



**Norwich to Tilbury Grid Reinforcement Project
National Grid Development Consent Order Application EN020027**

Essex Police and Suffolk Constabulary

Joint Forces Response to the Examining Authority's written questions and requests for information (ExQ1) Issued on 20 March 2026

Essex Police and Suffolk Constabulary (the "**Joint Forces**") note that the Examining Authority's ("**ExA**") questions focus on specific issues including ALL movements, mitigation measures, and community engagement. The Joint Forces have responded to these directly; however, for completeness we also signpost the wider policing impacts and outstanding matters between the Applicant and Joint Forces. These wider matters - including incident management arrangements, community liaison requirements, construction workforce impacts, protest and security considerations, cumulative project effects, and the need for a structured communications and notification protocol - are of critical significance and it is essential that these are secured in order to ensure safe and deliverable construction operations.

Where relevant, these wider matters are referenced in our answers to provide necessary context and to ensure that the ExA has a full understanding of the policing implications of the Norwich to Tilbury Grid Reinforcement Project (the "**Project**"). The Joint Forces consider it of paramount importance for these matters to be resolved and appropriately secured before the close of the Examination.

The Joint Forces approach is consistent with the Department for Energy Security & Net Zero Overarching National Policy Statement for Energy (EN1) November 2023, which identifies traffic and transport, including abnormal loads generated during the construction phase, as an impact where the Secretary of State recognises the need for appropriate mitigation to ensure satisfactory arrangements – in consultation with network providers and the responsible police force.

Schedule of Engagement between the Joint Forces and National Grid

The Joint Forces have maintained extensive and sustained engagement with National Grid (the "**Applicant**") throughout the pre-application and examination stages of the Project. We have included below a schedule which sets out the key meetings and liaison that has taken place with the Applicant

and from time to time, with its proposed contractor . This record demonstrates the significant and repeated efforts made by the Joint Forces to engage constructively with the Applicant and to communicate the policing requirements necessary for the safe and lawful delivery of the Project.

September 2024 (x 2 meetings) — Early engagement. The Applicant's project team was made aware of the need to provide data regarding early indications of volume and timeframes of movements, and requirements for police escorted loads (including resourcing).

March 2025 — Meeting with the Applicant to discuss AIL management and proposed routes, including resourcing requirements for police escorted movements.

April 2025 (x 3 meetings) — the Applicant provided route packs for Essex, Thurrock, and Suffolk with indicative routes and movements reviewed (over three meetings with local authority teams present). The Joint Forces raised concerns over the outline AIL movements and the absence of confirmed ports of origin and scheduling.

May 2025 — Meeting with the Applicant to discuss AIL management and proposed routes, including resourcing requirements for police escorted movements.

July 2025 (x 2 meetings) — Meetings with the Applicant to discuss AIL management, resourcing requirements (including funding and timelines), engagement, and the Statement of Common Ground process. Feedback provided by the Joint Forces on proposed AIL routes (relating to risk). Discussions regarding concerns on current scheduling. The Applicant proposed monthly project meetings from this point.

August 2025 — Meeting with the Applicant who advised that an AIL route update would follow and that discussions were underway with the contractor.

October 2025 — Meeting with the Applicant who advised that the onboarding of the contractor process was taking longer than expected but would arrange a call between the Joint Forces and its contractor as soon as possible. Great Grid Partnership contractors confirmed as Laing O'Rourke, Morgan Sindall Infrastructure, Morrison Energy Services, Murphy and Omexom/Taylor Woodrow. Feedback on AIL responses discussed, with main issues highlighted for escalation to contractors.

November 2025 — Meeting with the Applicant. A meeting was to be arranged with the contractor to discuss AIL aspects. A December meeting was moved to January to allow contractors to be present; the January meeting was not arranged.

February 2026 — Meeting with the Applicant who introduced the Great Grid Partnership (GGP) as the contractors. An action was set by the Applicant /GGP to provide an updated delivery schedule and (if possible) an indication of port of origin to enable the Joint Forces to update its modelling by 27 March 2026. This information has not been received.

Despite this extensive programme of engagement, critical information remains outstanding and the Joint Forces' core information requirements to determine the likely resourcing requirements and additional service capacity needed (to be secured by a planning obligation) have not been satisfactorily addressed or resolved. The Joint Forces have at all times engaged constructively and in good faith, and will continue to do so; however, the position as set out in the responses below reflects the reality that, notwithstanding the significant efforts described above, the Applicant has not yet provided the information or commitments necessary to enable the Joint Forces to confirm that the Project can be delivered safely.

Safety and security

SS 1.4 **Question to: Suffolk Constabulary, Essex Police Emergency services – mitigation**

Please review and provide comments on the applicant's response to your submissions at OFH1 [[REP1-140](#)] and [[REP2-023](#)], in particular regarding your requests for proposed mitigation beyond what is set out in the outline CoCP appendix E (community engagement and public information) [[APP-305](#)] and the outline construction traffic management plan [[APP-309](#)] (including an incident management plan).

The Joint Forces have reviewed the Applicant's responses and are clear that, whilst the outline Code of Construction Practice appendix E (CoCP - APP305) and outline Construction Traffic Management Plan (CTMP - APP309) set a broad framework, they fundamentally fail to secure the policing-critical mitigations required for safe implementation of the Project. These mitigation requirements have been consistently and clearly communicated by the Joint Forces through pre-application and examination stage representations and engagement. In summary:

- The outline CTMP makes no reference to the role of the Police in implementation and enforcement of traffic management measures. This omission is unacceptable. The Applicant appears to imply that it will be able to enforce traffic measures without police involvement, which is factually and legally incorrect. All impacted police forces will bear the responsibility for enforcing and implementing traffic management measures, and the Joint Forces are deeply concerned that this fundamental reality is not acknowledged.
- The Joint Forces note that the Outline CTMP's provisions on AIL movements are wholly inadequate, being limited to high-level notification and embargo adherence rather than secured mitigation. The CTMP states that blue-light services will be given written notification of AIL deliveries and kept informed, and that any local embargo hours will be adhered to unless agreed otherwise. Notification alone is not mitigation and does not address the operational and legal controls required for high-risk AIL movements.
- The CTMP records an assumption that certain loads may require both private escort vehicles and police escort, and that escort requirements may "vary" pending further clarification. This is wholly insufficient for examination purposes and cannot be left unresolved. The CTMP does not set out the criteria for determining when a movement requires a police escort, the police role in agreeing escort requirements and operational feasibility, nor the lawful basis for any dynamic traffic control measures required to move these loads safely on live networks.
- The Joint Forces each have a statutory duty to uphold the law and protect the community. Where an AIL movement requires dynamic traffic control (including stopping or directing traffic/pedestrians, managing live carriageways, or other manoeuvres requiring police powers and exemptions), there is no lawful alternative to police escorting. This is not a matter of preference; it is a matter of law. When escorting AIL's, the Joint Forces exercise powers including (but not limited to):
 - o Section 163, Road Traffic Act 1988 – power to stop vehicles
 - o Section 37, Road Traffic Act 1988 – power to direct pedestrians
 - o Regulation 12, Motorways Traffic Regulations 1982 – control of motorway lanes
 - o Section 87, Road Traffic Regulation Act 1984 – police exemptions from speed limits

	<p>These powers are not available to private escorts or Community Safety Accreditation Scheme (CSAS) personnel. Any attempt to manage live traffic without such authority would be unlawful and unsafe. Where a police escort is required for safety and lawful traffic control, there is no alternative - this, together with resourcing for the Joint Forces, must be explicitly secured through the DCO/Deed of Planning Obligation and cannot under any circumstances be left to assumptions or informal arrangements.</p> <ul style="list-style-type: none"> - The outline CTMP signposts an Incident Management Plan, but this is not yet sufficiently detailed to evaluate from a policing perspective. The Joint Forces require that the Applicant secures a pre-commencement incident response and management plan to include construction phase incident management and community impacts such as protest-related activity, wilful obstruction of highway and road traffic collisions, and any other factors which will lead to increased police/emergency service demand, requiring mitigation, management and monitoring measures. This is not a request that can be deferred; it is essential to the safe delivery of the Project. - The Joint Forces further require a Security Partnership Working Group to be established to ensure the management of such aspects during the construction phases, with the relevant local police forces secured as a mandatory stakeholder. - The Joint Forces acknowledge the communication proposals set out in the Outline CoCP Appendix E (Community Engagement and Public Information). While Appendix E provides a baseline level of community relations, public information, and outline complaints procedure, it is plainly insufficient to secure the specific measures required to support public confidence, mitigate avoidable policing demand, and ensure safe and coordinated operations during the construction phase. The Joint Forces require that Appendix E (and the associated DCO Requirements) be expanded to include a dedicated Community Liaison Officer to act as a key interface between the project, local communities and emergency services.
<p>SS 1.5</p>	<p>Question to: Suffolk Constabulary, Essex Police, EEAST Emergency services – legal agreement justification</p> <p>The police forces and ambulance service are also asked to provide further justification for their request for a planning obligation (such as a section 106 agreement) and what they would seek to be included in such an agreement, including how it would meet the relevant policy tests (including regulation 122 of the Community Infrastructure Levy Regulations 2010).</p> <p>Whilst this question is directed at those who have made a request for a legal agreement, Norfolk Constabulary are also invited to respond should they wish to do so.</p>

The Joint Police Forces require a planning obligation to ensure that the Project can be delivered lawfully and safely, without diverting core policing resources away from existing public protection duties.

Elements of the Project include the transporting of abnormal indivisible loads on the public highway. Certain of those AILs can only lawfully be escorted by police officers. It is not an optional enhancement but a prerequisite for lawful delivery of the Project.

Where Abnormal Indivisible Load (AIL) movements require a police escort, the escort activity cannot lawfully be undertaken by private escorts or other third parties. The safe execution of such movements requires the exercise of statutory traffic control powers and exemptions that can only be exercised by warranted police officers. This function cannot be delegated and cannot be absorbed within existing policing resources, which are already operating at full capacity

The purpose of the planning obligation is therefore to secure and fund a dedicated police AIL escort capability, including the required lead-in and stand-down periods, officers/staff, vehicles, training, and associated operational costs, solely attributable to the Project. Given the absence of detailed data, particularly in relation to the Port of Origin (i.e. where the AILs will need escorting from), neither of the Joint Forces can estimate the scale of resource required.

The request meets the legal and policy tests of Regulation 122 of the Community Infrastructure Levy Regulations 2010, as amended, and paragraph 58 of the National Planning Policy Framework:

- **Necessary to make the development acceptable in planning terms:** Where police escort for AIL movements is required, it is the only lawful means of delivering the movement safely. Without a police escort, the movements cannot proceed.
- **Directly related to the development:** Resourcing is determined from impact data provided by the Applicant. All costs arise solely from project-driven police escort AIL movements and related risks.
- **Fairly and reasonably related in scale and kind to the development:** Costs will be based on an agreed resourcing model aligned to confirmed AIL movements requiring police escort.

Without such a planning obligation, the Joint Forces will not be in a position to deliver the policing required for the Project and the Applicant will be unable to lawfully deliver AIL movements requiring police escort.

For information, Suffolk Constabulary faced a similar issue in relation to the proposed delivery of Sizewell C, although we note that the promotor of the Sizewell C scheme had provided extensive information in relation to the quantities of AILs requiring escorting. A detailed planning obligation entered into by the project developer of the Sizewell C project and relevant local planning authorities provided for the following insofar as relevant to the funding of the AIL escort teams to be provided by Suffolk Constabulary (note that the Sizewell Planning Obligation contained broader policing requirements, particularly in relation to community policing):

1. ProjectCo must fund Suffolk Constabulary's costs of escorting Abnormal Indivisible Loads (AILs) to the Sizewell C development site by road, with payments made via Suffolk County Council.
2. Initial annual payments of £1,643,226 are payable on or before commencement of the development and on each anniversary thereafter, to fund four AIL escort teams, until both the Sizewell Link Road and the Two Village Bypass are open to the public (these costs are an example only and should not be construed to represent the costs required for this project).
3. Project Co's maximum liability under the initial payment mechanism is capped at £10,000,000.
4. Transitional payment arrangements must be agreed between Project Co and Suffolk Constabulary at least 12 months before both roads open, to cover the remainder of the construction period based on likely escort costs.
5. Suffolk Constabulary has an 18-month mobilisation period following receipt of the first payment, during which it will recruit and train personnel, working closely with Project Co to provide escort services as soon as resources are available.
6. A review mechanism is triggered if both roads are not open by the fourth anniversary of the first payment. Project Co and Suffolk Constabulary must jointly review the payment provisions, having regard to project progress, unspent funds, agreed instalment levels, and anticipated escort requirements.
7. Suffolk Constabulary's obligation to provide escort teams falls away if both roads are not open by the sixth anniversary and the review (and any resulting adjusted funding) has not been completed and paid.
8. Dispute resolution is built in: if the parties cannot agree on adjusted payments within three months of the fourth anniversary, the matter is referred to the Transport Review Group (established by the Sizewell C Planning Obligation), and ultimately (if unresolved within 30 Working Days) treated as a formal Dispute under the deed's dispute resolution clause.
9. Suffolk Constabulary's entitlement to enforce is conditional on it having entered into a Deed of Covenant with Project Co and the local planning authorities.

The Joint Forces recommend that regard be had to the experience from the Sizewell C Project in developing a suitable AIL mitigation and management framework for the Norwich to Tilbury Project.

Traffic and Transport

Question to: The applicant, Suffolk Constabulary, Essex Police, Norfolk Constabulary, Abnormal indivisible loads – 3

<p>TT 1.17</p>	<p>Please confirm the status of negotiations regarding the resourcing of police support for AIL matters. This may be referenced to our question SS 1.5.</p> <p>Engagement between the Applicant and the Joint Police Forces is ongoing; however, it must be clearly understood that negotiations cannot override legal requirements. Safe and lawful delivery of AIL movements requires a minimum 18-month stand-up period with any agreed solution secured well in advance of this to allow for governance, recruitment, training and operational planning.</p> <p>The above position has been consistently and repeatedly communicated by the Joint Forces to the Applicant, and remains non-negotiable. To date, the Joint Forces have been provided with only high-level and indicative AIL movement information, requiring significant assumptions regarding routing and load characteristics. Until confirmed ports of origin, final vehicle specifications, and movement schedules are provided, the Joint Forces cannot finalise risk assessments, operational feasibility, or undertake resource modelling. The continued absence of this information is a matter of serious concern and is impeding progress.</p> <p>The Joint Forces state unequivocally that:</p> <ul style="list-style-type: none"> - Where an AIL movement requires police escort, there is no lawful alternative available. - Private escorting cannot deliver the dynamic traffic control required for such movements. - Without appropriate mitigation and secured resourcing, the Joint Forces will be unable to deliver the policing required for the Project. - Police escorting via lawful Special Police Services arrangements is the only safe, proportionate and legally compliant solution for AIL movements that require police involvement. - There is no alternative mechanism available, and the Applicant must engage with this reality without further delay.
<p>TT 1.20</p>	<p>Question to: National Highways, Suffolk CC, Essex CC, Norfolk CC, Thurrock Council, Suffolk Constabulary, Essex Police</p> <p>Cumulative impacts</p> <p>Are there any specific impacts from other projects which you consider could cause additional impacts and risk to the proposed development and do you consider these have these been addressed adequately by the applicant?</p> <p>The Joint Police Forces identify significant and unresolved cumulative impacts arising from overlapping construction timetables with other major infrastructure projects, including the Lower Thames Crossing, Five Estuaries Offshore Wind Farm, Bramford to Twinstead, and North Falls Offshore Wind Farm (if consent is granted).</p> <p>Concurrent construction activity will result in increased HGV and AIL movements (including police-escorted AIL movements), additional road closures and diversions, and increased pressure on the strategic and local road networks.</p> <p>These cumulative effects will place substantial and potentially unmanageable additional demand on policing resources, incident response capability and emergency service access, particularly where multiple projects generate AIL movements requiring police escort at the same time.</p>

The Joint Forces are firmly of the view that these cumulative impacts have not been adequately addressed by the Applicant and this failure represents a material gap in the application. To ensure lawful and deliverable construction, the Applicant must, as a matter of urgency:

- undertake explicit modelling of overlapping construction and AIL movement scenarios across projects;
- clearly demonstrate how the Incident Management Plan and police resourcing arrangements will operate under cumulative stress; and
- secure robust change-control and escalation procedures to prevent unmanaged overlap of high-risk movements.

Without these measures being secured, cumulative construction activity will materially increase risk to community safety and will render the Joint Forces unable to deliver the policing of the Project alongside other nationally significant developments.