

AENC-NG-CNS-REP-0218

# Norwich to Tilbury

**Volume 8: Examination Documents**

**Document: 8.3.2 Draft Statement of Common Ground - Suffolk  
Constabulary - Tracked Changes Version**

**Final Issue C**

**May 2026**

**Planning Inspectorate Reference: EN020027**

**nationalgrid**

# Revision History

Version	Date	Submitted at
A	26 February 2026	Deadline 1
B	<del>40</del> <u>07</u> April 2026	Deadline 3
<u>C</u>	<u>12 May 2026</u>	<u>Deadline 4</u>

# Suffolk Constabulary

## Draft Statement of Common Ground

### 1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to outline the areas of agreement and any remaining points of discussion between National Grid and Suffolk Constabulary regarding project aspects which may impact Suffolk Constabulary services, such as workforce numbers, incident response and construction traffic movements in relation to the proposed Norwich to Tilbury Project.

The aim is to clarify the shared understanding of any issues and facilitate an efficient resolution process.

### 2. Parties to the SoCG

This SoCG is between National Grid Electricity Transmission plc ('National Grid') and Suffolk Constabulary.

### 3. Summary of matters under discussion

As requested by the Examining Authority, the below table provides an 'at a glance' summary of matters which are under discussion, together with a deadline by which such matters are expected to be resolved.

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>6.1.1 Abnormal Indivisible Load (AIL) Access Approach</u>	<u>Discussions are ongoing between The Applicant and Suffolk Constabulary regarding commitments on information sharing with Suffolk Constabulary, funding for non-core policing activities, and the development of a binding contract with Essex Police governing the operational detail of AIL movements.</u>	<u>Deadline 7</u>
<u>5.1.2 Abnormal Indivisible Load (AIL) Access Routes</u>	<u>Suffolk Constabulary seeks assurance that support will be provided to deal with pressures that AIL movements will impose on police resources. The Applicant accepts that it will meet all necessary and proportionate costs incurred by the police where they relate to non-core policing</u>	<u>Deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
	<u>activities that are necessary for the Project.</u>	
<u>6.1.4 Policy and Legislation</u>	<u>Suffolk Constabulary have no major concerns, but reserve their position pending further review during the Examination process.</u>	<u>Deadline 7</u>
<u>6.1.5 Assessment Methodology</u>	<u>Discussions are ongoing regarding the assessment of impact on emergency services, and what additional capacity Suffolk Constabulary may require.</u>	<u>Deadline 7</u>
<u>6.1.6 Construction Effects</u>	<u>Discussions are ongoing regarding the assessment of impact on emergency services, and what mitigation and monitoring needs to be in place.</u>	<u>Deadline 7</u>
<u>6.1.7 Road Safety</u>	<u>Discussions are ongoing around road safety potential impacts and mitigation, and how Suffolk Constabulary and The Applicant can work together.</u>	<u>Deadline 7</u>
<u>6.1.8 Traffic Management Measures</u>	<u>Agreement on traffic management measures is dependent on confirming AIL movement details. The Applicant will continue to liaise with Essex Police on this matter.</u>	<u>Deadline 7</u>
<u>6.1.9 Traffic Management Implementation and Enforcement</u>	<u>Discussions are ongoing regarding police role in traffic management enforcement and implementation.</u>	<u>Deadline 7</u>
<u>6.1.10 Construction Access Approach</u>	<u>Agreement on construction access approach is dependent on confirming AIL movement details. The Applicant will continue to liaise with Suffolk Constabulary on this matter.</u>	<u>Deadline 7</u>
<u>6.1.11 Primary Access Route Selection</u>	<u>Discussions are ongoing regarding contingency routes and AIL movements.</u>	<u>Deadline 7</u>
<u>6.1.12 TROs and TTROs</u>	<u>Discussions are ongoing regarding enforcement of TROs and TTROs, agreement is dependent on confirming AIL movement details.</u>	<u>Deadline 7</u>
<u>6.1.13 Communications and Notification</u>	<u>Discussions are ongoing regarding communication of AIL movements with the police and how community liaison will be carried out.</u>	<u>Deadline 7</u>
<u>6.1.14 Incident Management</u>	<u>An Incident Management Plan is being prepared, and agreement is dependent this.</u>	<u>Deadline 7</u>

<u>SoCG ID</u>	<u>Summary of matter under discussion</u>	<u>Deadline for resolution</u>
<u>6.1.15 Protest Management</u>	<u>Engagement is ongoing and will continue between The Applicant, Suffolk Constabulary and the Main Works Contractor(s).</u>	<u>Deadline 7</u>
<u>6.1.16-5.1.18 Construction Workforce</u>	<u>Discussions are ongoing; additional details have been provided to Suffolk Constabulary at Deadline 4, and further detail will be provided to Essex Police once available from the Main Works Contractor(s).</u>	<u>Deadline 7</u>
<u>6.1.19-5.1.20 Designing out Crime and Community Engagement</u>	<u>Additional details have been provided by the Applicant to Suffolk Constabulary at Deadline 4; discussions are ongoing.</u>	<u>Deadline 7</u>

## 4. ~~3-~~Background

### 4.1 ~~3.1~~ Description of the Project/Development

National Grid Electricity Transmission plc ('National Grid') owns and maintains the national high voltage electricity transmission network throughout England and Wales. The transmission network connects the power from where it is generated to the regional Distribution Network Operators who then supply businesses and homes.

National Grid holds the Transmission Licence for England and Wales, and its statutory duty is to develop and maintain an efficient, coordinated and economical system of electricity transmission and to facilitate competition in the generation and supply of electricity, as set out in the Electricity Act 1989.

National Grid has developed plans for Norwich to Tilbury (referred to as the 'Project'). The Project would support the UK's net zero target through the connection of new low carbon energy generation in East Anglia and by reinforcing the transmission network.

The Project comprises reinforcement of the transmission network between the existing Norwich Main Substation in Norfolk and Tilbury Substation in Essex, via Bramford Substation, the new East Anglia Connection Node (EACN) Substation and the new Tilbury North Substation.

The reinforcement is needed because the existing transmission network, even with current upgrading, will not have sufficient capacity for the new renewable energy (a substantial proportion of which would be generated by offshore wind) that is expected to connect to the network over the next 10 years and beyond. Completion of the Project, together with other new reinforcements across the country, will meet this future energy transmission demand both in East Anglia and across the UK.

The Project is a Nationally Significant Infrastructure Project (NSIP), and National Grid is seeking development consent under statutory procedures set by government. NSIPs are projects of certain types, over a certain size, which are considered by the government to be

of national importance, hence permission to build them needs to be given at a national level, by the relevant Secretary of State (in this case the Secretary of State for Energy Security and Net Zero). Instead of applying to the local authority for planning permission, the developer must apply to the Planning Inspectorate for a Development Consent Order (DCO) that would grant development consent.

National Grid has submitted an application for development consent to the Planning Inspectorate. The Examining Authority (consisting of five examining inspectors), after a period of public examination, will make their recommendation to the Secretary of State for Energy Security and Net Zero, who in turn will decide on whether development consent should be granted for the Project.

The Project is identified as critical to delivering a network which supports the clean power pathways for 2030 delivery.

The Planning Act 2008 places duties on National Grid as the DCO applicant to consult with prescribed or affected persons as well as to take account of responses to consultation and publicity. In accordance with these statutory requirements, National Grid has undertaken two ~~non-statutory~~non-statutory and one statutory consultation to inform its proposals, with further targeted consultations.

## 5. ~~4.~~ Stakeholder Interests

Suffolk Constabulary is the territorial police force for the county of Suffolk. It is part of the national police force under the Home Office remit. Suffolk Constabulary provides law enforcement, community safety, roads policing and emergency police response services in Suffolk. In relation to Norwich to Tilbury, it is anticipated that Suffolk Constabulary’s role would extend to the safe policing of abnormal loads where required.

### 5.1 Record of Key Engagement

National Grid has engaged with Suffolk Constabulary on the Project throughout the ~~pre-application~~pre-application process. ~~Table 4.1~~Table 5.1 provides an overview of the key engagement that has taken place between National Grid and Suffolk Constabulary.

Table ~~4~~5.1 Summary of Key Engagement between National Grid and Suffolk Constabulary

ID	Date	Format	Topic/Description
	August 2024	Meeting	AIL routes discussion meeting – joint meeting with Suffolk Constabulary and Suffolk County Council to discuss AIL routes.
	April 2025	Meeting	National Grid held a Norfolk County Council AIL Workshop with Suffolk Constabulary present.
	April 2025	Meeting	National Grid held an Essex County Council AIL Workshop with Suffolk Constabulary

		present.
April 2025	Meeting	National Grid held a Suffolk County Council AIL Workshop with Suffolk Constabulary present.
May 2025	Meeting	AIL <del>check-in</del> - <a href="#">check-in</a> - Suffolk Constabulary & Essex Police.
July 2025	Meeting	AIL monthly meeting – Suffolk Constabulary & Essex Police.
August 2025	Meeting	AIL monthly meeting – Suffolk Constabulary & Essex Police.
September 2025	Meeting	AIL monthly meeting – Suffolk Constabulary & Essex Police.
October 2025	Meeting	AIL monthly meeting – Suffolk Constabulary & Essex Police.
November 2025	Meeting	AIL monthly meeting – Suffolk Constabulary & Essex Police.
February 2026	Meeting	AIL strategy meeting – Suffolk Constabulary & Essex Police.
<a href="#">April 2026</a>	<a href="#">Email Correspondence</a>	<a href="#">Deadline 4 SoCG draft shared with Suffolk Constabulary &amp; Essex Police for comment.</a>
<a href="#">May 2026</a>	<a href="#">Meeting</a>	<a href="#">National Grid held a meeting with Suffolk Constabulary &amp; Essex Police to discuss updated SoCG positions and wording. National Grid also met informally with Suffolk Constabulary &amp; Essex Police immediately prior to ISH2.</a>

## 5. ~~Matters Agreed~~

<del>ID</del>	<del>Issue</del>	<del>Agreement reached</del>	<del>Date agreed</del>	<del>Relevant documentation</del>
<del>5.1.1</del>				

## 6. Matters ~~Currently~~ Agreed, Not Agreed or Under Discussion

The below table seeks to summarise Suffolk Constabulary’s key interests in relation to the Norwich to Tilbury project, and how National Grid is addressing those interests.

ID	Matter	National Grid’s Position	Suffolk Constabulary’s Position	Status
<b>Abnormal Indivisible Load (AIL) Access</b>				
6.1.1	Abnormal Indivisible Load (AIL) Access Approach	<p>The approach for Abnormal Indivisible Load (AIL) access to the Project is to utilise designated routes on the local and Strategic Road networks. This approach is set out within <b>Section 5</b> of the <del>Outline CTMP [APP-309]</del> <u>Outline CTMP [APP-309]</u>, and further detailed within the <b>AIL Access Strategy (Appendix A of the CTMP [APP-310]</b> <u>CTMP [APP-310]</u>). A draft version of the <b>AIL Access Strategy</b> was shared with Suffolk Constabulary in March 2025.</p> <p><del>This approach, in principle, is considered suitable for AIL access for the Project at the current stage of project development.</del></p> <p><u>Abnormal Indivisible Load (AIL) vehicles and routes</u></p>	<p><del>As noted above, the AIL access strategy is incomplete. NG and Suffolk Constabulary are not therefore able to agree appropriate mitigation, monitoring and review arrangements on this critical issue.</del></p> <p><del>As suggested at Open Floor Hearing 1 it is considered essential that an issue specific hearing is scheduled to examine the issue of AILs. Suffolk Constabulary considers that the lack of information is sufficiently strong to merit a holding objection until this matter is resolved.</del></p> <p><del>Without prejudice to the above, or to any</del></p>	<p><del>Not agreed</del> <u>Under discussion</u></p>

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		<p><u>have been agreed in principle with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, AIL routes will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routeing or vehicles. This approach, therefore, is considered suitable for AIL access for the Project at the current stage of project development.</u></p> <p><u>As soon as the Project details are further developed and finalised by the Main Works Contractor(s), National Grid and the Main Works Contractor will proactively engage with Suffolk Constabulary to provide it with the necessary information to undertake modelling and operational planning. When the procurement of equipment has been completed National Grid will confirm final details, including the final number and timing of AIL deliveries, the delivery or port-of-origin locations, and the specific routes on which Police escorts will be required.</u></p> <p><u>National Grid and the Main Works Contractor have shared and will share further interim information to support early engagement and allow Suffolk Constabulary to begin developing an initial</u></p>	<p><del>subsequent discussions, Suffolk Constabulary consider that the following is needed:</del></p> <ul style="list-style-type: none"> <li><del>• a formal agreement which includes funding for AIL escort services (supported by sufficient data as to anticipated AIL numbers specifications and requirements so as to permit modelling to be undertaken);</del></li> <li><del>• securing prescribed and appropriate engagement and notice periods for AIL movements (whether by way of supplementary agreement, planning obligation and/or DCO requirement); and</del></li> </ul> <p><u>Suffolk Constabulary note that there are practical issues in providing full information on AILs at this stage. However, Suffolk Constabulary ultimately needs to be kept as informed as possible by the Applicant. Suffolk Constabulary would welcome regular updates on this, even to the extent that the update simply discloses that this issue remains outstanding.</u></p> <p><u>It is to be emphasised that the delivery of AIL escort services is subject to an 18 month stand up period. Therefore, early delivery is required in order to deliver the Q3</u></p>	

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		<p><u>understanding of likely operational requirements ahead of finalised details.</u></p> <p><u>National Grid currently anticipates that the earliest abnormal load movements would commence in Q3 2028 and would be phased over the construction period. On that basis, National Grid expects that the above details—including final AIL numbers, delivery dates, ports of origin and specific routes—will be sufficiently defined and provided to Suffolk Constabulary in Q1 2027. This is intended to ensure that an appropriate lead-in period of 18 months is available in line with Suffolk Constabulary's requirements.</u></p> <p><u>The potential impact of AIL movements on Police resourcing is acknowledged. National Grid accepts that it will meet all necessary and proportionate costs incurred by the Police where they relate to non-core policing activities that are necessary for the Project, including AIL Police escort services, in accordance with section 25 of the Police Act and relevant NPCC guidance. National Grid's position is that these arrangements are most appropriately secured through a binding contractual mechanism with Suffolk Constabulary (aka a 'side agreement').</u></p> <p><u>National Grid will continue to engage with Suffolk Constabulary to agree on funding for non-core Police activities that are necessary for the Project. To secure appropriate engagement and notice periods for AIL</u></p>	<p><u>2028 date and Suffolk Constabulary further invites the Applicant to consider whether it is likely that any AIL movements are reasonably likely to be required before this date (such as to deliver on-site infrastructure), in which case the Applicant will need to ensure that sufficient stand up time is built in to any such escorts.</u></p> <p><u>With respect to funding, Suffolk Constabulary notes that the Applicant has agreed in principle to meet all necessary and proportionate costs associated with the Project that are incurred by Suffolk Constabulary insofar as relate to non-core policing activities that are necessary for the Project, including AIL Police escort services. Suffolk Constabulary will be engaging with the Applicant's legal representatives in due course to further discuss these arrangements. However, Suffolk Constabulary wishes to emphasise that it is critical that such an agreement fully accounts for all operational costs.</u></p> <p><u>Suffolk Constabulary will seek to engage further with respect to the Construction Traffic Management Plan and consider that precise requirements can be agreed</u></p>	

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		<p><u>movements, National Grid proposes a combination of:</u>  <u><b>Commitments within the Outline Construction Traffic Management Plan</b></u> (secured by Requirement 4 of <u><b>3.1 Draft DCO [APP-056, now superseded by REP2-004]</b></u>), including provisions for ongoing liaison, forward planning and information sharing; and  <del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u><b>A binding contract with Suffolk Constabulary</b></u>, which will govern the operational detail of AIL movements, including notice periods, escort requirements and associated costs.</p>	<p><u>at a later stage. However, Suffolk Constabulary emphasises that these commitments need to be meaningful and ultimately implemented.</u>  <u>Suffolk Constabulary wishes to reserve its position more broadly as to the extent of any rights, powers or obligations that would need to be reserved under the terms of any s106 agreement. The following non-exhaustive and without prejudice list sets out potential mitigation that may be necessary to be secured in a s106 agreement:</u>  <u>Construction phase incident management and community impacts.</u>  <u>The impact caused by the increased population to facilitate construction workers.</u>  <u>The establishment of a Transport, Community Safety and Cohesion Working Group.</u>  <u>Impact on crime, community safety and policing more broadly, including from any additional burden on the Joint Forces that is separate from the AIL impact.</u>  <del>• details from National Grid of ports of origin and the routes on which police escorts will be required.</del> <u>It also may be appropriate</u></p>	

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6.1.2	Abnormal Indivisible Load (AIL) Access Routes	<p>Routes proposed to be utilised by AILs are shown in the <b>AIL Access Strategy (Appendix A of the <del>CTMP</del> <del>CTMP [APP-310]</del> <u>APP-310</u>)</b>.</p> <p>These have been developed following consultations with Suffolk Constabulary. As part of these consultations, draft route information was shared in April 2025.</p> <p><del>National Grid will continue to engage with Suffolk Constabulary as the proposed AIL access routes are developed further, including with respect police force resourcing implications associated with the routes considered.</del></p> <p><u>Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, AIL routes will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture</u></p>	<p><u>to include within the s106 agreement an obligation to enter into the funding agreement for AIL services where such agreement is not likely to be concluded prior to the end of examination.</u></p> <p>Suffolk Constabulary reserves its position and notes its reply above.</p>	<p><del>Not-agreed</del><u>Under discussion</u></p>

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		<p><a href="#">and assess any changes to routing or vehicles.</a></p> <p>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>		
6.1.3	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	<p>The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the <del>7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans</del> <a href="#">7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans</a> [APP-<del>312-312</del>, APP-<del>313-313</del>, APP-<del>314-314</del>, APP-<del>315-315</del>, APP-<del>316-316</del>, APP-<del>317-317</del>, APP-<del>318-318</del>, APP-<del>319-319</del>]. These mitigation measures are considered suitable and sufficient for the delivery of the Project.</p> <p><a href="#">The potential impact of AIL movements on Police resourcing is acknowledged. National Grid accepts that it will meet all necessary and proportionate costs incurred by the Police where they relate to non-core policing activities that are necessary for the Project, including AIL Police escort services, in accordance with section 25 of the Police Act and relevant NPCC guidance.</a></p> <p><del>Management</del> <a href="#">The management</a> measures relevant to AIL movements <del>are</del> discussed within <b>Section 5</b> of the <b>CTMP</b>, and the <b>AIL Access Strategy (Appendix</b></p>	<p>Suffolk Constabulary reserves its position and notes its reply above.</p> <p><a href="#">Notwithstanding this</a>, Suffolk Constabulary <del>further notes that there is no reference in the CTMP or AIL Access Strategy to securing funding for police involvement or acknowledgement of the pressure that AIL movements will impose on police resources. Assessment of mitigation measures therefore remains incomplete and inadequate given that significant information is currently not included in the project documentation</del> <a href="#">will seek to engage further with respect to the Construction Traffic Management Plan and considers that precise requirements can be agreed at a later stage. However, Suffolk Constabulary emphasises that these commitments need to be meaningful and ultimately implemented.</a></p>	Not-agreed <a href="#">Under discussion</a>

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<p><del>A of the Outline CTMP [APP-310]). This approach</del> <u>Outline CTMP [APP-310]) are</u>, in principle, <del>is</del> considered suitable for AIL access for the Project at the current stage of project development. <u>As details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, this approach will be developed further. National Grid will continue to support Suffolk Constabulary's planning through information exchanges and further engagement on this matter.</u></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u>Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, AIL routes will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routing or vehicles.</u></p>				
<p><b>Construction Traffic Impacts</b></p>				
6.1.4	Policy	The policy context, legislation and guidance considered	<u>Please note that Suffolk Constabulary's</u>	Under

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	and Legislation	<p>when undertaking the Traffic and Transport assessment is presented in <del>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</del> <b>Chapter 2 (Key Legislation and Planning Policy Context) [APP-126]</b> and <b>Section 16.2 of Chapter 16 (Traffic and Transport) [APP-271]</b> <del>Chapter 16 (Traffic and Transport) [APP-271]</del> of the <b>Environmental Statement (ES)</b>.</p> <p>All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment.</p> <p><u>National Grid acknowledges the policy documents and comments made by Suffolk Constabulary in their Relevant Representation and is considering their request whilst mindful of its regulatory duties.</u></p>	<p><u>position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary has reviewed the policy context, legislation and guidance identified by National Grid.</p> <p>Whilst no obvious omissions have been identified at this stage, Suffolk Constabulary reserves its position in respect of policy and legislation pending further review during the Examination, if any omissions become apparent.</p>	discussion
6.1.5	Assessment Methodology	<p>Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in <b>Section 16.4 of Chapter 16 (Traffic and Transport)</b> of the <del>ES</del> <b>ES [APP-271]</b> <del>APP-271</del>. The key parameters and assumptions presented are considered appropriate.</p> <p><u>As part of the project's scoping and assessment work, an assessment of intra-project cumulative effects, undertaken in accordance with <b>6.19 Scoping Report [APP-288 to APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b>, is presented in <b>6.17 Environmental Statement Chapter 17 -</b></u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary notes that the impact on emergency service response is not sufficiently scoped into the assessment, including how the scheme will impact</p>	Under discussion

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		<p><u><a href="#">Cumulative Effects [APP-281], which also assesses inter-project cumulative effects from clusters of other developments.</a></u></p> <p><u><a href="#">Furthermore, understanding impacts and past experience of abnormal load management from other NSIPs is an area which has been the subject of engagement to-date and is something the Applicant would welcome further discussion on, where applicable.</a></u></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del><u><a href="#">The impact on Police resourcing is acknowledged, and National Grid has held regular meetings with Suffolk Constabulary and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts. As details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, National Grid will continue to support Suffolk Constabulary's planning through information exchanges and further engagement. Where practicable, additional mitigation may be provided through engagement with the relevant highway authority.</a></u></p>	<p>the reliability of emergency service responses.</p> <p>Suffolk Constabulary submitted representations in July 2024 in response to NG's statutory consultation, identifying its areas of principal interest and concern from an operational perspective. This requested that the Environmental Assessment and/or accompanying Technical Assessment scoping and assessment work identify the likely effects (impacts) of AIL's, mobile cranes/ machinery and HGV traffic generation on the Constabulary's operations.</p> <p>This work has not been carried out to date, and the scoping and assessment work is therefore considered to be incomplete.</p> <p>Suffolk Constabulary therefore emphasise that to the extent that any mitigation measures are agreed on the basis of the assumptions and assessments made by National Grid at this stage, appropriate mechanisms will need to be in place to ensure that these measures remain sufficient as the Project evolves.</p> <p>As a general point, Suffolk Constabulary envisage mitigation for the likely project</p>	

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6.1.6	Construction Effects	<p>The assessment of effects during construction is presented in <b>Section 16.7 (Residual Effects) of Chapter 16 (Traffic and Transport)</b> of the <b>ES-ES [APP-271APP-271]</b>. The assessment of effects during construction presented is considered appropriate.</p> <p><u>The identified effects on Traffic and Transport in Section 16.7 would be monitored throughout the stages of the design and construction to avoid and minimise any additional new effects by the Main Works Contractor(s). Additional mitigation where practicable may be provided through engagement with the relevant highway authority. This includes monitoring of delay/congestion at junctions.</u></p> <p><u>The impact on Police resourcing is acknowledged, and National Grid has held regular meetings with Suffolk Constabulary and will continue to engage to agree on the most appropriate and effective way to address the anticipated demand for AIL escorts. As details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, National Grid will</u></p>	<p>impacts arising on its operational capacity being in the form of a DCO Requirement(s), developer funding secured via a planning obligation and supplementary agreement, as required.</p> <p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>As noted above, the construction phase scoping and assessment work is considered to be incomplete in respect of the potential effect (impact) of the Project on Suffolk Constabulary's operational capacity and resources.</p> <p>Suffolk Constabulary considers that it will inherently be required to play a role in ensuring that traffic and transport effects remain tolerable and acceptable, and this should be reflected in the mitigation measures and resourcing arrangements. This will ultimately need to be addressed by ensuring that appropriate monitoring and review mechanisms are in place</p>	Under discussion

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		<p><u>continue to support Suffolk Constabulary's planning through information exchanges and further engagement.</u></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u>Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, AIL routes will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routeing or vehicles.</u></p>	<p>to ensure that the originally proposed mitigation measures remain appropriate, and to factor in how additional mitigation may be required in the event that construction effects are worse than originally forecasted.</p> <p>Suffolk Constabulary considers that it would play a key role in a construction working group to ensure that mitigation measures are monitored and remain appropriate during the lifetime of the construction phase.</p>	
<b>Construction Traffic Management</b>				
6.1.7	Road Safety	<p>An assessment on road safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in <b>Section 4 (Baseline Conditions)</b> of the <del>Transport Assessment (TA)</del> <b>[APP-333 Transport Assessment (TA) [APP-333]</b>. Collisions clusters have been identified along road links forming the PARs, based on existing baseline characteristics. A calculation of the accident rate per billion vehicle kilometres has been carried out on the road links forming the PARs to compare against</p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>As above, any mitigation measures must be contingent upon the completeness and accuracy of the underlying assumptions</p>	Under discussion

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		<p>the national statistics.</p> <p>Areas where potential road safety issues have been identified, as set out within <b>Section 7 (Transport Assessment)</b> of the <b>TATA [APP-333APP-333]</b>, will be highlighted within the Driver's pack as part of mitigation measures secured within the Outline Construction Traffic Management Plan (Outline <b>CTMPCTMP</b>) <b>[APP-309APP-309]</b>. The assessment methodology used is considered appropriate.</p> <p>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>	<p>in the assessment.</p> <p>Whilst National Grid notes that the assessment 'thoroughly identifies the potential impact of the Project', Suffolk Constabulary notes that position is premised on an incomplete scoping and assessment of the likely effects (impacts) on the Constabulary's operations.</p> <p>In addition, it is not feasible to thoroughly identify risk without appropriate monitoring and review mechanisms in place, as risk inherently will change as the construction phase reaches different milestones.</p> <p>Suffolk Constabulary welcomes the opportunity to work with National Grid on the inclusion of any planning obligations and/or DCO requirements which appropriately secures road safety matters. For example, Suffolk Constabulary considers that the following would be appropriate:</p> <ul style="list-style-type: none"> <li>• securing a commitment from National Grid to operate thorough driver induction programmes, which emphasise road safety risks and embed information regarding collision cluster locations;</li> <li>• securing formal</li> </ul>	

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			<p><del>route-specific</del><u>route-specific</u> controls, which are included in the final Construction Traffic Management Plan (as opposed to simply being outlined at a high level in the TA); and</p> <ul style="list-style-type: none"> <li>generally permitting Suffolk Constabulary to input into the driver induction process (including any driver packs and delivering toolbox talks) to ensure legitimacy and an emphasis on safety and welfare, as well to be viewed as a key stakeholder for consultation purposes on all road safety documentation.</li> </ul>	
6.1.8	Traffic Management Measures	<p>Details of the proposed traffic management measures are set out in <b>Section 5.8</b> of the <del>CTMP</del><u>CTMP [APP-309APP-309]</u>. These traffic management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts.</p> <p>Suffolk Constabulary's comments are noted, and <del>National Grid</del><u>as details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, the Applicant will continue to engage with support Suffolk Constabulary on this matter</u><u>Constabulary's planning through</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>In the absence of a definitive position on the specific (as opposed to generic) ports of origin, AIL transport routes, AIL numbers and specification, NG and Suffolk Constabulary are not yet in a position to agree suitable traffic management measures for AIL's.</p>	Under discussion

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		<a href="#">information exchanges and further.</a>	<p>Whilst Suffolk Constabulary cannot therefore agree the proposed traffic management measures for AIL's it would welcome discussion with National Grid on devising an appropriate mitigation, monitoring and review mechanism for addressing the likely construction phase impacts from AIL's to help ensure that the Constabulary's operational capacity is maintained over the construction period.</p> <p>Further consideration could be given to the matter at an Issue Specific Hearing, as required, and as the Project develops.</p> <p>Further to this, Suffolk Constabulary requests that a formal emergency services protocol is secured as part of the construction traffic management plan to include (amongst other matters):</p> <ul style="list-style-type: none"> <li>• passage arrangement for emergency services;</li> <li>• escalation routes for emergency services;</li> <li>• formal traffic forums / management groups with Suffolk Constabulary in attendance; and</li> <li>• rights of consultation and approval for Suffolk Constabulary to ensure</li> </ul>	

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6.1.9	Traffic Management Implementation and Enforcement	<p>The implementation and enforcement process set out in <b>Section 6</b> of the Outline <del>CTMP [APP-309]</del>CTMP [APP-309] is considered appropriate and adequate for the Project.</p> <p>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>	<p>the final Construction Traffic Management Plan is workable.</p> <p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary notes that Section 6 of the CTMP makes no reference to the role of the police in implementation and enforcement of traffic management measures.</p> <p>From this absence, National Grid appears to imply that it will be able to enforce traffic measures without police involvement, which is clearly not correct. All impacted police forces will bear the responsibility for enforcing and implementing all traffic management measures, and Suffolk Constabulary is disappointed that this is not acknowledged.</p> <p>In addition to the CTMP being updated to reflect the role of policing, Suffolk Constabulary further requests to be named</p>	Under discussion

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6.1.10	Construction Access Approach	<p>The approach for construction access for the Project is proposed to utilise designated routes for construction traffic on local roads. These are defined as 'Primary Access Routes' (PARs) within <b>Section 5</b> of the Outline <del>CTMP</del>CTMP [<del>APP-309</del>APP-309]. This approach is considered suitable for construction traffic for the Project.</p> <p><u>Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, AIL routes will be secured with all</u></p>	<p>as a consulted stakeholder in the <del>non-compliance</del>non-compliance procedure and change process, as well as in agreeing minimum notice periods (to ensure that community tension is minimised and that the police can resource enforcement).</p> <p>Furthermore, Suffolk Constabulary understand that National Grid places some reliance on a worker code of conduct. However, it is again critical to emphasise that any substantial misconduct will ultimately be enforced by the police.</p> <p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>In light of the incomplete AIL access strategy outlined above, Suffolk Constabulary reserves its position on the suitability of the construction access approach pending further information and engagement from National Grid.</p>	Under discussion

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		<p><a href="#">stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routeing or vehicles.</a></p> <p><a href="#">Contingency routes and their routes are outlined in Section 5 of the <b>Outline Construction Traffic Management Plan [APP-309]</b>, and will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police.</a></p> <p><a href="#">An assessment of cumulative effects undertaken in accordance with <b>6.19 Scoping Report [APP-288 to APP-296]</b> and <b>6.20 Scoping Opinion [APP-297]</b> is presented in <b>6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281]</b> which also <a href="#">assesses inter-project cumulative effects from clusters of other development including NSIPs.</a></a></p> <p>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>	<p>Suffolk Constabulary further requests confirmation that contingency routes are to be defined in a formal document, with an assessment carried out to ensure the appropriate risk of these routes is considered alongside any corresponding mitigation measures that may be necessary.</p> <p>In addition, because of the number of NSIPs in the vicinity of the Project, Suffolk Constabulary invite National Grid to consider further whether the cumulative effect has been fully considered with respect to the issues of construction traffic.</p>	
6.1.11	Primary Access Route Selection	<p>Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the <del>7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans</del> <a href="#">7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans [APP-312-312, APP-313-313, APP-314-314, APP-315-315,</a></p>	<p><a href="#">Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</a></p>	Under discussion

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		<p><del>APP-316-316, APP-317-317, APP-318-318, APP-319]-319].</del>  <a href="https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000190-7.3">https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000190-7.3</a> <u>Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Guide to the Plans and Master Key Plan.pdf</u>. These PARs are considered suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the Outline <del>CTMP [APP-309]</del> <u>CTMP [APP-309]</u>.  <u>National Grid has engaged and will continue to engage with Suffolk County Council as the Local Highway Authority with regards to Road Safety Audits (RSA). Stage 1 RSAs have been carried out and designer response reports prepared, as outlined in 7.11 Transport Assessment – Appendix A – Norwich to Tilbury RSA Strategy [APP-334].</u>  <u>Contingency routes and their routes are outlined in Section 5 of the Outline Construction Traffic Management Plan [APP-309], and will be provided by pre-established traffic diversions and diversions as set out by National Highways, the relevant highway authorities and the police.</u>  <del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u>Abnormal Indivisible Load (AIL) vehicles and routes have been agreed in principle</u></p>	<p>In light of the incomplete AIL access strategy outlined above, Suffolk Constabulary reserves its position on the suitability of the Primary Access Routes pending further information and engagement from National Grid. Suffolk Constabulary requests further evidence that a full road safety audit has been undertaken. It also requires details of specific mitigation proposed in respect of Suffolk, including whether any proposed contingency routes have been assessed both in terms of access issues and escort feasibility. Without full information to this effect, it is not possible for Suffolk Constabulary to reach a full view on this issue.</p>	

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		<p><u>with National Highways and the Local Highway Authorities through consultation. However, formal AiP's have not been agreed yet as they are conditional on structural assessment of bridges and other drainage features, which is currently ongoing. Ultimately, ALL routes will be secured with all stakeholders through the Electronic Service Delivery for Abnormal Loads (ESDAL) process. This will capture and assess any changes to routing or vehicles. National Grid will continue to engage with Suffolk Constabulary on this matter.</u></p>		
6.1.12	Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs)	<p>Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the <b>Traffic Regulation Order Plans Sections A, B, C, D, E, F, G, H</b> [<del>APP-025, APP-026, APP-027, APP-028, APP-029, APP-030, APP-031, APP-032A</del> <b>to H</b> [<del>APP-025, APP-026, APP-027, APP-028, APP-029, APP-030, APP-031, APP-032</del>] and set out in <b>Schedule 13 to the <del>draft Development Consent Order (DCO)</del> [APP-056] draft Development Consent Order (DCO) [APP-056]</b>:</p> <ul style="list-style-type: none"> <li>● <b>Part 1 -- Temporary Restriction of Waiting and Restriction of Speed.</b></li> <li>● <b>Part 2 -- Permanent Restriction of Waiting and Restriction of Speed.</b></li> <li>● <b>Part 3 – Temporary Restriction of Access.</b></li> </ul>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary reserves its position pending further information. Suffolk Constabulary notes that it (and other police forces) will ultimately bear responsibility for enforcement of TROs and TTROs, which will place additional pressure on police resources. This should be acknowledged and addressed through appropriate resourcing arrangements.</p>	Under discussion


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		<p>◆ <b>Part 4 – Temporary no Overtaking Order.</b> These are considered suitable and sufficient for the delivery of the Project. Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>	<p>In addition to this, police engagement will be critical in ensuring that the TROs/TTROs are effective, appropriate and enforceable/enforced. It is to be noted that it is not feasible to make assumptions and assessments as to what is a safe road speed as each individual road is unique. Suffolk Constabulary, and other relevant police forces, have detailed experience in this area and National Grid will need to work with the local police forces to ensure that the speed restrictions and traffic orders are suitable and appropriate for each individual route/road. Considering this, National Grid need to propose a formal working group to secure police engagement to ensure that these proposed mitigation measures are effective and appropriate.</p>	
<b>Incident Management</b>				
6.1.13	Communications and Notification	<p>The approach to providing communications and notification to Suffolk Constabulary is set out in <b>Section 5.10</b> of the Outline <del>CTMP</del><u>CTMP</u> [<del>APP-309</del><u>APP-309</u>]. This framework is to be adopted and updated by the Main Works Contractor(s) and is considered to be suitable and appropriate for the present stage of project development.</p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p>	Under discussion

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		<p><u>The impact on Police resourcing is acknowledged, and engagement to-date has highlighted the importance of appropriate lead-in times. As details of the Project are developed further and finalised by the Main Works Contractors(s) such as construction programming, sourcing of materials and AIL delivery/Port of origin locations, National Grid will continue to support Suffolk Constabulary's planning through information exchanges and further engagement.</u></p> <p>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</p>	<p>The CTMP does not reference or factor in the 18-month <del>lead-in</del><u>lead-in</u> time required for AIL operations, nor the requirement for training of a dedicated AIL team.</p> <p>Whilst Suffolk Constabulary acknowledges the commitment to provide notice as early as practicable, a formal framework agreement between National Grid and Suffolk Constabulary will likely be required to deliver these arrangements effectively.</p> <p>In addition to this, and to support effective incident management and mitigate potential community impacts during the construction phase, it is recommended that a dedicated National Grid Community Liaison Officer is appointed to act as a key interface between the project, local communities and emergency services.</p> <p>Considering the above, Suffolk Constabulary requires that a commitment is secured by way of a requirement in the DCO as to the notification and communication requirements for ensuring sufficient liaison with police forces.</p>	
6.1.14	Incident	<b>Section 5.10</b> of the <u>developed 7.3 Outline</u>	<u>Please note that Suffolk Constabulary's</u>	Under

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	Management	<p><del>CTMP</del><b>Construction Traffic Management Plan [APP-309-309]</b> establishes that the Main Works Contractor(s) <del>is anticipated to</del>will develop an Incident Management Plan in consultation with Suffolk Constabulary, alongside other emergency service Stakeholders <u>where required</u>. This would be intended to establish agreed procedure(s) to manage any incidents which may occur on the sections of the highway network proposed to be utilised by the Project.</p> <p><u>National Grid has engaged and with the Police, Fire and Ambulance services, the local highway authorities and National Highways and has assessed the impact of the Project on community safety from both a health and wellbeing point of view and a traffic and transport point of view.</u></p> <p><u>National Grid has in place construction management arrangements which set out procedures for responding to incidents during the construction phase, including emergency situations, security incidents and protest-related activity. These arrangements are secured through existing pre-commencement documentation, such as the Fire and Emergency Plan and Construction Phase Health and Safety Plan, and include liaison with police and emergency services where required.</u></p> <p><del>Suffolk Constabulary's comments are noted</del><u>The request</u></p>	<p><u>position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary awaits this plan and emphasises that it must address the capacity constraints on police resources and the impact that incident management responsibilities will have on the Constabulary's ability to deliver its core services.</p> <p>Suffolk Constabulary requests that there is a commitment from National Grid to secure 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.</p> <p>Suffolk Constabulary also requires a Security Partnership Working Group to be established to ensure the management of such aspects during the construction</p>	discussion

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		<p><u>for a Security Partnership Working Group (SPWG) during the construction phase will be considered</u>, and National Grid <u>and</u> will <del>continue to</del> engage with Suffolk Constabulary <del>on this matter</del><u>accordingly</u>.</p>	<p>phases, with the relevant local police forces secured as a stakeholder to this.</p>	
6.1.15	Protest Management	<p>Similarly to the approach to the management of Highway incidents described above (ID 5.2.2), it is anticipated that the Main Works Contractor(s) will engage with Suffolk Constabulary in order to establish an agreed procedure for managing protest activities.</p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del><u>The impact on Police resourcing is acknowledged, and National Grid and Main Works Contractor(s) will continue to engage with Suffolk Constabulary and other relevant stakeholders on impact on crime, community safety, cohesion, policing relating to primary and secondary construction site compounds, construction phase incident response/management and community impacts – protest related activity.</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary refers to its response to 5.2.2 above, however it emphasises that any arrangements must acknowledge the strain that protest management activities will place on police resources.</p> <p>This strain is not adequately assessed or acknowledged in the current documents.</p>	Under discussion
<b>Construction Workforce</b>				
6.1.16	Construction Workforce	<p>Based on recent National Grid projects, our working <del>worst-case</del><u>worst-case</u> assumption is that 90% of the workforce will be <del>non-local</del><u>non-local</u> workers.</p> <p>The maximum number of construction workers to be</p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided</u></p>	Under discussion

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		<p>working on the project at any one time is anticipated to be under 2,000 <del>Full-Time</del><u>Full-Time</u> Equivalent (FTE) (i.e., the maximum number of <del>non-local</del><u>non-local</u> workers that may require accommodation will likely be around 1,500 FTE) at the time of writing the SoCG.</p> <p>The locations presently anticipated to require the highest peak construction workforces are Holton St Mary, Suffolk (PAR H12--A2 <del>under the Construction Access Plans within Appendix C of the CTMP [APP-312]</del>) and Little Bromley, Essex (PAR H17--A2) <u>as shown in 7.3 Outline Construction Management Plan – Appendix C – Indicative Highway Mitigation Plans [APP-312, APP-313, APP-314, APP-315, APP-316, APP-317, APP-318, APP-319]</u>. In these cases, up to 400 FTE staff would be anticipated on site concurrently.</p> <p>Full details on the projected number of local and <del>non-local</del><u>non-local</u> workers to be working on the project at any one time, are included within the <del>ES – Chapter 15: Socio-economics, Recreation and Tourism</del><u>ES - Chapter 15: Socio-economics, Recreation and Tourism [APP-265-265]</u>.</p> <p><del>Further details on the potential location of the peak construction workforce can be shared prior to the commencement of construction.</del></p> <p><u>The detailed construction workforce profile of the construction workforce is not available at this</u></p>	<p><u>additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary observes that the Environmental Statement does not adequately assess the policing impacts of introducing a large <del>non-local</del><u>non-local</u> workforce or include an assessment of crime risk. Suffolk Constabulary requests that these impacts be assessed and that appropriate mitigation measures be identified.</p> <p>Without prejudice to the generality of this issue, Suffolk Constabulary requires that the following information is provided:</p> <ul style="list-style-type: none"> <li>• confirmation of the construction workforce profiles;</li> <li>• details of accommodation, including location and clusters;</li> <li>• proposed procedures for communication, reporting and welfare;</li> <li>• construction workforce management measures; and</li> <li>• details of any worked codes of conduct (or similar mechanisms).</li> </ul> <p>The above is required so that Suffolk Constabulary can predict and assess</p>	

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		<p><u>stage. However, it is anticipated that this information may become accessible following the appointment of the construction contractor.</u></p> <p><u>Accommodation:</u></p> <p><u>The project does not propose worker accommodation camps, hostels, or permanent residential facilities.</u></p> <p><u>All construction compounds are designed to provide welfare, offices, logistics and operational support only, not overnight living.</u></p> <p><u>Construction workers will travel daily to and from the site/compounds.</u></p> <p><u>Management Measures:</u></p> <p><u>Construction workforce accommodation will be managed through a distributed network of temporary construction compounds providing welfare and operational facilities only. No on-site residential accommodation or worker camps are proposed. Workforce numbers at each compound are capped and aligned with designed welfare capacity, supported by controlled access, security, and defined staff transport and shuttle bus arrangements. Personnel will be accommodated off-site and will travel daily to site, with movements managed to minimise traffic, noise and amenity impacts.</u></p> <p><u>The workforce profile is phased and temporary, with compounds removed following completion of construction activities.</u></p>	<p>policing demands related to community safety, cohesion and wellbeing.</p>	

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		<p><u>Code of Conduct:</u>  <u>All construction personnel will be required to comply with a site-specific Code of Conduct, which sets clear expectations for professional behaviour at all times. This includes requirements to respect local communities, avoid anti-social or intimidating behaviour, comply with site security and access controls, adhere to agreed working hours and transport arrangements, and refrain from alcohol, drugs, or disorderly conduct while on duty or travelling to and from site. The Code of Conduct will be communicated to all workers through induction and supervision, enforced by site management, and supported by disciplinary procedures where necessary to ensure safe, respectful and responsible conduct throughout the construction period.</u></p> <p><del>Suffolk Constabulary's comments are noted, and</del>            National Grid will continue to engage with Suffolk Constabulary on this matter.</p>		
6.1.17	Construction Workforce Accommodation	<p><u>The location or cluster of the non-local workforce is not available at this stage. There is no dedicated accommodation provision planned for the Project, and non-local construction workforce will find accommodation depending on availability on the market. From previous project experience, National Grid anticipates that the breakdown of accommodation for staff employed during the construction of the Project</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>As above, Suffolk Constabulary observes</p>	Under discussion

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		<p><u>would be: 50% would stay in camping and caravan accommodation; 20% would stay in short-term let properties (such as through the private rented market); 20% would stay in serviced accommodation (such as hotels and B&amp;Bs); and 10% would travel into the area from home. This figure represents the total non-local workforce distribution along the entire linear route of the Project of approximately 180 km, rather than concentrated in a single geographic area.</u></p> <p><del>We are not able to advise where the non-local workers can stay (or will stay at this stage), but an assumption of 50% will be staying at camping and caravan site, 20% in short-term lets, 20% at hotels or B&amp;Bs, and 10% travel into the area from home has been made based on previous National Grid projects.</del></p> <p><del>Further details will be included within the ES – Chapter 15: Socio-economics, Recreation and Tourism [APP-265]</del></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del><u>Any proposed construction compounds will be provided to support day-to-day operations, logistics and staff welfare rather than overnight accommodation. Further details on the security arrangements at any temporary construction compounds will be confirmed as the detailed design is progressed and a security plan is</u></p>	<p>that the policing impacts of the proposed accommodation arrangements have not been adequately assessed. Suffolk Constabulary requests that these impacts be assessed and that appropriate mitigation measures be proposed.</p> <p>Whilst Suffolk Constabulary have requested at 5.2.4 further information on proposed construction workforce accommodation, it also requests confirmation that a CPTED (Crime prevention through environmental design) approach is to be adopted for any temporary sites.</p>	

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6.1.18	Worker Travel & Compounds	<p><u>fully developed by the Main Works Contractor(s). National Grid will continue to engage with Suffolk Constabulary on this matter.</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary notes that peak workforce movements and the location of construction compounds may give rise to parking pressures, workforce dispersal incidents and an increased risk of crime and anti social behaviour (including theft from sites and conflict with local communities).</p> <p>To manage these risks, Suffolk Constabulary seeks the inclusion of:</p> <ul style="list-style-type: none"> <li>• formal liaison arrangements with local Neighbourhood Policing Teams;</li> <li>• staggered shift and dispersal planning to avoid concentrated peaks;</li> <li>• shuttle and travel planning that considers public realm safety;</li> </ul>	Under discussion
		<p><u>The phased and planned nature of construction enables advance coordination of activities, while any concerns raised by local residents or stakeholders will be logged, investigated and addressed by site management, with escalation routes available to senior project management and relevant authorities where required. Workforce behaviour is controlled through Main Works Contractor(s)'s Codes of Conduct and managed transport arrangements.</u></p> <p><u>Construction workforce parking will be managed within designated construction compounds only, which are secured, access-controlled sites providing welfare and logistical facilities. Parking provision is limited and aligned with defined workforce numbers, supported by staff transport and shuttle bus arrangements to reduce reliance on private car use. No on-street or off-site parking in surrounding communities is proposed. Parking demand is temporary, phased in line with construction activity, and managed through compound layout, security controls and transport planning measures.</u></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u>Further details</u></p>		

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		<p><u>on the security arrangements at any temporary construction compounds will be confirmed as the detailed design is progressed and a security plan is fully developed by the Main Works Contractor(s). National Grid will continue to engage with Suffolk Constabulary on this matter.</u></p>	<ul style="list-style-type: none"> <li>• CPTED/'Designing Out Crime' measures at compounds; and</li> <li>• clear incident and crime reporting routes.</li> </ul>	
6.1.19	Designing out Crime	<p><u>Construction compounds will be secured in accordance with the Main Works Contractor(s)'s Security Plan Risk Assessment and will generally include double clipped Heras fencing and Perimeter Intruder Detection (PIDs) to pick up movement. Manned security will be provided if deemed necessary.</u></p> <p><u>For dispersed worksites, such as ground investigation sites, contractor vehicle and person access to each worksite will be controlled by the Main Works Contractor(s) or relevant subcontractor(s) establishing demarcation fencing/barriers around working areas, such as exploratory holes.</u></p> <p><u>Where there are unattended plants, the fenced area will be locked, and cab guards secured. This will generally comprise double clipped Heras fencing, and the use of PIDs may occur overnight if deemed necessary.</u></p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del> <u>Further details on the security arrangements at construction sites will</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves its position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary considers that the Outline CoCP provides insufficient detail on security standards and Designing Out Crime principles. Suffolk Constabulary seeks the inclusion of explicit Secured by Design references, such as minimum standards for security fencing, lighting and CCTV applicable across all construction sites (including dispersed worksites, access points and working corridors, not only main compounds).</p> <p>Suffolk Constabulary also requests the incorporation of a clear contractor Code of Conduct covering behaviour,</p>	Under discussion

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		<p><u>be confirmed as the detailed design is progressed and a security plan is fully developed by the Main Works Contractor(s). National Grid will continue to engage with Suffolk Constabulary on this matter.</u></p>	<p>alcohol/drugs policies, and workforce management expectations. We consider these measures necessary to mitigate crime, protect workers and the public, and reduce policing demand during construction.</p>	
<b>Community Engagement</b>				
6.1.20	Community Engagement	<p>Community Engagement and Public Information measures are set out under <b>Section 3.3</b> of the Outline <del>CTMP</del><del>CTMP</del> <b>[APP-309APP-309]</b>. This sets out information which will be made available to local communities by the Main Works Contractor(s), <u>through the appointment of a site community liaison officer,</u> and the public communications systems which will be established by the National Grid community relations team. It is further anticipated that specific Community Liaison activities will be carried out, as detailed within <b>Section 6.5</b> of the Outline <del>CTMP</del><del>CTMP</del> <b>[APP-309APP-309]</b>.</p> <p>Where complaints are raised by members of the public, these will be addressed by the Main Works Contractor(s) and the National Grid Project team. The proposed approach for this is set out in <b>Section 6.7</b> of the Outline <del>CTMP</del><del>CTMP</del> <b>[APP-309APP-309]</b>.</p> <p><u>National Grid will ensure that a designated point of contact is made available to the public to address any</u></p>	<p><u>Please note that Suffolk Constabulary's position below sets out a response to National Grid's position at Deadline 3 and therefore reserves it position to the extent that the Applicant has provided additional comments beyond those stated at Deadline 3.</u></p> <p>Suffolk Constabulary requests that a clear contact strategy and community liaison route is integrated for all matters relating to the Project.</p> <p>The reality is that police forces will be the first point of contact by the community on many occasions, and therefore to avoid additional burden on police capacity it will be necessary for National Grid to provide free phone telephone numbers as a first point of call for the community. The development of a contact strategy is critical for ensuring</p>	Under discussion

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		<p><u>enquiries or concerns. <b>7.2 Outline Code of Construction Practice [APP-300]</b> includes a proposed mitigation measure, where Commitment Reference GG16 states that the name and contact details for the Project will be displayed at the entrance to all compounds, including an emergency number. Members of the public can also make use of the free project hotline, freepost or email contact details outlined in <b>7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public Information [APP-305]</b> to contact the project team with any queries or complaints.</u> This approach to Community Engagement is considered to be suitable, and appropriate for the present stage of Project development.</p> <p><del>Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.</del></p>	<p>that the impact on the police is minimised as much as possible.</p>	

## 7. Signatures

This Statement of Common Ground is agreed upon by the undersigned parties:

For National Grid

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

For Suffolk Constabulary

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_\_

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<b>Changes:</b>	
<u>Add</u>	273
<del>Delete</del>	157
<del>Move From</del>	0
<u>Move To</u>	0
<u>Table Insert</u>	4
<del>Table Delete</del>	14
<u>Table moves to</u>	0
<del>Table moves from</del>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
<b>Total Changes:</b>	<b>448</b>