the peak construction phase. Whilst these are robust assumptions the movements are predicted to be greater than 1 movement per minute at peaks in each direction along roads and at

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		junctions. There is concern that this flow will create congestion at gate lines and cause disruption and danger at those points on the network.
	TRA_2.4	Predictions of AIL movements have been developed by the Applicant solely based on the limited relevant information contained within the TA. The Constabulary has previously expressed significant concerns about the programming, management and monitoring of the AIL movements and how those activities will draw on Constabulary resources during the construction period.
	TRA_2.3	The TA methodology and results of the assessments inform the mitigation which the Applicant has developed. Proposals for off-site mitigation (e.g. Sizewell Link Road, Two Villages' Bypass, Freight Management Facility and Park and Ride sites) are proposed to help mitigate some of the effects of increased traffic flow and the associated increase in HGV traffic. The Constabulary has sought clarity about certain details of the proposals, to help understand how the new infrastructure will operate and the need for Constabulary resources to manage and enforce the legal use of that infrastructure (e.g. movements which are required to contravene regulation whilst travelling to or from the worksites)
	TRA_2.4	Future baseline includes committed growth and sensitivity test around Scottish Power proposals. However, influence of Highways Englands proposals / works at Copdock A12/A14 interchange have not been taken into account in the assessment and interaction with build period. Further proposed schemes should be reflected such as Highways England's proposals for the dualling of A12 Woodbridge / Seckford Hall to B0179.
	TRA_2.5	<p>The Constabulary is concerned about the:</p> <ul style="list-style-type: none"> • appraisal of impacts of the movement of AILs during the construction phases; • mechanisms by which the Applicant proposes to engage with the Constabulary during the construction of the Project; • methods of management of the gate line to the worksite, and how that will not disrupt the safe and efficient operation of the adjoining road network; and • detail of the off-site mitigation and how that will be used safely and efficiently and without the need for intervention by the Constabulary. <p>The Constabulary defers to Suffolk County Council (SCC) to reach agreement with the Applicant over the principal assumptions on access and movement that are taken as part of the evidence base, where these do not affect the community policing and the Constabulary's resources.</p>
	TRA_2.6	<p>The assessment of network impacts has been undertaken using both macro strategic modelling on a broad network with reassignment viable within the network for background traffic and on a more local basis (VISSIM) without network reassignment but with a range of third-party mitigation (Brightwell Lakes) at junctions along the A12 corridor. The assessment of peak period network operation indicated no major deterioration in congestion and delays, however, sensitivity analysis has not been carried out of the effects of that third-party mitigation not being realised or the absence of reassignment within the strategic model. A sensitivity scenario should also be considered to assess the effects on the network of slow moving AILs and the resultant residual effects on the network during the following peak period. The Constabulary defers to SCC for the approval of the assumptions taken by the Applicant in its evidence and assessment. However, the Constabulary has reservations about the appropriateness of network reassignment and the certainty of realising the third-party mitigation.</p> <p>The Constabulary has requested that the Applicant considers carrying out sensitivity testing.</p>

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	TRA_2.7	<p>The Constabulary defers to SCC to determine the suitability of proposed mitigation to resolve the adverse effects of the Project on the road network during construction and operation. The Constabulary does have concerns with some details of the mitigation including the management of construction traffic, particularly AILs, and the layout of that mitigation register.</p> <p>Mitigation measures are proposed and detailed in the Applicant’s Implementation Plan (APP-599) and TA. The Applicant is proposing to implement or provide a contribution to fund road safety improvements on the B1078 corridor at the A140/B1078 junction west of Coddendam and on the B1078 in the vicinity of Easton & Otley College to mitigate potential highway safety issues. The Constabulary notes proposals for on-going engagement during the construction period but it has concerns that the mechanism does not allow for adequate engagement.</p>
8.6 Traffic Incident Management Plan (TIMP) (APP-607)	TRA_3.1	<p>The Traffic Incident Management Plan (TIMP) forms part of a package of transport management documents to assist in the control of transport movements for the Project. The Constabulary agrees with the principles but does not consider that policing issues have been sufficiently covered in the draft TIMP.</p>
	TRA_3.2	<p>The TIMP does not provide a robust basis to plan for incidents. The TIMP recognises the role of the statutory bodies, including the Constabulary, but does not provide a framework from which to manage the network. The Constabulary has advised the Applicant that a scenario matrix of predictable incidents should be prepared and considered in partnership with the Constabulary and Suffolk County Council Highways and Highways England to refine the planning for those incidents. This should be done prior to consent and not left to later agreement.</p>
	TRA_3.3	<p>The Applicant proposes ad hoc engagement of the Emergency Services in the Transport Review Group for the development of the TIMP. It is the Constabulary’s opinion that this is not sufficient, and the Constabulary should be represented as a regular member of any monitoring and management groups.</p> <p>The Transport Review Group (TRG) would monitor progress associated with the TIMP; apply the Transport Contingency Fund and amend the TIMP, as required. Clarification is required regarding the magnitude of the Transport Contingency Fund and how it will be applied</p>
	TRA_3.4	<p>The Constabulary has a duty to manage the safety of the road network and its users during times of incident. This function is carried out in collaboration with SCC and Highways England. Those organisations would work with the Applicant and its contractors to help safely to regain construction operations as quickly as appropriate following an incident. The TIMP should further identify the procedures for managing planned or foreseen events, such as the temporary closure of the Orwell crossing or planned closures of the access routes for maintenance or on-line construction works.</p> <p>The Constabulary should also be engaged in the approval of the final TIMP as the process would affect the Constabulary’s resources during the management of incidents, and also the Constabulary will influence the way that incidents are managed, and operations returned to business as usual. The Constabulary is very aware of the need to manage and potentially close the A12 corridor during major incidents and the impacts that will have on the construction process. It is therefore important that the Applicant works with the Constabulary to refine procedures and mitigate the impacts of incidents.</p>
	TRA_3.5	<p>Community policing in relation to incidents is both reactive and can be proactive. Where possible the reactive nature of incident management should be scenario tested. This planning and testing can assist with responding to incidents, including the Community focused element of policing e.g. responding to public concerns. The Constabulary is not confident that the Applicant has sufficient measures or procedures identified or in place within the current draft of the TIMP to allow the effect management of the effects on incidents and the draft TIMP should be revised to strengthen the framework to form the Certified Document in preparation for the development of the agreed TIMP.</p>

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	TRA_3.6	By their nature incidents are generally unplanned, however, predictions for likely incidents; risk appraisals and contingency plans of those incidents can help to reduce the reactive needs and assist with planning for those eventualities. The draft TIMP includes indications of a series of planned and unplanned incidents and events for which the basic communications channels are stated, and the headline management measures are set out. Better planning will help to refine the effects on community policing and allow for better resource management. The Constabulary is identified as a stakeholder for the TIMP. It is the Constabulary's view that they should be a formal representative in the refinement of the final agreed TIMP and the on-going monitoring, management and review. The Constabulary is a fundamental partner in the management of incidents and events on the road network and should therefore be more heavily involved and not just consulted on what is to be agreed.
	TRA_3.7	The control mechanisms within the draft TIMP rely heavily on contractors and hauliers conforming to the predetermined procedures, where vehicles are redirected or curtailed at off-site facilities or prior to departing their origin depots. Further detail is required about the systems for communicating altered access plans in the live situation and how that will affect HGV access to the off-site facilities and the main works site. These systems will need to be reviewed during the construction period to ensure they are working acceptably.
	TRA_3.8	The Applicant indicates in the draft TIMP that under set circumstances construction related HGVs would be held at the Park and Ride sites. It is stated that the details of how many vehicles and how those vehicles would be managed within those sites are yet to be determined. The suitability to accommodate those vehicles in those locations is key to the viability of the strategies within the TIMP. The Applicant should provide further evidence within a revised draft TIMP, prior to consent.
	TRA_3.9	The TIMP should include a matrix of contingency scenarios to guide the better management of incidents and the preparation for diversion routes and temporary management. This contingency planning would reduce the reactive nature of the document for all project related travel not just HGVs. The contingency fund proposed in the Head of Terms of the s106 agreement is noted and should be refined to reflect the scenarios appraisals and where mitigation could be applied to facilitate the operation of the TIMP. The Constabulary would be happy to work with the Applicant, SCC and Highways England to refine the contingency planning – including reviewing current diversion routes.
	TRA_3.10	The management processes and groups; the mechanisms for control and communication; and the incident contingency planning are not considered adequately advanced in the draft TIMP. These need to be strengthened and amended. The review should include consideration of likely incidents and the preparation of contingency plans to cater for operations during those incidents and the recover periods after the incidents - such as temporary amendments to working hours and HGV traffic profiling relative to the agreed caps on movements.
	TRA_3.11	The assertion that the finalised TIMP will be developed post-consent is not accepted by the Constabulary. Rather the TIMP should be developed during the DCO Examination and concluded prior to consent. The Constabulary respectfully requests that the TIMP, CTMP, CoCP and CWTP are certified document in the DCO.
8.7 Construction Traffic Management Plan (CTMP) (APP-608)	TRA_4.1	The Constabulary is in general support of the principle of a CTMP as it should help to manage the impacts of construction traffic. However, as currently drafted the CTMP falls short of the details required to be agreed. These include: <ul style="list-style-type: none"> • Further detail on AILs required; • Inclusion on the working and monitoring group; Assurances over the implementation of the associated mitigation (two villages bypass etc).
	TRA_4.2	It is assumed that the 'construction period' covered in the CTMP includes site establishment, enabling works and demobilisation periods. However, clarification from the Applicant is required.

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	TRA_4.3	The draft CTMP makes no reference to the need for new and amended Traffic Regulation Orders that could be required to assist with the operation of the network and the role the Constabulary would play in the refinement and determination of those.
	TRA_4.4	No reference is made to how the measures proposed within the CTMP will affect the communities along the defined access routes and other communities proposed to be protected from construction traffic e.g. Saxmundham and Leiston. Indications of sums to address road safety impacts in these settlements are made within the TA, however, details of the remedial measures are not set out and are left to Suffolk County Council to apply the funding through a s106 Agreement.
	TRA_4.5	The assessment of AIL numbers and the resultant draw on Constabulary resources is not sufficiently set out and quantified within the CTMP. The CTMP does not specify the temporary traffic management measures which could be required on local roads to facilitate the movement of AILs or the management of traffic associated with the construction period – such as waiting and loading restrictions. A set of proposed speed limits is included in the Schedules of the draft DCO but not carried forward into the CTMP.
	TRA_4.6	<p>Policing issues and the resource requirements of the Constabulary are not fully covered in the draft CTMP. The draft CTMP identifies the general role of the Constabulary in 'assisting' with the escorting of AILs and the standard notice period for these. However, it does not reflect the specific importance of the movement of AILs associated with this project and the increased management that the Constabulary require to help safeguard the operation of the network.</p> <p>The Constabulary will require robust coordination of the movement and management of AILs into and away from the Project and co-ordination with other non-Project related AILs. This will require:</p> <ul style="list-style-type: none"> • Trained police resources to escort all AILs (wide, over-weight and long) e.g. at North P&R site access roundabout - the CTMP and CoCP must reflect this. • Require AIL predictions to be more refined and include mobile cranes, ballast, and switch outs – this planning will require a defined process in the CTMP that can be flexible to reflect programme change and design refinement. The process will be more robust than the standard notice periods. The process should reflect the need for co-ordination with at grade rail crossings (e.g. Yoxford Road) and the confirmation of the suitability of those crossings and other structural / layout restrictions. Details of the AIL movements at Hinkley Point C would be reviewed and categorised to inform the strategy for AIL management. • Seek contingency planning around the BLF being unavailable (e.g. due to adverse weather) and for a contingency access strategy to be defined for access to the works site at that time. This should be noted in the CTMP and set out in the TIMP.
	TRA_4.7	<p>The Constabulary has network management and enforcement duties. The following points should be reflected in the CTMP:</p> <ul style="list-style-type: none"> • The inclusion of the Constabulary within monitoring and review processes, and planning for events/movements, such as representation on the TRGs to allow for better planning and review. • The planning for peak period events such as major pours or extractions. <p>Details on the management and enforcement of construction traffic routeing and compliance with network legislation (e.g. speeds, obstruction) and expanding on the mention of ANPR or the emerging use of GPS. Thus, it should include detailing which contractors and hauliers will be covered by those initiatives.</p> <p>If further iterations of the CTMP do not adequately address the Constabulary's concerns, there is the likelihood that disruptions to the network due to poorly planned road movements; poorly managed route operations; increased road traffic collisions; and traffic law transgressions will be increased. This could result in delays to the construction programme; added costs and a negative image for the project.</p>

Application Document	SC Ref	Suffolk Constabulary Comments
	TRA_4.8	<p>Mitigation measures presented in Section 4 of the CTMP provide a good basis for further iterations of the draft CTMP and subsequent detailing within the final approved CTMP. However, the Applicant needs to extend the robustness of the draft CTMP so that it is not implicitly reliant on schedules in the DCO or other statute and guidance. The CTMP needs to provide more detail on the traffic management strategy and planning, including:</p> <ul style="list-style-type: none"> • Reflecting the draft DCO Schedule 14 ‘Traffic Regulation Measures’ needs to include waiting and loading restrictions required as well as the speed restriction changes. The full schedule should be reflected in the CTMP; • The governance process for TTROs and permits etc, HGV management and profiling; LGV compliance (including how to enforce the use of non-strategic roads) • The management of temporary and permanent traffic management measures; • The management of vehicles approaching and leaving the area – to ensure there is no waiting in surrounding roads or overnight; • The driver and haulier compliance requirements e.g. safer drivers, safer vehicles; and • The management of the use of the LEEIE within the system – reflecting how this will be co-ordinated within the DMS/VBMS; • Explaining the realism of managing HGVs away if incidents occur – including how this could be realised with typical travel times greater than the notification of incidents; and • How the Applicant will manage the scale of movements across the construction programme and across the various contractors.
8.8 Construction Worker Travel Plan (CWTP) (APP-609)	TRA_5.1	<p>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.</p>
	TRA_5.2	<p>The CTWP should promote and actively encourage safe and sensible travel behaviours and the respect for regulation. The draft document is weak on this front and should be strengthened prior to consent of the DCO.</p>
	TRA_5.3	<p>Measures for mitigation are listed in Section 4 of the draft CWTP. These are extensive and it is recommended the policing implications for these are understood. Specifically:</p> <ul style="list-style-type: none"> • Policing required for two new park and ride facilities which will both have 1,250 parking spaces; • Proposed road safety improvement schemes ; and • Fly parking control.
	TRA_5.4	<p>It is recommended that periodic reviews of measures are undertaken in consultation with the Constabulary to better understand policing implications. The Constabulary should be involved in reviewing and managing the CWTP to reflect community engagement and other parallel safety initiatives.</p>