

Five Estuaries Offshore Windfarm

Essex Police Initial Response

June 2024

Application by Five Estuaries Offshore Wind Farm Ltd

Notification of decision to accept an application for Examination for an Order Granting Development Consent

Relevant Representations of Essex Police

Introduction

This document sets out the initial Essex Police response to the Planning Inspectorate's decision to accept an application for Examination for an Order Granting Development Consent (DCO) for the Five Estuaries Offshore Wind Farm.

We understand that the project is an offshore wind farm to generate in excess of 300MW and will be comprised of (but not limited to): an offshore wind farm, including wind turbine generators and associated foundations and array cables; transmission infrastructure, including offshore substations and associated foundations, offshore and onshore export cables (underground), including associated transition bays and jointing bays, an onshore substation, and connection infrastructure into the National Grid.

Whilst the scheme development and opportunities are acknowledged, our review of the project indicates that operational impacts are likely to arise for Essex Police.

The representations of Essex Police seek to secure appropriate mitigation and management measures to address the likely impacts arising from the project on its operations, service capacity and resources throughout the project stages (concept, construction, and completion). Essex Police will undertake analysis of data provided by the applicant during the examination and may request contribution to infrastructure or resourcing requirements where significant impact to policing provision is identified. Comments are also made in relation to the project which warrant consideration in the form of scheme clarification and/ or amendment, which are summarised under the relevant points below.

Considerations

Our comments in relation to the scheme development and construction phases are outlined below.

Additionally, comments relating to the applicants Outline Construction Traffic Management Plan¹ are noted for consideration.

1. Scheme Development

Communications

1.1 It is anticipated that community disruption resulting from the project will lead to an increase in calls for service to Essex Police. A clear contact strategy and community liaison route for matters relating to the project will be required to ensure that the citizen can obtain the correct service and advice to reduce the impact to the contact management command within Essex Police.

Designing Out Crime Considerations

Throughout the life cycle of the scheme, site specific assessments such as risk and security will be relevant across all components of the design. There is an internationally accepted method of formulating

¹ Volume 9 Report 9.24: Outline Construction Traffic Management Plan

a designing out crime risk and security strategy, based upon the types of incidents that may occur. The common denominators of which comprise of three elements: physical design, social issues and maintenance and care. Specific crime types can potentially be 'designed out' and minimised, which consequently will prevent the need for future bespoke situational crime prevention measures. Embedding the concept of 'safety and security' throughout all proposals will ensure the longevity of the scheme, achieve sustainability aims and mitigate the opportunity for crime.

1.2. The location, design and security of site compounds must utilise applicable security standards across all components wherever appropriate and ensure effective measures are in place to mitigate the risk of criminal activity such as theft of equipment and/or materials and Anti-Social Behaviour (ASB).

1.3. Essex Police acknowledge the proposal appears to utilise several main construction compounds for the project and we would request liaison and discussions in relation to these sites and any smaller dedicated compound(s). Such engagement will reflect matters including, but not limited to:

- Specification of boundary treatments and fence provision.
- Maximising on natural surveillance opportunities.
- General management and maintenance.

1.4. It is recognised that aspects of the 'construction and building site' will not be contained within a dedicated compound but span the length of the route, increasing the potential risk of crime, particularly in the more rural and green field locations. Appropriate mitigation should be in place to minimise the risks identified.

2. Construction

Construction Workforce

Whilst the introduction of construction workers will help boost the local economy, there are also disbenefits which may impact on existing communities as a result, which could include increased night-time economy and an increase in volumes of crime as a victim or involved party.

2.1. Population increase, health, and wellbeing information is requested to determine the size and nature of the construction workforce, their home origin, health status, and location of any temporary accommodation.

2.2. Within the planning documentation², reference is made to the induction and training of site personnel in order to provide on-going reinforcement and awareness training. Essex Police would request that included within this process is training in relation to staff vigilance for identifying security concerns and risks, and ongoing reinforcement that security practices are embedded. This will enhance staff health and wellbeing and encourage ownership of employees of the site.

2.3. Essex Police request all personnel are advised of the illegality of using e-scooters if they are not part of a recognised scheme. E-scooters form part of our vulnerable road users and in rural roads present a risk to the rider's safety and the safety of others.

Response Plans

The Human Rights Act 1998 makes provision for expression which includes protest. There is an obligation on public organisations to protect these rights, but protection of these rights must be balanced against the impact protest activities may have on the wider community.

² Volume 9, Report 21, Code of Construction Practice: Sections 3.4 Site Induction, and 3.5 Training and Toolbox Talks

During the past 18 months Essex has been subject to significant disruptive protest from a range of environmental groups, anti-government protests, and cost of living protests. This has seen the deployment of large numbers of police resources to manage protest activity. A varied and impactful range of tactics have been used by protestors.

2.4. Essex Police request engagement and liaison throughout the project to ensure an appropriate protest response and incident management plan is in place; this should include attendance response and management, key points of contact, and the management of health and safety.

2.5. Major accidents and disasters, including construction worker specific accidents and injuries must be considered including the development of plans and contingencies for facilitating emergency access for all Blue Light services, which in urgent cases may also require safe National Police Air Service (NPAS) helicopter access.

Traffic Management Considerations

The construction phase is likely to present challenges to Essex Police for responding to calls for service impacting our operational effectiveness, with considerable impact to communities located within and around the scheme boundaries. Essex Police request inclusion in any scheme related traffic management forums and engagement regarding:

2.6. Advance insight into road closures and diversions with ease of access to site/s and surrounding housing and industrial estates for blue light services to achieve their respective response times.

2.7. Advance insight into the movement of Abnormal Indivisible Loads (AILs) for early mitigation. Essex Police seek to agree a point of contact with the project and a clear process for the movement of such vehicles to allow for appropriate police approval and management. Additionally, there is a requirement to identify holding areas for AILs to ensure minimal disruption and the safety of all road users.

The safety of all road users during the construction phase is significantly important. Nationally, rural roads have the highest level of loss of life through road traffic collisions and the current network of roads may not be suitable to cope with the increased level of traffic during the construction phase without appropriate management in place and improvements where required. Local communities may be directly impacted as they are located within the construction routes, or subject to higher volumes of traffic being located on diversion routes. Additionally, the surrounding road network will see an increase in the movement of Heavy Goods Vehicles (HGVs).

2.8. Consideration must be given to the management and enforcement of vital road traffic restrictions during the construction phase, including areas such as reduced speed limits or weight limit and prohibition of work(s) traffic, ensuring minimal impact to policing resources.

3. Construction Traffic management Plan

The following comments relating to the applicants Outline Construction Traffic Management Plan³ (OCTMP) are noted for consideration.

Please note, the OCTMP text is shown in *italics* for reference alongside the relevant document section in brackets. The Essex Police response or question is shown in **bold** following the quote.

Abnormal Indivisible Loads (2.3)

³ Volume 9 Report 9.24: Outline Construction Traffic Management Plan

Should delivery of AILs or other construction traffic activities, be required outside of the core working hours (see Volume 9, Document 21: CoCP, Section 3.2) prior notice will be given to the local planning authority in a reasonable time (to be agreed with Essex County Council) before such traffic movements commence. (2.3.2)

3.1. Essex Police request the Force AIL Liaison Officer (ALO) is included in such communications to ensure early awareness of proposals to allow for planning of resources.

The Project will keep residents fully informed of details in relation to the timing of the delivery of AILs. Ahead of any delivery, the CLO will communicate, where appropriate, information via local notice boards, email updates to stakeholders and those who have registered for updates via the website. The communication could also include notifications issued to the local press and, where appropriate, notification letters to local residents and businesses that may be impacted. (2.3.3)

3.2. Essex Police request the inclusion of Community Impact assessments and awareness of potential community disruption from protest related activities to keep all parties safe and prevent any unlawful behaviour. Engagement with Essex Police is requested to ensure the correct policing response is provided.

On-Site Haul Roads (3.4)

All routes will be monitored for dust and control, or suppression methods will be deployed as appropriate through the use of dust suppression water bowsers. (3.4.2)

3.3. Essex Police request an emergency contact number should any concerns be identified, and remedial work be necessary.

Vehicle Cleaning (3.7)

Measures to ensure materials are not transferred onto the highway, such as a wheel and body wash, will be operated at each construction access, Road cleaning will take place when required to remove any deposits that are carried from the site. (3.7.1)

Banks Person (3.8)

A banks person will be used to direct construction vehicles in and out of a VE construction access, where required, in conjunction with any other traffic (3.8.1)

3.4. It would be advantageous to have the persons responsible for vehicle cleaning and vehicle direction to be clearly identified at each site to ensure intervention measures can be quickly coordinated to prevent an increasing risk to public safety. Additionally, should an incident occur it is easy to locate those legally responsible for any investigation.

Vehicle Routing (4.1)

The registration numbers for all HGVs making deliveries would be recorded. Coupled with the HGV monitoring device data (where fitted) outlined above, this would allow a check of any reported breaches of the agreed delivery routes and undertake enforcement action if required. (4.1.3)

3.5. Essex Police request access to this data to ensure complaints received into the Commercial Vehicle Unit are dealt with quickly and proportionately.

The construction of the onshore works will require the delivery of a number of AILs. These are expected to comprise transformers and reactors for the proposed OnSS. (4.1.9)

3.6. These escorts are undertaken by a limited number of highly trained officers. Essex is subject to numerous development projects and Nationally Significant Infrastructure Projects (NSIPs) which are underway or in the planning stages which will directly impact on the ability to service these movements. Essex Police request early engagement to further discuss this matter and analyse AIL movement data to understand the impact on policing and any requirement for further funding.

In terms of an initial assessment, a swept path analysis of the A120 Bentley Road junction has been undertaken, which shows the transformer delivery vehicle would need to turn into Bentley Road from the A120 east via a contraflow using the eastbound carriageway for a section of around 200m. (4.1.13)

3.7. Essex Police request engagement to discuss this matter further to understand the full movement details and if this would require a police escort. Details of frequency and volume is required at the earliest available opportunity to allow coordination to avoid any undue delays to the project.

Once the specific transportation vehicles have been confirmed (post consent), an Abnormal Load Assessment Report (ALAR) will be prepared which will set out the key points and issues associated with the selected route for the AILs, to verify that the route is feasible for the delivery, subject to physical and operational mitigation works. The ALAR will inform the traffic management measures that will need to be identified for the movement of the AIL. (4.1.16)

3.8. Essex Police request engagement following production of the ALAR to ensure awareness of the proposed routes and concerns and allow the Commercial Vehicle Unit (CVU) and ALO to provide appropriate support where required.

To further improve driver information, NH will be approached as operators of Variable Message Signs on the trunk road network to investigate whether existing signs could be used to warn drivers of AILs and to warn them of potential delays. (4.1.18)

3.9. Essex Police fully support the provision of road and traffic related messages to drivers. The strategic road network in Essex (particularly the A120 and A12) are heavily used for transporting goods in and out of the UK. Please note however, these signs are managed by the National Traffic Control Centre (NTCC) in Birmingham and have prescribed messaging only. The Variable Message Signs (VMS) managed by Essex County Council Traffic management could provide a more suitable option and allow awareness of disruption to all road users.

Walking, Cycling, and Horse Rider (WCH) management (4.2)

Where reasonably practicable and where it is safe to do so, the Project will aim to maintain access for WCHs along the public highway at locations such as at construction accesses and haul road crossings. (4.2.1)

Specific locations on the construction vehicle access routes where management measures such as warning signage may be required on the public highway will be identified in the final CTMP(s) and are likely to include: (and not limited to): Bentley Road; B1027 St. John's Road/Valley Road; The circular cycle routes promoted by Essex County Council (See Appendix N of Volume 6, Part 6, Annex 8.1: Transport Assessment); The B1033 Colchester Road at and including the roundabouts with the A133 and B1441; and The B1441 Clacton Road. (4.2.2)

3.10. Essex Police CVU can provide a 'Toolbox Talk' for Professional drivers which involves equine and vulnerable road user input using a 'close pass' mat etc. We would request consideration to provide this input to identified hauliers to offer greater community safety.

Emergency Planning (4.4)

The Principal Contractor(s) will be required to identify a local recovery service which will be used in the event of a contractor vehicle breakdown. (4.4.2)

3.11. The recovery of any vehicle by police will be in line with appropriate legislation and the terms of the contract with Automobile Association Developments Limited (AADL) to deliver the Vehicle Recovery Scheme. The Vehicle Recovery Liaison Officer is responsible for overseeing AADL in managing the Scheme.

Any vehicle recovery coordinated by the Principal Contractor must ensure the service provider identified provides a service equal to or better than the AADL recovery contract to ensure additional congestion and undue costs are avoided.

Policy

The following national and local planning policy references are considered to be relevant to the project. Reference is also made to local design considerations in relation to Essex Police, and **Appendix 1** provides key information on Essex policing priorities and context.

National Policy

The requirement for the Applicant to satisfactorily address the issues raised above is consistent with the Government's policy intentions for the planning process to identify and avoid, reduce, or compensate for adverse social effects to deliver sustainable development, as set out in National Policy Statement for National Networks (2014) and the National Planning Policy Framework (2021).

The National Planning Policy Framework requires planning policies and decisions to achieve healthy, inclusive, and safe places, and consider the support and delivery of local strategies to improve health (social and cultural) wellbeing for all sections of the community.

Local Policy

The Development Plans of the Districts affected by the Order Limits (Braintree District Council for Essex) recognise the essential role played by key social infrastructure providers such as emergency services wherein the maintaining of sufficient operational capacity and resources (and infrastructure provision) in conjunction with major development is considered to be necessary in order to deliver sustainable development.

Essex Design Guide

The Essex Design Guide⁴ provides high level direction for new developments and infrastructure within Essex and includes the strategic development principles from Essex Emergency Services.

Crime is forever changing and so are the needs and expectations of policing. Essex Police advocates to continuously adapt and reflect its practices, to ensure that the service provided is efficient and effective in keeping the residents of Essex safe. By working directly with developers and local planning authorities, we can collectively make new and existing communities and infrastructure as safe as they can be,

⁴ [Home | Essex Design Guide](#)

delivering real benefits to the residents of Essex as well as those who visit for business or leisure activities.

We see this engagement as an enabler to inform strategic demand and resource allocation and management planning linked to future development and growth. Our aims and objectives include:

- Understanding long term need and trends.
- Scoping how our current models of delivery respond to this need.
- Developing how we align closer with our Emergency and Community based partners.
- Making the best use of public estate collaborating where beneficial.
- Feeding into master plans and larger planned developments at the early stages.
- Working with councils and developers for a joint approach to what our needs would be and aligning to long term strategy development.
- Feed into guidance for developers and planners.
- Build consultative links with Planning Authorities.
- Share developing long term strategies and needs for Emergency services provision.
- Building an evidence base for predictive demand and risk.
- Mapping our current provision to identify estate requirements that reflects our changing delivery models.

Conclusion

As key social infrastructure providers, emergency services and interested parties in this DCO process, Essex Police has identified the Five Estuaries Offshore Wind Farm project as having considerable impact on its operations, service capacity and resources requiring appropriate mitigation and management measures.

Essex Police request engagement with the applicant with the aim of reaching substantive agreement on the main issues via a Statement of Common Ground, with any outstanding matters to be discussed and agreed during the Examination.

We look forward to receiving an acknowledgement in respect of these representations. Please send this and any future correspondence to: Strategic.planning@essex.police.uk

Appendix 1

Information on Essex policing priorities and context.

PFCC Police and Crime plan 2021 - 2024

The Police and Crime Plan sets out the policing priorities and aims for keeping Essex safe. It brings together police, partners, and the people of Essex to build safe and secure communities, thereby promoting public confidence in the police and ensuring that victims are satisfied with the service and support they receive. The commitments set out in the plan build on existing partnerships and seek to develop them in new and ambitious ways. These include greater collaboration between police and fire and closer working with local councils, community safety partnerships, and the voluntary, community and health sectors.

The Police and Crime Plan 2021 – 2024 will make a strategic commitment to prevention, a shift in our main effort from rapid response into a model of targeted prevention and early intervention. This is the approach that will help us get crime down across Essex.

We also need to protect the vulnerable from being preyed on by County Lines gangs, we need to protect people in their homes from domestic abuse and we need to protect women and girls from violence and abuse on our streets. By working together, we can identify where people are most at risk and deliver effective interventions to keep them safe.

The twelve plan priorities:

- Further investment in crime prevention
- Reducing drug driven violence
- Protecting vulnerable people and breaking the cycle of domestic abuse
- Reducing violence against women and girls
- Improving support for victims of crime
- Protecting rural and isolated areas
- Preventing dog theft
- Preventing business crime, fraud, and cyber crime
- Improving safety on our roads
- Encouraging volunteers and community support
- Supporting our officers and staff
- Increasing collaboration

Essex Police Force Plan

Essex Police force priorities are drawn from the Police, Fire and Crime Commissioner's (PFCC) Police and Crime plan, as we are rightly accountable to the PFCC as our locally elected authority. The plan provides our main effort, which helps us focus our energies on our priorities and think about helping victims, identifying vulnerability, preventing violence, and being visible in everything we do, whatever role we do to ensure we:

- Help people: Deliver the best possible service prioritising threat/harm/risk and putting victims at heart of what we do.
- Keep people safe: Prevent crime, protect the vulnerable, keep our communities and people safe and work with partners to do this.
- Catch criminals: Identify suspects and bring them to justice targeting the most harmful and paying attention to the needs and views of victims.

Document end