

AENC-NG-CNS-REP-0218

Norwich to Tilbury

Volume 8: Examination Documents

**Document: 8.3.2 Signed Statement of Common Ground -
Suffolk Constabulary - Clean Version**

Final Issue E

July 2026

Planning Inspectorate Reference: EN020027

nationalgrid

Revision History

Version	Date	Submitted at
A	26 February 2026	Deadline 1
B	07 April 2026	Deadline 3
C	12 May 2026	Deadline 4
D	10 June 2026	Deadline 5
E	21 July 2026	Deadline 7

Suffolk Constabulary

Statement of Common Ground

1. Purpose of the Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared to confirm to the Examining Authority where agreement has been reached and where agreement has not been reached 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.

This final signed version of the SoCG has been submitted at Examination Deadline 7.

2. Parties to the SoCG

This SoCG has been prepared by 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.

SoCG ID	Summary of matter under discussion	Deadline for resolution
6.1.1 Abnormal Indivisible Load (AIL) Access Approach	Discussions are likely to be concluded during detailed design 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 Suffolk Constabulary governing the operational detail of AIL movements.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed
6.1.2 Abnormal Indivisible Load (AIL) Access Routes		

SoCG ID	Summary of matter under discussion	Deadline for resolution
		between National Grid and Suffolk Constabulary)
6.1.4 Policy and Legislation	Suffolk Constabulary have no major concerns, but reserve their position pending further review during the Examination process.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible
6.1.5 Assessment Methodology	Discussions are likely to be concluded during detailed design regarding the assessment of impact on emergency services, and what additional capacity Suffolk Constabulary may require.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary)
6.1.6 Construction Effects	Discussions are likely to be concluded during detailed design regarding the assessment of impact on emergency services, and what mitigation and monitoring needs to be in place.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary)
6.1.7 Road Safety	Discussions are likely to be concluded during detailed design around road safety potential impacts	Matter is unlikely to be agreed before the end of Examination, however National Grid remains

SoCG ID	Summary of matter under discussion	Deadline for resolution
	and mitigation, and how Suffolk Constabulary and The Applicant can work together.	committed to resolving the matter as soon as possible
6.1.8 Traffic Management Measures	Agreement on traffic management measures is dependent on confirming AIL movement details. The Applicant will continue to liaise with Suffolk Constabulary on this matter.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary)
6.1.10 Construction Access Approach	Agreement on construction access approach is dependent on confirming AIL movement details. The Applicant will continue to liaise with Suffolk Constabulary on this matter.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible
6.1.11 Primary Access Route Selection	Discussions are ongoing regarding contingency routes and AIL movements.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary)
6.1.12 TROs and TTROs	Discussions are likely to be concluded during detailed design regarding enforcement of TROs	Matter is unlikely to be agreed before the end of Examination, however National Grid remains

SoCG ID	Summary of matter under discussion	Deadline for resolution
	and TTROs, agreement is dependent on confirming AIL movement details.	committed to resolving the matter as soon as possible
6.1.13 Communications and Notification	Discussions are likely to be concluded during detailed design regarding communication of AIL movements with the police and how community liaison will be carried out.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible and, insofar as this issue relates to the provision of critical AIL data necessary to inform the provision of future AIL escort services and/or the associated funding agreement, National Grid will use reasonable endeavours to provide this information no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary)
6.1.14 Incident Management	An Incident Management Plan is being prepared, and agreement is dependent this.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible
6.1.15 Protest Management	Engagement is ongoing and will continue between The Applicant, Suffolk Constabulary and the Main Works Contractor(s).	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible
6.1.16, 6.1.18 Construction Workforce	Discussions are likely to be concluded during detailed design; additional details have been provided to Suffolk Constabulary at Deadline 4, and further detail will be provided to Suffolk Constabulary once available from the Main Works Contractor(s).	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible
6.1.19 Designing out Crime	Additional details have been provided by the Applicant to Suffolk Constabulary at Deadline 4; discussions are likely to be concluded during detailed design.	Matter is unlikely to be agreed before the end of Examination, however National Grid remains committed to resolving the matter as soon as possible

4. Background

4.1 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 and one statutory consultation to inform its proposals, with further targeted consultations.

5. 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 process. Table 5.1 provides an overview of the key engagement that has taken place between National Grid and Suffolk Constabulary.

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

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 check-in - 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.

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Date	Format	Topic/Description
February 2026	Meeting	ALL strategy meeting – Suffolk Constabulary & Essex Police.
April 2026	Email Correspondence	Deadline 4 SoCG draft shared with Suffolk Constabulary & Essex Police for comment.
May 2026	Meeting	National Grid held a meeting with Suffolk Constabulary & Essex Police to discuss updated SoCG positions and wording. National Grid also met informally with Suffolk Constabulary & Essex Police immediately prior to ISH2.
June 2026	Meeting	National Grid held a meeting with Suffolk Constabulary & Essex Police, and their respective legal teams to discuss details of the proposed binding contract (or 'side agreement') between the parties.
June 2026	Meeting	National Grid held a meeting with Suffolk Constabulary & Essex Police to discuss updated SoCG positions in the days following Deadline 5.
July 2026	Meeting	National Grid held a meeting with Suffolk Constabulary & Essex Police to discuss positions for the final SoCG to be submitted at Deadline 7.

6. Matters 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
Abnormal Indivisible Load (AIL) Access				
6.1.1	Abnormal Indivisible Load (AIL) Access Approach	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 Section 5 of the Outline CTMP [APP-309], and further detailed within the AIL Access Strategy (Appendix A of the CTMP [APP-310]). A draft version of the AIL Access Strategy was shared with Suffolk Constabulary in March 2025. 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. This approach, therefore, is considered	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. 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 2028 date and Suffolk Constabulary further invites the Applicant to consider whether it is likely that any AIL movements that would require a dedicated police escort team are reasonably likely to be required before this date (such as to deliver on-site infrastructure), in which case the Applicant	Under discussion

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		suitable for AIL access for the Project at the current stage of project development. 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. 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 understanding of likely operational requirements ahead of finalised details. 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	will need to ensure that sufficient stand up time is built in to any such escorts. Suffolk Constabulary has explained to the Applicant that any AIL movements that are required prior to the conclusion of an 18 month stand up period – which will run from the date that a binding funding agreement is in place – would need to be carried out on a BAU basis, subject to operational capacity. 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.	

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		that an appropriate lead-in period of 18 months is available in line with Suffolk Constabulary's requirements. The Applicant's preliminary view, informed by consultation with the Main Works Contractors, is that AIL Police escorts would not be required for the delivery of initial supporting infrastructure but in the unlikely event that they were required, the number of AIL movements would be ad hoc and relatively low. However, in response to feedback from Suffolk Constabulary, the Applicant will provide estimated AIL movements to represent a worst-case scenario and to assist Suffolk Constabulary to forecast resourcing requirements. The Applicant will continue to engage with Suffolk Constabulary on this matter and provide regular updates. 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').	Suffolk Constabulary has engaged with the Applicant's legal representatives, and we are currently in the process of preparing a draft side agreement. Whilst the side agreement will be in place by the close of examination, the agreement itself does not secure the funding. Instead, the agreement will impose the following obligations: (i) a commitment on the part of the Applicant to provide the requisite information to Suffolk Constabulary no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary), acknowledging that Suffolk Constabulary requires a period of 3 months from the date on which that information is provided within which to carry out and complete internal approval procedures necessary to secure the provision of AIL escort services and still be able to ensure an 18-month stand up period following the entering into of the formal funding agreement) and (ii) a commitment to enter into the AIL funding agreement at least 18 months prior to requiring AIL escort	

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		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 movements, National Grid proposes a combination of: Commitments within the Outline Construction Traffic Management Plan (secured by Requirement 4 of 3.1 Draft DCO [APP-056, now superseded by REP2-004]), including provisions for ongoing liaison, forward planning and information sharing; and A binding contract with Suffolk Constabulary, which will govern the operational detail of AIL movements, including notice periods, escort requirements and associated costs. The legal teams representing National Grid and Suffolk Constabulary have met to discuss the details of this 'side agreement' and will continue to engage with each other to secure the above provisions. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road	services from Suffolk Constabulary in accordance with agreed heads of terms. Suffolk Constabulary further notes that it provided the Applicant, on 10 July 2026, with a 'scalable model' to facilitate the agreement of AIL escort requirements. This model has been produced in order to expedite the agreement of an appropriate mitigation package. The models set out the assumptions, resource requirements and indicative costs associated with the provision of dedicated police escort capability for AIL movements connected with the project, including planning, coordination, recruitment, training, operational readiness, deployment, and stand-down arrangements. The costs comprise 18-month stand-up, operational, and 6-month stand-down elements. The stand-up costs reflect the lead-in period required to recruit, train, and equip dedicated teams, whilst the stand-down costs relate to the redeployment of resources at the conclusion of the requirement. Fuel costs remain additional and will depend upon the volume and nature of escort movements required. Suffolk Constabulary awaits further	

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ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project.	comments from the Applicant on the draft scalable model and has requested formal written confirmation of the Applicant's requirements in accordance with the options indicated within the scalable model by no later than 1 October 2026 (or such other date as may be agreed between National Grid and Suffolk Constabulary). Suffolk Constabulary have reviewed the latest Construction Traffic Management Plan, in respect of which Suffolk Constabulary have the following observations: In relation to construction phase incident management and community impacts, Suffolk Constabulary notes the following: • There is no binding obligation in the CTMP regarding incident management; it is simply 'anticipated' that the Main Works Contractor will develop an incident management plan. • Neither the CTMP nor the Code of Construction Practice acknowledge the impact of the police regarding managing community impact.	

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			Suffolk Constabulary welcome the commitment to notify stakeholders of AIL escorts via the Community Liaison Officer; however, this should be supplemented by a requirement to liaise with the Joint Forces where appropriate. Suffolk Constabulary is content for this to be addressed in the side agreement and/or the final AIL funding agreement as necessary. Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group in the Deadline 7 CTMP. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
6.1.2	Abnormal Indivisible Load (AIL) Access Routes	Routes proposed to be utilised by AILs are shown in the AIL Access Strategy (Appendix A of the CTMP [APP-310]). These have been developed following consultations with Suffolk Constabulary. As part of these consultations, draft route information was shared in April 2025. 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. 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.	Suffolk Constabulary reserves its position and notes its reply above.	Under discussion

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
6.1.3	Abnormal Indivisible Load (AIL) Mitigation and Management Measures	The locations of proposed mitigation measures associated with proposed AIL Routes are shown in the 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]. These mitigation measures are considered suitable and sufficient for the delivery of the Project. 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. The management measures relevant to AIL movements discussed within Section 5 of the CTMP, and the AIL Access Strategy (Appendix A of the Outline CTMP [APP-310]) are, in principle, considered suitable for AIL access for the Project at the current stage of project development. 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	Suffolk Constabulary notes its reply above. Subject to the conclusion of the side agreement prior to the close of examination, Suffolk Constabulary is content to accept that the parties have agreed a way forward with respect to AIL mitigation and management measures. Whilst it is again emphasised that the side agreement does not in itself provide the requisite mitigation, it secures an obligation for further information exchange post close of examination as well as a commitment by National Grid to enter into an AIL funding agreement in order to secure the provision of a dedicated AIL escort team.	Agreed

ID	Matter	National Grid's Position	Suffolk Constabulary's Position	Status
		to support Suffolk Constabulary's planning through information exchanges and further engagement on this matter. 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. The Applicant agrees that precise requirements can be confirmed at a later stage through continued engagement with Suffolk Constabulary, and proposes that this matter is moved to Agreed, with the commitment to this further engagement acknowledged.		
Construction Traffic Impacts				
6.1.4	Policy and Legislation	The policy context, legislation and guidance considered when undertaking the Traffic and Transport assessment is presented in Chapter 2 (Key Legislation and Planning Policy Context) [APP-126] and Section 16.2 of Chapter 16 (Traffic and Transport) [APP-271] of the Environmental	Suffolk Constabulary has reviewed the policy context, legislation and guidance identified by National Grid. Suffolk Constabulary are content that the relevant policy context, legislation and guidance have been considered by	Under discussion

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		Statement (ES). All relevant legislation, policy and guidance has been identified and appropriately considered to inform the assessment. 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.	National Grid at this stage. However, Suffolk Constabulary wish to reserve its position on the basis that this view is contingent upon National Grid formally securing with Suffolk Constabulary a bespoke solution for the delivery and funding of police AIL movements. This is because if AILs are required to be delivered on a BAU basis, rather than the via a specialist and dedicated AIL team (being the basis on which any relevant assessments have been undertaken), then this would inherently impact the basis on which any assessments have been carried out.	
6.1.5	Assessment Methodology	Key parameters and assumptions associated with the Traffic and Transport assessment are summarised in Section 16.4 of Chapter 16 (Traffic and Transport) of the ES [APP-271]. The key parameters and assumptions presented are considered appropriate. As part of the project's scoping and assessment work, an assessment of intra-project cumulative effects, undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297], is presented in 6.17 Environmental Statement Chapter	Suffolk Constabulary notes that the impact on emergency service response is not sufficiently scoped into the assessment, including how the scheme will impact the reliability of emergency service responses. This work has not been carried out to date, and the scoping and assessment work is therefore considered to be incomplete. Suffolk Constabulary further notes that the ExA have requested at ExQ2 Gen 2.3 for	Under discussion

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		17 - Cumulative Effects [APP-281], which also assesses inter-project cumulative effects from clusters of other developments. 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. 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.	National Grid to undertake a review of the assessment methodology. Therefore, Suffolk Constabulary retain its position with respect to the assessment of emergency services. 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. As a general point, Suffolk Constabulary envisage mitigation for the likely project 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.	
6.1.6	Construction Effects	The Applicant considers that it has taken a robust, and proportionate approach to assessing the effects during construction, as presented in Section 16.7 (Residual	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	Under discussion

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		Effects) of Chapter 16 (Traffic and Transport) of the ES [APP-271]. 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. 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. 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	on Suffolk Constabulary's operational capacity and resources, notwithstanding ongoing discussions with respect to AIL movements. Whilst ongoing discussions to secure AIL movements via a dedicated and fully funded team will assist with managing operational capacity and resourcing during project construction, this alone does not address all operational/resourcing concerns. 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 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. Suffolk Constabulary considers that it would play a key role in a construction working	

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		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. The Applicant has developed the 7.3 Outline Construction Traffic Management Plan (Revision E) to monitor, mitigate and manage the impacts around construction traffic. National Grid is committed to monitoring and managing the Project's impact on the road network; Section 6 of the Outline CTMP sets out the robust procedures that are anticipated to be undertaken to monitor and manage compliance with the Outline CTMP during construction. This includes detail of the Non-Compliance Procedure in Section 6.3. Instances of non-compliance will be investigated to identify corrective actions where necessary. Section 6 also sets out that the Main Works Contractor(s) will be expected to use a monitoring and reporting system to monitor the number of construction vehicles using the PARs between the sites and the SRN/MRN. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and	group to ensure that mitigation measures are monitored and remain appropriate during the lifetime of the construction phase. Suffolk Constabulary note that National Grid have proposed including obligations relating to policing in the Construction Traffic Management Plan, but the precise requirements are pending further discussion. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP and acknowledges that monitoring and reporting procedures are set out within this document, with a monitoring framework to be development as part of the final CTMP. It is also noted that these are subject to non-compliance measures, which further secures these requirements. Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group in the Deadline 7 CTMP. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this	

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		Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project.	issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this. Moreover, Suffolk Constabulary reserve its position insofar as these mechanisms do not resolve the outstanding impact of the Project on the Police's operational capacity and resourcing (which will largely need to be addressed by way of a side agreement).	
Construction Traffic Management				
6.1.7	Road Safety	An assessment on road safety has been undertaken that thoroughly identifies the potential impact of the Project as set out in Section 4 (Baseline Conditions) of the Transport Assessment (TA) [APP-333] . 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 the national statistics.	As above, any mitigation measures must be contingent upon the completeness and accuracy of the underlying assumptions in the assessment. 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.	Under discussion

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		Areas where potential road safety issues have been identified, as set out within Section 7 (Transport Assessment) of the TA [APP-333], will be highlighted within the Driver's pack as part of mitigation measures secured within the Outline Construction Traffic Management Plan (Outline CTMP) [APP-309]. The driver information pack will be issued to each driver prior to them commencing work, and will be specific to each PAR. The Driver Information Pack will be updated (if required) on a quarterly basis (or sooner, should this be necessary), following the reporting and monitoring cycle, where additional revisions or updates to mitigation are required. The Applicant / Main Works Contractor(s) will consider opportunities to permit Suffolk Constabulary's input into the driver induction process. The assessment methodology used is considered appropriate. Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter.	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. 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: • securing a commitment from National Grid to operate thorough driver induction programmes, which emphasise road safety risks and embed information regarding collision cluster locations; • securing formal route-specific 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 • generally permitting Suffolk Constabulary to input into the driver induction process (including any driver packs and delivering toolbox talks)	

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			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. Suffolk Constabulary note that National Grid's position on this topic remains the same as at Deadline 3. Suffolk Constabulary further note that the ExA has asked National Grid to provide further detail with respect to the Construction Traffic Management Plan and road safety/driver induction and general driver compliance in several ExQ2 questions (TT 2.5 – 2.7). Accordingly, Suffolk Constabulary await further information in order to update its position on this topic. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP and acknowledges the inclusion of a Driver Information Pack. Suffolk Constabulary further welcome the Applicant's commitment to consider opportunities for Suffolk Constabulary to input into the driver induction process. However, Suffolk Constabulary reserve it position on this until the Applicant formally proposes a secured	

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			right of input/consultation on such documents.	
6.1.8	Traffic Management Measures	Details of the proposed traffic management measures are set out in Section 5.8 of the CTMP [APP-309]. These traffic management measures are considered to be appropriate and adequate in terms of their nature and scale to address potential construction impacts. Section 6.2 of 7.3 Outline Construction Traffic Management Plan (Revision E) details the site checks and reporting which will be completed throughout the construction of the Project. The expectation for structural assessments along the AIL routes is that these will be completed by the Main Works Contractor(s) and agreed in principle with the asset owners prior to DCO determination. Post DCO determination, the Main Works Contractor(s) will confirm the final vehicle selection, origin location, and subsequent delivery route via the ESDAL (Electronic Service Delivery for Abnormal Loads) system, which will notify the various stakeholders, police forces and asset owners of the proposals. The use of the ESDAL system is secured within Paragraph 5.2.4 of 7.3 Outline Construction Traffic Management Plan (Revision D). If structural assessments confirm a structure is unable to accommodate the required AIL vehicles, the Main Works Contractor(s) will consider a range of engineering solutions or other measures such	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. 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. Suffolk Constabulary note that such discussions are due to take place and considers it reasonable to expect that an updated position on this issue is anticipated to be reached in due course. Further to this, Suffolk Constabulary requests that a formal emergency services	Under discussion

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		as strengthening of the existing structure, carriageway resurfacing or management of traffic speeds and flows. If there is still a residual issue, alternative AIL delivery routes avoiding those structures would be considered. Suffolk Constabulary's comments are noted, and 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 support Suffolk Constabulary's planning through information exchanges and further engagement.	protocol is secured as part of the construction traffic management plan to include (amongst other matters): • passage arrangement for emergency services; • escalation routes for emergency services; • formal traffic forums / management groups with Suffolk Constabulary in attendance; and • rights of consultation and approval for Suffolk Constabulary to ensure the final Construction Traffic Management Plan is workable. Suffolk Constabulary further note that it is due to engage in discussions with National Grid with respect to the Construction Traffic Management Plan. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP and acknowledges that the Applicant has started to introduce measures to address these concerns. However, Suffolk Constabulary maintains that a formal emergency service protocol has not formally been secured.	

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6.1.9	Traffic Management Implementation and Enforcement	The implementation and enforcement process set out in Section 6 of the Outline CTMP [APP-309] is considered appropriate and adequate for the Project. The data recorded from the non-compliance procedure will be collated on a quarterly basis and will be issued out to the relevant parties, including LHAs, National Highways and Suffolk Constabulary. Suffolk Constabulary's comments are noted, and National Grid will continue to engage with Suffolk Constabulary on this matter. Traffic management will be provided in accordance with Traffic Signs Manual Chapter 8 (Department for Transport and Highways Agency, 2009), proportionate to the type of road, duration of works and volume of traffic. It is intended that any traffic management is to be self-enforcing. The Applicant does not imply that it can exercise Police powers; enforcement of road traffic offences remains a matter for the appropriate enforcement bodies, including the Police. The Applicant also draws attention to Article 49 (Traffic regulation) of 3.1 Draft Development Consent Order (Revision D). Paragraph (4) of Article 49 states that the undertaker must not exercise the powers in paragraphs (1), (2) or (3) of Article 49 unless it has given not less than four weeks' notice in writing of its intention so to do to the	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. 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. In addition to the CTMP being updated to reflect the role of policing, Suffolk Constabulary further requests to be named as a consulted stakeholder in the 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). Furthermore, Suffolk Constabulary understand that National Grid places some reliance on a worker code of conduct. However, it is again critical to emphasise	Agreed

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		chief officer of police and to the traffic authority in whose area the road is situated. Further details on the contractor code of conduct and its enforcement are outlined in 6.1.16 below. As Suffolk Constabulary is listed in Section 6 of the Outline CTMP [APP-309] as a recipient of non-compliance data, The Applicant considers this matter to be agreed.	that any substantial misconduct will ultimately be enforced by the police. Suffolk Constabulary note that National Grid's position on this topic remains the same as at Deadline 3. Suffolk Constabulary look forward to further engagement with National Grid in relation to these matters, which are due to take place in due course. Further to the above, Suffolk Constabulary has undertaken a review of CTMP and notes that the enforcement framework explicitly references the onus on the police to enforce road traffic enforcement offences. Provided that Suffolk Constabulary is formally provided as a recipient of non-compliance data, Suffolk Constabulary is content that this issue is agreed.	
6.1.10	Construction Access Approach	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 Section 5 of the Outline CTMP [APP-309] . The Applicant considers this	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.	Under discussion

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		approach to be suitable and proportionate for construction traffic for the Project. 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. 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. An assessment of cumulative effects undertaken in accordance with 6.19 Scoping Report [APP-288 to APP-296] and 6.20 Scoping Opinion [APP-297] is presented in 6.17 Environmental Statement Chapter 17 - Cumulative Effects [APP-281] which also assesses inter-project cumulative effects from clusters of other development including NSIPs.	Because the AIL strategy remains incomplete at this stage, Suffolk Constabulary remain unable to comment on the suitability of these arrangements. Suffolk Constabulary note that there is key information either missing or unconfirmed and we have not had sight of any update documents or information. 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. 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. Suffolk Constabulary note that the ExA have requested additional information on the cumulative assessment of other NSIPs. Suffolk Constabulary therefore await receipt of this information.	

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			Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary notes that the contingency route approach is referenced within this, with contingency routes subject to the agreement of the police and the highway authorities.	
6.1.11	Primary Access Route Selection	Routes on local roads proposed to be utilised as Primary Access Routes (PARs) are shown in the 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]. https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020027-000190-7.3 Outline Construction Traffic Management Plan Appendix C - Indicative Highway Mitigation Plans - Guide to the Plans and Master Key Plan.pdf. These PARs are considered suitable for use by the proposed construction traffic, considering the proposed mitigation measures detailed within the Outline CTMP [APP-309]. 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	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. Because the AIL strategy remains incomplete at this stage, Suffolk Constabulary remain unable to comment on the suitability of these arrangements. Suffolk Constabulary note that there is key information either missing or unconfirmed and we have not had sight of any update documents or information. 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	Under discussion

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		Transport Assessment – Appendix A – Norwich to Tilbury RSA Strategy [APP-334]. 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. 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. National Grid will continue to engage with Suffolk Constabulary on this matter.	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. Suffolk Constabulary note that the ExA have requested additional information on the cumulative assessment of other NSIPs. Suffolk Constabulary therefore await receipt of this information. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary note that Essex-specific highway information is provided in the document. Suffolk Constabulary continue to reserve its position on the cumulative assessment of other NSIPs as it is not clear how this intersects with the contingency framework.	
6.1.12	Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs)	Proposed Traffic Regulation Orders (TROs) and Temporary Traffic Regulation Orders (TTROs) are shown in the Traffic Regulation Order Plans Sections A to H [APP-025, APP-026, APP-027, APP-028, APP-029, APP-030, APP-031, APP-032]	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,	Under discussion

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		and set out in Schedule 13 to the draft Development Consent Order (DCO) [APP-056]: Part 1 - Temporary Restriction of Waiting and Restriction of Speed. Part 2 - Permanent Restriction of Waiting and Restriction of Speed. Part 3 – Temporary Restriction of Access. Part 4 – Temporary no Overtaking Order. These are considered suitable and sufficient for the delivery of the Project. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project.	which will place additional pressure on police resources. This should be acknowledged and addressed through appropriate resourcing arrangements. 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. Suffolk Constabulary note that National Grid's position on this topic remains the same as at Deadline 3. Suffolk Constabulary look forward to further	

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			engagement with National Grid in relation to these matters, which are due to take place in due course. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary note that a TRO framework has been included. Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group in the Deadline 7 CTMP. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

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Incident Management				
6.1.13	Communications and Notification	The approach to providing communications and notification to Suffolk Constabulary is set out in Section 5.10 of the Outline CTMP [APP-309]. 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. 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. The legal teams representing the Applicant and Suffolk Constabulary have met to discuss the details of this 'side agreement' and will continue to engage with each other to secure the provisions raised by Suffolk Constabulary.	The CTMP does not reference or factor in the 18-month lead-in time required for AIL operations, nor the requirement for training of a dedicated AIL team. 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. 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. 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	Under discussion

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			for ensuring sufficient liaison with police forces. Suffolk Constabulary note that National Grid's position on this topic remains the same as at Deadline 3. Suffolk Constabulary look forward to further engagement with National Grid in relation to these matters, which are due to take place in due course. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary note that commitment to give written notice to the blue light services and to engage on AILs as early as practicable. Subject to the side agreement being entered into prior to the close of examination, Suffolk Constabulary consider that this issue is capable of being resolved.	
6.1.14	Incident Management	Section 5.10 of the developed 7.3 Outline Construction Traffic Management Plan [APP-309] establishes that the Main Works Contractor(s) will develop an Incident Management Plan in consultation with Suffolk Constabulary, alongside other emergency	Suffolk Constabulary welcome National Grid's commitment to develop a plan. However, Suffolk Constabulary note that the referenced plans (Fire and Emergency Plan, Construction Phase Health and	Under discussion

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		service Stakeholders where required. 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. 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. 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. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and	Safety Plan) do not appear to be available for review within the published application documents. Accordingly, Suffolk Constabulary continues to await 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. 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. Suffolk Constabulary further request clarification on how the required plans are secured, whether the Joint Forces will be consulted on their development, and what minimum scope they will include	

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		Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project. The Applicant will also include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Security Partnership Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to security and crime prevention during the construction of the Norwich to Tilbury Project. The Applicant will include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to prepare 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.	(particularly in relation to incident response, protest activity and policing impacts). Suffolk Constabulary also requires 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 stakeholder to this, and this remains outstanding. It is to be noted that this was secured as a DCO requirement in the Lower Thames Crossing DCO. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary note there is no binding obligation in relation to incident management, but rather an acknowledgement that it is anticipated that the main works contractor will enter into such a plan with the blue light services. Suffolk Constabulary accordingly welcome the commitment to address this in the Outline Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its	

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		The Main Works Contractor(s) will consult with the relevant emergency services on the production of the pre commencement IRMP. This consultation will take place through the Security Partnership Working Group (SPWG) , which will include Suffolk Constabulary and other relevant emergency services as key participants.	requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will Similarly to the above, Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group and Security Partnership Working Group in deadline 7 Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	
6.1.15	Protest Management	Similarly to the approach to the management of Highway incidents described above (ID 6.1.14), 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.	Suffolk Constabulary refers to its response to 6.1.14 above, however it emphasises that any arrangements must acknowledge the strain that protest management activities will place on police resources.	Under discussion

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		The Applicant maintains a dedicated security team that collaborates closely with police forces nationwide and will utilise these established relationships to support engagement on matters such as protest management. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project. The Applicant will also include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Security Partnership Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to security and crime prevention during the construction of the Norwich to Tilbury Project.	This strain is not adequately assessed or acknowledged in the current documents. Similarly to the above, Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group and Security Partnership Working Group in the Deadline 7 Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

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		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. This engagement can take place through the established channels (relationship) referred to above and/or a Security Partnership Working Group.		
Construction Workforce				
6.1.16	Construction Workforce	Based on recent National Grid projects, our working worst-case assumption is that 90% of the workforce will be non-local workers. The maximum number of construction workers to be working on the project at any one time is anticipated to be under 2,000 Full-Time Equivalent (FTE) (i.e., the maximum number of non-local workers that may require accommodation will likely be around 1,500 FTE) at the time of writing the SoCG. The locations presently anticipated to require the highest peak construction workforces are Holton St Mary, Suffolk (PAR H12-A2) and Little Bromley, Essex (PAR H17-A2) as shown in 7.3 Outline Construction Management Plan – Appendix C – Indicative	Whilst National Grid has provided additional information, this is not a full assessment of the impact. This information may not be available in full at this time, National Grid should consider how appropriate forums can be put into place (and secured) in order to ensure that impacts on policing as a result of the construction workforce can be identified early and addressed in a collaborative and co-ordinated manner. Accordingly, Suffolk Constabulary observes that the Environmental Statement does not adequately assess the policing impacts of introducing a large non-local workforce	Under discussion

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		Highway Mitigation Plans [APP-312, APP-313, APP-314, APP-315, APP-316, APP-317, APP-318, APP-319]. In these cases, up to 400 FTE staff would be anticipated on site concurrently. Full details on the projected number of local and non-local workers to be working on the project at any one time, are included within the ES - Chapter 15: Socio-economics, Recreation and Tourism [APP-265]. Further details on the potential location of the peak construction workforce can be shared prior to the commencement of construction. The detailed construction workforce profile of the construction workforce is not available at this stage. However, it is anticipated that this information may become accessible as details are developed by the Main Works Contractor(s). Regarding details of accommodation, 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 would be: 50%	or include an assessment of crime risk. Suffolk Constabulary requests that these impacts be assessed and that appropriate mitigation measures be identified. Without prejudice to the generality of this issue, Suffolk Constabulary requires that the following information is provided: • confirmation of the construction workforce profiles; • details of accommodation, including location and clusters; • proposed procedures for communication, reporting and welfare; • construction workforce management measures; and • details of any worked codes of conduct (or similar mechanisms). The above is required so that Suffolk Constabulary can predict and assess policing demands related to community safety, cohesion and wellbeing. Similarly to the above, Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion	

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		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&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. Proposed procedures for workforce management measure, communication, reporting and welfare are not available at this stage; it is anticipated they will be confirmed as the detailed design progresses. 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	Working Group and Security Partnership Working Group in the Deadline 7 Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

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		the construction period. National Grid will continue to engage with Suffolk Constabulary on this matter. The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project. The Applicant will also include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Security Partnership Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to security and crime prevention during the construction of the Norwich to Tilbury Project.		

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6.1.17	Construction Workforce Accommodation	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 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&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. Any proposed construction compounds will be provided to support day-to-day operations, logistics and staff welfare rather than overnight accommodation. The proposed temporary construction compounds will be designed with robust security measures in place; it is envisaged that these will include but not be limited to CCTV, fencing, lighting and on-site security personnel. Where CPTED measures are found to be suitable, these will be considered on a site-by-site basis. Further	National Grid's comment that no worker accommodation is provided is noted. Nonetheless, Suffolk Constabulary request that a CPTED (Crime prevention through environmental design) approach is to be adopted for any temporary sites/ compounds. Suffolk Constabulary consider that these matters should be overseen through the appropriate forums (such as the SPWG) requested to ensure policing impacts are identified early and addressed in a coordinated manner.	Agreed

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		details 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).		
6.1.18	Worker Travel & Compounds	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. 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. Working patterns will be staggered across different staff roles, for example office staff	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). To manage these risks, Suffolk Constabulary seeks the inclusion of: • formal liaison arrangements with local Neighbourhood Policing Teams; • staggered shift and dispersal planning to avoid concentrated peaks; • shuttle and travel planning that considers public realm safety; • CPTED/'Designing Out Crime' measures at compounds; and • clear incident and crime reporting routes.	Under discussion

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		hours differ from delivery or earthworks teams' working times. The proposed temporary construction compounds will be designed with robust security measures in place; it is envisaged that these will include but not be limited to CCTV, fencing, lighting and on-site security personnel. Where CPTED measures are found to be suitable, these will be considered on a site-by-site basis. 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 fully developed by the Main Works Contractor(s). The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project.	Suffolk Constabulary note National Grid's updated position and wish to re-state that its comments set out at 6.1.16 and 6.1.17 above are of relevance to this issue. Further to the above, Suffolk Constabulary has undertaken a review of the CTMP. Suffolk Constabulary note there is no binding obligation in relation to incident management, but rather an acknowledgement that it is anticipated that the main works contractor will enter into such a plan with the blue light services. Suffolk Constabulary accordingly welcome the commitment to address this in the Outline Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

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		The Applicant will also include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Security Partnership Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to security and crime prevention during the construction of the Norwich to Tilbury Project; will allow for continued engagement with local Neighbourhood Policing teams. The Applicant will appoint a community relations team to engage with local residents and stakeholders, including Suffolk Constabulary and other emergency services, and provide dedicated community relations and external communications support. Incident reporting will be carried out in accordance with the Main Works Contractor(s)'s Emergency Response Plan, which will outline various incident scenarios, designated reporting lines and arrangements for contacting external parties, including emergency services. Any non-emergency crime will also be reported to Suffolk Constabulary through the appropriate route. Further details on the Emergency Response Plan will be confirmed as the detailed design is progressed and the plan is fully developed by the Main Works Contractor(s).	Similarly to the above, Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group and Security Partnership Working Group in the Deadline 7 Code of Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	

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6.1.19	Designing out Crime	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. 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. 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. Where CPTED measures are found to be suitable, these will be considered on a site-by-site basis. Further details on the security arrangements at construction sites will be confirmed as the detailed design is progressed and a security plan is fully developed by the Main Works Contractor(s) The Applicant will include at Deadline 7 a commitment in the Outline Construction Traffic Management Plan (Revision F), secured by Requirement 4 of	Whilst National Grid's comments are noted, Suffolk Constabulary continue to request 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). Suffolk Constabulary also requests the incorporation of a clear contractor Code of Conduct covering behaviour, 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. Suffolk Constabulary consider that a commitment to an SPWG would further address these matters. Similarly to the above, Suffolk Constabulary welcome the Applicant's commitment to including a requirement to establish a Transport Community Safety and Cohesion Working Group and Security Partnership Working Group the Deadline 7 Code of	Under discussion

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		Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Transport, Community Safety and Cohesion Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to Abnormal Indivisible Load (AIL) movements, traffic management measures, road closures, diversions, speed management, traffic-related incidents, community safety and community cohesion during the construction of the Norwich to Tilbury Project. The Applicant will also include at Deadline 7 a commitment in the Outline Code of Construction Practice (Revision G), secured by Requirement 4 of Schedule 3 to 3.1 Draft DCO (Revision G), to establish a Security Partnership Working Group to facilitate engagement with Suffolk Constabulary and other relevant emergency services on matters relating to security and crime prevention during the construction of the Norwich to Tilbury Project.	Construction Practice. Whilst Suffolk Constabulary are content that arrangements will be made to resolve this issue, Suffolk Constabulary is not able to provide confirmation that this fulfils its requirements in full without having sight of the proposed wording. Therefore, Suffolk Constabulary will welcome ongoing engagement with the Applicant in relation to this.	
Community Engagement				
6.1.20	Community Engagement	Community Engagement and Public Information measures are set out under Section 3.3 of the Outline CTMP [APP-309] . This sets out information which will be made available to local communities by the Main Works Contractor(s), through the appointment of a site community liaison officer, and the public	Suffolk Constabulary note the community engagement framework set out by National Grid. However, given that police forces are often the first point of contact for communities during construction activity, it is essential that these arrangements are	Agreed

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		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 Section 6.5 of the Outline CTMP [APP-309]. 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 Section 6.7 of the Outline CTMP [APP-309]. National Grid will ensure that a designated point of contact is made available to the public to address any enquiries or concerns. 7.2 Outline Code of Construction Practice [APP-300] 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 7.2 Outline Code of Construction Practice Appendix E – Community Engagement and Public Information [APP-305] to contact the project team with any queries or complaints. This approach to Community Engagement is considered to be suitable, and appropriate for the present stage of Project development.	implemented in a way that actively minimises additional demand on policing resources.	

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7. Signatures

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

For National Grid

DocuSigned by:

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Name: _____

Position: Project Director _____

Date: 17/07/2026 _____

For Suffolk Constabulary

Name: _____

Position: DCC _____

Date: 20. 7. 2026 _____

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