



Your Ref: EN010012
Our Ref: 20026016

03 September 2021

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

BY EMAIL ONLY

Dear Wendy,

**SIZEWELL C PROJECT
RESPONSE TO EXAMINATION DEADLINE 7**

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

On behalf of the Constabulary, I am pleased to submit a response to Examination Deadline 7. The Constabulary’s submission comprises the following:

- i. This covering letter, which sets out the Constabulary’s current position and arrangements for Issue Specific Hearings 11 to 14
- ii. Appendix A – Summary of Suffolk Constabulary’s Policing Mitigation Requirements
- iii. Appendix B – Response to the Examining Authority’s Written Questions (ExQ2)

The Constabulary’s Position

The Constabulary has reviewed the Applicant’s Deadline 6 Submission and does not consider that its concerns raised in previous submissions and at the Issue Specific Hearings 1 to 4 [REP5-168] have been adequately addressed.

In recent correspondence to the Applicant, the Constabulary set out its current position and the policing mitigation measures required in respect of the construction phase of

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the proposed scheme. This correspondence is enclosed with Appendix A of this letter. The Constabulary reiterated that its mitigation requirements extend beyond simply the agreement of adequate funding to cover four interlinked principles:

1. Mitigation must be compatible with the Constabulary's operational model and appropriate to the context of the proposed scheme in Suffolk. This includes basing Local Policing resources in Leiston. Notwithstanding disagreements regarding modelling, the Constabulary has undertaken a detailed resource assessment using the predicted NHB construction workforce to identify net additional policing demands.
2. Additional resourcing is needed across Local Policing, Custody, Contact & Control Room (CCR) and Roads Policing (including AIL escorting) functions, including specialist officers with lead-in times for recruitment and training. The quantum and structure of resourcing must be adequate, effective and appropriate for the policing context of the proposed scheme in Suffolk.
3. Robust monitoring of the construction workforce, community safety impacts and mitigation effectiveness needs to be secured and implemented to ensure the avoidance of residual significant adverse effects, including from potential workforce changes (size or composition).
4. Adequate and effective governance and contingency funding arrangements are needed to address additional community safety risks not mitigated through upfront funding.

Discussions with the Applicant are ongoing but, at present, there remains significant differences between parties in respect of resourcing and associated funding whilst monitoring has yet to be confirmed and governance matters remain unresolved. The Constabulary has re-affirmed to the Applicant its willingness to commit to more intensive engagement to seek to agree these matters [REP6-047]. The Constabulary therefore wishes to see further progress and for those discussions to be increasingly productive.

Issue Specific Hearings

In line with the information provided on the 'Notification of Issue Specific Hearings', dated 17 August 2021, I would like to notify the Examining Authority of the Constabulary's intention to attend and be heard orally at the following:

- Issue Specific Hearing 12 on Wednesday 15 September 2021
- Issue Specific Hearing 14 on Friday 17 September 2021

The Constabulary wishes to attend the above hearings virtually and therefore requires access arrangements for:

- VC-LMH-3rdFloor@norfolk.pnn.police.uk

If you have any questions or clarifications, please do not hesitate to contact me or Emma-Mai Eshelby [REDACTED]

Yours sincerely,



Natalie Maletras
Director
on behalf of Stantec UK Ltd

Enclosures:

- i. Appendix A: Summary of Suffolk Constabulary's Policing Mitigation Requirements
- ii. Appendix B: Response to the Examining Authority's Written Questions (ExQ2)

Appendix A



SUFFOLK CONSTABULARY

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Calls may be monitored for quality control, security and training purposes.

Our ref: SC/SZCDCO

27 August 2021

Dear Carly,

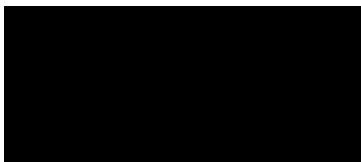
Further to your helpful meeting with David 9th August and his email communication of 13th August, I am writing to confirm the policing mitigation measures required in respect of the construction phase of the proposed Sizewell C Nuclear Power Station (SZC). As you are aware, these measures need to be secured through the SZC Development Consent Order (DCO) and Deed of Obligation (DoO) prior to the conclusion of the SZC DCO Examination. I note there is an Issue Specific Hearing (ISH) on Friday 17th September in relation to DCO and DoO matters and I would hope we could be in a position at this ISH to inform the Examining Authority that we have made substantial progress, if not having agreed the mitigation measures between ourselves.

Mindful of the need to reach agreement in a short space of time, to make progress I thought it would be helpful to summarise the Constabulary's current position as set out below and detailed in **Appendix A**. Importantly, the Constabulary's mitigation requirements extend beyond simply the agreement of adequate funding to cover four interlinked principles:

1. Mitigation must be compatible with Suffolk Constabulary's operational model and appropriate to the context of the SZC project in Suffolk. This includes basing Local Policing resources in Leiston. Notwithstanding disagreements regarding modelling, the Constabulary has undertaken a detailed resource assessment using the predicted NHB construction workforce to identify net additional policing demands. Local Policing resourcing requirements are summarised in **Appendix B**.
2. Additional resourcing is needed across Local Policing, Custody, Contact & Control Room (CCR) and Roads Policing (including AIL escorting) functions, including specialist officers with lead-in times for recruitment and training. The quantum and structure of resourcing must be adequate, effective and appropriate for the policing context of SZC in Suffolk.
3. Robust monitoring of the SZC construction workforce, community safety impacts and mitigation effectiveness needs to be secured and implemented to ensure the avoidance of residual significant adverse effects, including from potential workforce changes (size or composition).
4. Adequate and effective governance and contingency funding arrangements are needed to address additional community safety risks not mitigated through upfront funding.

At present there remains a significant difference between parties in respect of resourcing and associated funding (items 1 and 2), whilst monitoring (item 3) has yet to be confirmed and important governance matters (item 4) remain unresolved. The Constabulary has been willing for some time now to commit to more intensive engagement to seek to agree matters. I therefore hope that a further and more detailed meeting can be arranged with David at your earliest convenience to discuss all of the required policing mitigation measures.

Yours sincerely,



Leigh Jenkins, Business Liaison Manager, Suffolk Constabulary

Appendix A – Summary of SZC Policing Mitigation Requirements

SZC Policing Mitigation Requirements - Summary	
<i>Local Policing Resourcing</i>	
Quantum	Additional resourcing needs to be deployed and funded by the SZC project when the SZC NHB construction workforce is predicted to generate additional policing demand. As detailed in Appendix B , 94 FTE additional officers (person years) are required to meet the likely demand associated with the NHB workforce over the estimated 12-year build period, of which 12 FTE (person years) at Sergeant are needed to ensure efficient management and tasking. As agreed, an additional 3 FTE resources (1 Sergeant & 2 Police Constables) are also now required for ‘Year 0’ to address demand including initial workforce and community engagement. Based on current 2021/2022 NPCC rates ¹ the total resourcing cost for Local Policing therefore amounts to £10,034,121.50 . This needs to be indexed linked to retain resourcing parity throughout the build period.
Flexibility	Financial contributions must be able to 'flex' to allow for greater than initially anticipated contributions in the event of workforce changes and would need to be extended if the construction period exceeds the modelled time period (and taking account of a new ‘Year 0’ as noted above). Suffolk Constabulary must remain in control of all operational deployment decisions.
Shift Patterns	The quantum of additional officers needs to be distributed across the Leiston Safer Neighbourhood Team (SNT) and Halesworth Neighbourhood Response Team (NRT): adequate additional NRT officers need to be distributed across 5 two-person teams working 3 shifts (early / late / night) and SNT officers distributed across two shifts (early / late), rather than the total quantum of resources being available for single shift deployment. As the primary response to category 1 and 2 (blue light) emergency calls, in the event of inadequate funding Suffolk Constabulary would be forced to prioritise emergency response duties by allocating officers to the Halesworth NRT ahead of the Leiston SNT, which would limit the potential for onsite and community engagement.
Contingency Arrangements	The principle of a contingency fund is agreed but the level of funding still needs to be agreed and changes to governance are required to enable funding to be accessed for policing purposes when required. To ensure adequate funding can be readily accessed to address additional community safety risks attributable to the SZC project or workforce (e.g. potential county lines activity), a rolling-fund with an annual cap set at 10% of base Local Policing mitigation funding should be established and governed by the Community Safety Working Group (CSWG).

¹ The nationally recognised National Police Chiefs Council (NPCC) full cost recovery rates include provision for officer salary inclusive of national insurance and pension contributions, plus direct overheads such as equipment, insurance, training, call handling and officer support staff including custody management. As these are essential components of policing it would not be appropriate to calculate resource funding based solely on Local Policing officer salaries. 2021/22 NPCC PC rate = £99,515; NPCC Sergeant rate = £125,008.

SZC Policing Mitigation Requirements - Summary

Facilities	A strategic base needs to be established within Leiston to allow funded officers to operate within the community, with a suitable facility also provided by the Applicant on-site to enable engagement with the SZC project leadership and workforce. A suitable location for a modular temporary police facility has been identified within the curtilage of Leiston Sports and Social Club, with capital and revenue (utilities & equipment) costs currently estimated at approximately £190,000 and £10,000 per annum respectively. This is wholly separate from resource funding (FTE officers) and is not covered by the NPCC full cost recovery rate.
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Roads Policing

AIL Unit	An agreed matrix (pre-mitigation Matrix) will guide initial requirements for AIL police escorting, with the size of the AIL unit and associated funding set to reflect the expected quantum of AIL movements that the Applicant requires during the construction period, on which the Applicant is to advise:
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Total Unit Requirement with Abstraction Rate							
No. of Teams	2	3	4	5	6	7	8
Baseline Requirement	6	9	12	15	18	21	24
No. of Full Escorts per day	4	6	8	10	12	14	16
No. of Partial Escorts per day	8	12	16	20	24	28	32
Operational Requirement (A/L / Sickness)	0.33	0.33	0.33	0.33	0.33	0.33	0.33
Total Team Requirement	7.98	11.97	15.96	19.95	23.94	27.93	31.92
Total FTE Team Requirement	8	12	16	20	24	28	32
Indicative Cost (per annum)	£821,613.00	£1,219,673.00	£1,643,226.00	£2,041,286.00	£2,439,346.00	£2,862,899.00	£3,260,959.00

An additional (post mitigation Matrix) is being developed by the Applicant to identify reduced police escorting requirements once adequate physical mitigation is in place. A dedicated AIL unit needs to be established by the Constabulary to accommodate the anticipated volume of AIL movements requiring police escort over the build period. Both AIL matrices need to be incorporated within the SZC Construction Traffic Management Plan (CTMP) and effective review and governance mechanisms need to be secured.

Any amendments to either matrix or proposed reduction of officers and associated funding under a post-mitigation scenario must be agreed with Suffolk Constabulary and other relevant parties including Suffolk County Council in advance through the Transport Review Group (see below). Any reduction would limit the capacity of the AIL Unit to undertake wider roads policing duties along the network used by SZC construction traffic when not deployed on AIL escort tasks.

SZC Policing Mitigation Requirements - Summary

Monitoring & Governance

Monitoring	Robust monitoring of SZC workforce, community safety impacts and mitigation effectiveness needs to be secured and implemented to ensure the avoidance of residual significant adverse effects, including from workforce changes (size or composition). A suite of robust monitoring measures must therefore be appended to the Deed of Obligation and applied by the CSWG, which should be responsible for monitoring both impacts and the effectiveness and adequacy of deployed mitigation.
Governance	<p>Suffolk Constabulary requires <i>all</i> governance matters raised within the Constabulary’s submission at Deadline 6 (and previous submissions) to be reasonably addressed, including but not limited to:</p> <ul style="list-style-type: none"> • SZC Emergency Coordinator to be appointed prior to undertaking any pre-Commencement works. • DCO Requirement 5A Construction Emergency Plan extended to address Suffolk Constabulary’s role in providing co-ordination and incident response capabilities. • CSWG must be empowered with the authority to review monitoring and determine any necessary changes to community safety mitigation to ensure such mitigation remains proportionate, adequate, effective, appropriate and relevant. • In addition to funded police resourcing, dedicated Community Liaison Officer(s) reporting to the CSWG must be appointed to ensure mitigation through public and emergency services is deployed effectively and that clear lines of communication with the Applicant are maintained at all times. • As Suffolk Constabulary plays a fundamental role to play in road safety and the movement of AILs, the Constabulary must be able to influence the development, implementation and monitoring of the SZC CTMP and Traffic Incident Management Plan (TIMP) through being a full member of the Transport Review Group (TRG) with voting rights.

Appendix B – Local Policing Resourcing Requirements

As noted in Appendix A, the equivalent of 94 FTE additional officers will be required over the original 12-year build period to meet the demand associated with the NHB workforce, plus 3 FTE resources for the recently proposed 'Year 0' (including for initial community engagement). Table B.1 below presents the predicted total Local Policing resourcing requirement² and associated cost³, disaggregated into 6-month periods.

Table B.1: SZC Local Policing Additional Resource Requirements – 6 Monthly Deployments

Year	Months	FTEs Required	Sergeants	PCs	Cost (2021/22 NPCC PC Rate)
Year 0	1 - 6	3.0 FTE	1	2	£162,019.00
	7 - 12	3.0 FTE	1	2	£162,019.00
Year 1	1 - 6	1.0 FTE	1	0	£62,504.00
	7 - 12	2.0 FTE	1	1	£112,261.50
Year 2	1 - 6	3.0 FTE	1	2	£162,019.00
	7 - 12	4.0 FTE	1	3	£211,776.50
Year 3	1 - 6	6.0 FTE	1	5	£311,291.50
	7 - 12	7.0 FTE	1	6	£361,049.00
Year 4	1 - 6	9.0 FTE	1	8	£460,564.00
	7 - 12	10.0 FTE	1	9	£510,321.50
Year 5	1 - 6	12.0 FTE	1	11	£609,836.50
	7 - 12	14.0 FTE	1	13	£709,351.50
Year 6	1 - 6	14.0 FTE	1	13	£709,351.50
	7 - 12	16.0 FTE	1	15	£808,866.50
Year 7	1 - 6	17.0 FTE	1	16	£858,624.00
	7 - 12	17.0 FTE	1	16	£858,624.00
Year 8	1 - 6	15.0 FTE	1	14	£759,109.00
	7 - 12	13.0 FTE	1	12	£659,594.00
Year 9	1 - 6	10.0 FTE	1	9	£510,321.50
	7 - 12	6.0 FTE	1	5	£311,291.50
Year 10	1 - 6	4.0 FTE	1	3	£211,776.50
	7 - 12	2.0 FTE	1	1	£112,261.50
Year 11	1 - 6	2.0 FTE	1	1	£112,261.50
	7 - 12	2.0 FTE	1	1	£112,261.50
Year 12	1 - 6	2.0 FTE	1	1	£112,261.50
	7 - 12	1.0 FTE	1	0	£62,504.00
Total Resourcing Funding Requirement					
Years 1 - 12		94.0 FTE	12	82	£9,710,083.50
+ Year 0		97.0 FTE	13	84	£10,034,121.50

² Associated with the NHB construction workforce based on DCO application and baseline demographic conditions. This includes a tolerance of 0.19 FTE demand in any period prior to seeking additional resources and calculation of NHB workforce families as 13% of NHB workforce level (i.e. excluding dependents).

³ Calculated using nationally recognised National Police Chiefs Council (NPCC) full cost recovery rate – refer to footnote 1 for details. Whilst Suffolk Constabulary works to a 30% abstraction rate, this has not been factored into base resourcing calculations.

The greater flexibility of the six-monthly deployment schedule allows Suffolk Constabulary to respond to changes in demand more readily, leading to fewer periods where the level of resourcing is above or below the anticipated monthly demand. This also enabled removal of the ‘workforce based uplift’ previously proposed by the Constabulary to address periods where monthly resourcing significantly exceeds the average annual level.

The proposed six-monthly deployment approach is illustrated graphically for the original 12-year build period by Figure 1 below, which plots required additional policing resourcing against predicted demand (in terms of FTE officers) based on monthly NHB workforce estimates. As agreed, additional resourcing (3 FTE) is also required for the recently proposed ‘Year 0’ of construction activities, including for initial community engagement to help allay local concerns regarding community safety risks at the start of the SZC project.

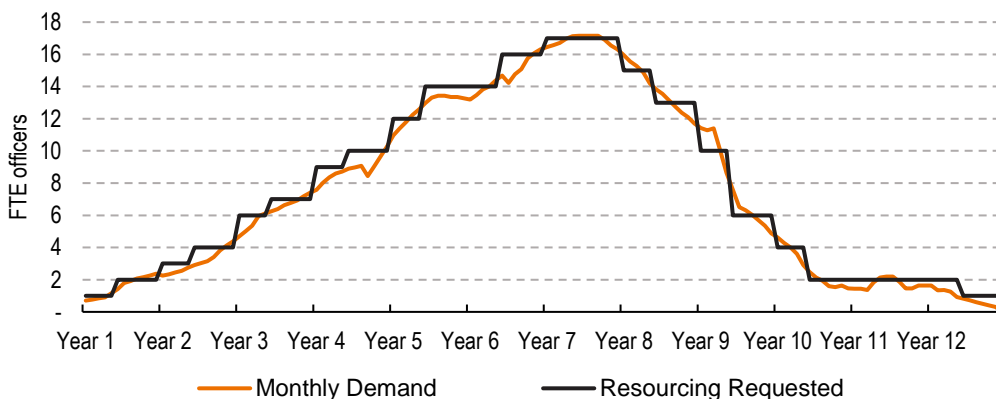


Figure 1: Required additional resourcing and monthly demand (12 year build programme excluding Year 0)

Appendix B



Sizewell C
Response to the ExA's Second Written Questions
(ExQ2)
Suffolk Constabulary

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1 Response to the ExA's Second Written Questions

1.1 Overview

- 1.1.1 This document, submitted for Deadline 7 of the Examination, contains Suffolk Constabulary's ('the Constabulary') response to the Examining Authority's (ExA) Second Written Questions (ExQ2).

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

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
Questions to the Constabulary			
TT.2.6	Suffolk County Council; Suffolk Constabulary	<p>Abnormal Indivisible Loads (AIL) Management [REP5-114]</p> <p>Provide comment on whether the position with respect to AIL set out by the applicant is acceptable on the following routes:</p> <ol style="list-style-type: none"> i. A14; ii. A12, Lowestoft to Leiston; iii. A12, Woodbridge to Leiston; and iv. B1122. 	<p>Summary Position</p> <p>The Parties are making progress towards an agreed position with regards to the management of AILs associated with the Project but have yet to reach a final agreement. The Parties then need to agree the amount of funding that the Applicant will provide to support the necessary additional resources.</p> <p>Matrices giving guidance as to the management of AILs are being confirmed. If they are agreed and funding for the AIL Unit is confirmed then the Constabulary will be able to accept the Applicant's position with regards to the pre-mitigation management of AIL movements along the roads used to access and leave the Project i.e. the A14; A12 (Lowestoft to Yoxford); A12 (Woodbridge to Yoxford); and B1122.</p> <p>It has been impressed upon the Applicant that the Constabulary requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p>The Approach to Agreeing the AIL Strategy</p> <p>The following approach is being pursued to establish an agreed strategy for the management of AILs associated with the Project:</p> <ol style="list-style-type: none"> 1. The Applicant provides a suitable prediction of the number, type/sizes and schedule of AILs required by the Project; 2. The Parties agree that data; 3. The Parties agree guidance on which AILs need escorting and across which sections of the network;

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>4. A matrix/matrices are prepared to confirm the escorting needs;</p> <p>5. The Constabulary assesses/models the resources it needs to manage its involvement in the agreed strategy (i.e. based on the number of AILs to be escorted per day and over what distance);</p> <p>6. The Applicant confirms its funding of the predicted resources;</p> <p>7. The Constabulary receives funding and establishes the AIL Unit (allowing for recruitment and training lead in times);</p> <p>8. The Parties operate the agreed schedule (number type/size and schedule);</p> <p>9. Extra AIL movements are moved in accordance with standard AIL practices; and</p> <p>10. The Parties monitor and review the AIL strategy on an agreed basis and reflect on that review.</p> <p>At the time of preparing this response (i.e. Deadline 7 of the Examination), the Parties have:</p> <ul style="list-style-type: none"> • agreed the basis of the AIL predictions (points 1 and 2 above); • agreed which AILs need escorting (point 3 above); • agreed in principle the first matrix (point 4 above); • made progress towards completing the resource modelling (point 5 above); and • some acknowledgement of funding has been given (point 6 above). <p>Progress on the AIL Management Strategy</p> <p>The Constabulary and the Applicant have been working towards an agreed matrix ('the pre-mitigation Matrix') which will guide the requirements for the policing of AIL movements to and from the working areas associated with the Project (i.e. including the main worksite; the off-site associated developments; and the off-site road projects of the Sizewell Link Road, the Two Villages Bypass and the Yoxford Road roundabout). It has been agreed between the two parties that the pre-mitigation Matrix will be included within the control document of the Construction Traffic Management Plan ('CTMP').</p> <p>The Applicant also proposes to prepare the additional 'post-mitigation Matrix' which will reflect on the effects of the Sizewell Link Road, Two</p>

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>Villages Bypass and Yoxford Road roundabout on AIL access and egress. It is understood that the Applicant will put forward that the post-mitigation Matrix will reduce the anticipated draw on the Constabulary's resource by reducing the need for police escorting. The post-mitigation Matrix has yet to be provided by the Applicant for review. A post-mitigation Matrix could be included in the CTMP, subject to agreement between the parties.</p> <p>Subject to the pre-mitigation Matrix being formally presented in the CTMP, in line with the detail that is being agreed between the parties, the Constabulary will then be satisfied that the Applicant has the correct guidance in place to provide to its contractors and hauliers to inform the movement of AILs to and from the Project. The duty is then on those contractors and hauliers moving the AILs to comply with that guidance or to demonstrate, to the satisfaction of the Constabulary and Highway Authority, why it is appropriate to deviate from it.</p> <p>The agreed pre-mitigation Matrix and post-mitigation Matrix will be used by the Parties to predict the requirements for escorting AIL movements associated with the Project.</p> <p>The assessment of the number, type and schedule of AIL movements associated with the Project is being based on recorded data from the Hinkley Point C ('HPC') project, as an indicative proxy in the absence of detailed predicted data specific to the Project. In turn that informed prediction for the Project will assist the Constabulary in modelling the resources which will be required to manage the Constabulary's involvement. It is then expected that the Applicant will fund that resource for the term of the construction period, subject to agreed reviews to reflect changes in predictions and programme. The frequency of reviews has not yet been set.</p> <p>What must not be neglected by the Applicant, when establishing the AIL strategy, is the demand for AIL movements to and from the associated development sites during their construction and removal – which includes the construction of the Sizewell Link Road and Two Villages Bypass. These will also have a draw on police resources and if that demand is not included within the resource allocation to be funded by the Applicant, then</p>

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>the management of those movements will be carried out using the limited existing resources within the Constabulary.</p> <p>The pre-mitigation Matrix is predicated on assumptions, which have been agreed with the Applicant. Those assumptions will inform the size of the dedicated AIL Unit for the project and have been used to model the resource requirements needed within the Constabulary for the AIL Unit. If the assumptions are changed, or deviate from that agreed, this needs to be communicated by the Applicant as this may impact of the size of the AIL Team required.</p> <p>Assumptions that will be used by the parties to predict the resource requirements and are informing the model are:</p> <ol style="list-style-type: none"> 1) AILs are only permitted to be moved Monday – Saturday during defined periods outside network peak hours. 2) Each AIL escort requires 3 officers and associated vehicles. 3) Each team of 3 officers can escort either 2 full length AIL journeys (i.e. from Felixstowe Port, Lowestoft Port or Orwell Crossing, referred to a "full escort") OR 4 partial length AIL journeys (i.e. pick up along the A12 referred to as a "partial escort") in 1 shift. 4) AILs to be escorted on part of their journeys could be picked up along the A12 south of Yoxford, from a modified layby, subject to modifications agreed with Suffolk County Council as local highway authority and up to the width of 4.4m. AILs over 4.4m width are assumed by the Constabulary to require a full escort from the county boundary. The layby at Darsham, on A12, is not controlled by the Applicant and therefore cannot be included in the modelling. 5) With the exception of VR1 and Special Order AILs, it is assumed that all other AILs will approach SZC from the south along the A14 and north along the A12. 6) Accidents and delays to the road network have not been factored into the model. 7) The AIL model is predicated on Hinkley Point C transport data (2017 - 2020 inclusive) as the most accurate estimate of the likely nature of AILs (size and number) for SZC.

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>8) Potential delays and predictions around size of team are based on the scheduling shown in the HPC AIL data.</p> <p>9) The AIL model uses baseline officer numbers and does not include abstraction rates.</p> <p>10) The AIL model does not take into account Bank Holidays</p> <p>11) Where AIL weight data is missing from the HPC data, it is assumed that the AIL will require a full escort.</p> <p>12) If width data is missing from the HPC data those loads are assumed to be included in the 3.5 - 4.399m wide category, and will require at a minimum a partial escort.</p> <p>13) All 3.5 wide AILs are included in the 3.5m - 4.399m wide category as hauliers often forget to include mirrors in width measurements</p> <p>14) All AILs in 2017 HPC AIL data that have no dimensions or category assigned are assumed to require a full police escort.</p> <p>15) The Constabulary agrees and uses the total number of HPC AILs shown in the draft CTMP table 3.1 in its analysis but not the categorisations (for the reasons set out above). It agrees that the pro rate distribution of 2017 and 2018 AILs with missing data is an appropriate approach for the CTMP but the model created by the Constabulary uses weight data not categories.</p> <p>16) Where length data is missing those loads are assumed to be below 27.3m in length.</p> <p>17) Costings provided are indicative costs based upon the current National Police Chiefs' Council ('NPCC') full cost recovery rate (excluding fuel). The NPCC annual cost of a Police Constable in 2020/21 is £101,318. The NPCC annual cost of a sergeant in 2020/21 is £122,933. These costs will increase each year in accordance with inflation and cost of living rises.</p> <p>18) The model is based upon the Constabulary's risk guidance as set out in pre-mitigation Matrix. For the purposes of calculating resource requirements only red rated risks (those assessed as high risk and requiring police escort) have been modelled. Loads that are assessed as amber are not included within the resource capacity prediction.</p> <p>19) The on-going availability of an AIL meeting and inspection facility at the Orwell Lorry Park, or a similar suitable facility.</p> <p>20) No AIL access at the Freight Management Facility or Park and Ride sites.</p>

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

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>Two elements which are informing the AIL strategy, and the resources required, are the use of the Orwell Lorry Park as a location for the assigned Police escorting team to meet AILs; and the prospect of locations mid-route along A12 north and south of Yoxford to supplement the strategy. This has the potential to reduce the necessary escorting distance by allowing AILs to travel part way along A12 before joining the police team for the load and vehicle to be inspected and escorted.</p> <p>Firstly, it is noted that the Orwell Lorry Park has been identified for redevelopment which will require the Applicant to identify an alternative location to meet the Police escorts and have the commencement inspections carried out safely – where a mid-route A12 meeting place is not available or appropriate.</p> <p>Furthermore, if an acceptable configuration and location cannot be achieved for the mid-route meeting point on A12 south then the resource requirement will be based on the need to meet all escorted AILs at the Orwell Lorry Park, if it is available of a similarly agreed point close to the Suffolk County boundary. It is currently unlikely that a mid-route meeting location on A12 for AIL north of Yoxford will be achieved by the Applicant.</p> <p>Any changes to the strategy will need to be reflected in the pre and post mitigation Matrices</p> <p>Subject to receipt of sufficient and timely funding from the Applicant (to be secured by the Deed of Obligations), the Constabulary will be able to support the AIL movement strategy to the level of the resources provided by the Applicant's funding.</p> <p>As per Paragraph 1.4.5 of REP5-114, the Constabulary notes that the Applicant is agreeing in principle to fund resources for a bespoke AIL unit. This will set the level of assistance that can be dedicated to the Project and will be the Applicant's risk to set the resourcing correctly.</p> <p>The Constabulary has expressed to the Applicant that even with the funding of a dedicated AIL Unit, the current practices regarding the</p>

ExQ2	Question to:	Question:	Suffolk Constabulary's Response:
			<p>notifications of AIL movements is paramount. It is through the appropriate scheduling and notification of the AILs, and good liaison between the Applicant and the Constabulary, that the smoothest movement of AILs can be achieved.</p> <p>As stated in the summary, it has also been impressed upon the Applicant that the Constabulary requires the appropriate lead in time to establish the dedicated AIL Unit in a timely manner, so that it is available for when the Project needs to commence with AIL movements. Additionally, as the size of the AIL Unit is predicated on data provided by the Applicant, it is important that the Applicant recognises that any need to increase the size of the AIL Unit during the construction of the Project, due to the Applicant/Undertaker underestimating AIL demand, will be subject to the delays resulting from recognised recruitment and training requirements.</p> <p>Furthermore, any excess AIL movement demands beyond those identified by the Applicant's predictions and funding will be subject to the same procedures and programming as other hauliers experience when wishing to engage Constabulary resources to move an AIL. This operation is at the Undertaker's own risk.</p> <p>The Constabulary has indicated to the Applicant that the AIL Unit will be able to apply any spare resource time to other roads policing tasks, once AIL management is accounted for. Those additional policing tasks will be rostered to reflect the demands on officers' time. There can be no commitment to what that time and input will be and the Applicant cannot rely on that input to mitigate effects of the Project.</p> <p><i>Supplementary Observations on REP5-114</i></p> <p><u>B1122 journey times:</u> The Constabulary considers that the estimates of travel timings along B1122 between Yoxford and the main site at Paragraphs 1.4.6-1.4.9 of REP5-114 are appropriate under current conditions and with no other external effects e.g. third party incidents. These times could extend if AILs (and associated escorts) come into conflict with similarly large vehicles in the opposing direction, which can quickly add travel time and disruption</p>

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			<p>whilst the escorts manage the opposing flows at the most convenient passing point. The Constabulary's experience, when escorting larger AILs (e.g. over 3.5m wide), is that the average speed is much lower than 30mph.</p> <p>It is noted that the travel predictions relate only to B1122 and do not reflect on the movement of AILs on the A12 corridor.</p> <p><u>Classification of AILs:</u> Paragraphs 1.5.1, 1.6.38 and Appendix A Figure 1 of REP5-114 sets out the vehicle type that are to be monitored during the construction of the Project. The classifications do not include HGVs over 44t and therefore excludes a number of AILs. The Applicant has to date recorded all vehicles arriving and departing the HPC works site. The Constabulary would expect all AILs movements to be recorded in the observations of HGVs access the main works. Within reason, the Constabulary does not comment on the appropriateness of the caps on HGV movements and whether this should include or exclude AIL movements referred to at Paragraph 1.6.45 of REP5-114. This would be a matter for Suffolk County Council and East Suffolk Council as Local Highway Authority and Local Planning Authority, respectively, until the movements of HGVs and other vehicles associated with the Project became such that the volumes of traffic hindered the safe and efficient operation of the road network and the management of AILs. The Constabulary is, however, keen to have the data on the number and format of AIL movements recorded and monitored to allow for the on-going management of the AIL systems and resourcing and would therefore propose that vehicles in excess of 44t are also recorded, reported and monitored. This will be important to assist with monitoring and auditing.</p> <p>In view of the pivotal role the Constabulary holds when maintaining the safety of road users in Suffolk, and the need to monitor and react accordingly to potential impacts of the Project, the appropriate mechanism for reporting and monitoring the management of AIL numbers and reviewing the effects of the operations is through the Transport Review Group ('TRG'). The Constabulary notes that the Applicant has proposed that the Constabulary is invited to attend the TRG, however, the Constabulary must be a full member of the TRG with voting rights in order properly to represent its interests during the construction period as a key</p>

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			<p>stakeholder in the management of Roads Policing. This view is one that has been repeated by the Constabulary to the Applicant and is supported by those key strategic partners that wish to see the smooth operating of Suffolk's roads during the Project.</p> <p><u>Constitution of the Transport Review Group:</u> Paragraphs 1.6.12 and 1.6.13 of REP5-114 refer to the constitution of the TRG and its associated power and mandate on the management and control of the construction period traffic. The proposed constitution of the TRG would be for a 50/50 split between the Undertaker and local authority stakeholders. Those local authority stakeholders include Highways England (to be rebranded National Highways at the time of writing). Highways England's role in relation to the construction of the Project is related to the effects on the Trunk Road network. Its jurisdiction in Suffolk therefore ends at the junction of A14 with A12 (the Seven Hills interchange). It can be reasonably anticipated that Highways England would be minded not to use their vote on matters that do not directly affect the Trunk Road network, thus giving the casting vote on contentious matters to the Undertaker. It would therefore seem appropriate to restore that balance by providing the Constabulary full voting rights on the TRG, not least as they are a key stakeholder in the management of the road network across Suffolk but also that decisions made at the TRG will have a direct effect on the Constabulary's operations.</p> <p><u>Off-site Mitigation Clarification:</u> The Constabulary has requested clarification relating to the design and layout of the Sizewell Link Road and the Two Villages Bypass, regarding the configuration of the associated roundabout junctions and the need, or otherwise, for central double white lining along the corridors. These design clarifications will affect the scale of resourcing that will be required to support the construction period which the Applicant will require. The Applicant proposes that a revised AIL matrix will be sought to reflect its off-site mitigation (i.e. the Sizewell Link Road, Two Villages Bypass and the adjusted Yoxford Road roundabout). That matrix will be considered by the Constabulary once received and reflecting the design clarifications which have been sought.</p>

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			<p>At Paragraph 1.7.1 of REP5-114, the Applicant asserts that the Yoxford roundabout is sized to “accommodate the largest expected AIL movement for both Sizewell B and C”. The Constabulary previously has sought from the Applicant clarification on when it anticipates it will need to utilise the dedicated through route which crosses the centre of the roundabout. The Applicant has provided swept-path information on scenarios of AIL configuration which can negotiate the junction between A12 north and Yoxford Road, but it has not confirmed when the central route will be required and how that use will be managed. Subject to the temporary traffic management mechanisms that the Applicant proposes to put in place on those occasions, the use of the central route could require the Constabulary in attendance to direct general traffic.</p> <p>Further to the consideration of the movement of AILs associated with Sizewell B and C, the Constabulary requires clarification on the configuration of vehicles that can move through the junction between A12 north and A12 south (and vice versa) without Constabulary assistance. The A12 corridor will continue to be used for AIL movements for vehicles not associated with the Project or Sizewell B. The Applicant needs to show that the introduction of a roundabout in this important corridor will not affect the ability of other AILs to move along the A12 without the assistance of the Constabulary, where previously assistance was not required.</p>