

# Lower Thames Crossing

## Essex Police Initial Response

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Unit: Strategic Planning

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## **A122 Lower Thames Crossing**

### **Section 56 Planning Act 2008**

### **Regulation 8 of the Infrastructure Planning Applications (Prescribed Forms and Procedure)**

### **Regulations 2009**

### **Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017**

## **Introduction**

This document sets out the initial Essex Police response to the Planning Inspectorate's decision to accept an application for Examination for an Order, Granting Development Consent (DCO) for the Lower Thames Crossing.

The representations of Essex Police seek to secure appropriate mitigation and management measures, either via requirements of the DCO or a planning obligation to address the likely impacts arising from the scheme on its joint operations, service capacity and resources, incorporating staff, vehicle fleet and estate assets.

We understand that the project will provide a new road connection between the A2 and M2 in Kent, via an under river crossing and join the M25 close to junction 29 and whilst the need, transport, safety, and user benefits are acknowledged, our review of the scheme indicates that significant impacts are likely to arise for Essex Police, particularly during construction phase of the development, which require appropriate mitigation and management as part of any Development Consent Order.

Comments are also made in relation to the design principles for the operational phase of the Scheme, which warrant consideration in the form of scheme clarification and/ or amendment, and which are summarised under the relevant points below.

As key social infrastructure providers, emergency services and 'interested parties' in this DCO process, Essex Police are engaging with the Applicant (National Highways) with the aim of reaching substantive agreement on the main issues via a Statement of Common Ground with any outstanding matters to be discussed and agreed during the Examination.

## **Considerations**

Our comments in relation to the design, construction and completion phases are outlined below.

### **Design**

1.1. Proposed projects and maintenance schemes, such as housing developments, port expansion and travel infrastructure changes, continue to place significant pressures upon the existing road network. Consideration should be given to future development schemes and infrastructure plans to ensure and develop an efficient policing response in the future.

- 1.2. The scheme should be planned and designed to improve safety and provide best opportunity to lower crime and fatalities, supporting measures to mitigate risk on the road network and to surrounding communities. This will include:
  - 1.2.1. Preventing KSI (those Killed or Seriously Injured) Road Traffic Collisions and suicide where possible in support of the Essex Police and Road Safety Partnership's desire to see zero road death and serious injury casualties by 2040 on Essex Roads.
  - 1.2.2. Preventing the potential risk of a possible attack towards ongoing traffic by objects being thrown from a bridge.
  - 1.2.3. Mitigating the potential for Anti-Social Behaviour (ASB), damage and graffiti.
  - 1.2.4. The design of bridges should reflect its purposed usage and site-specific location. A risk-based needs assessment would encourage the identification of the usage, associated risk with the increased accessibility (i.e., use by pedestrians, cyclists, and equestrians) and allow for mitigating measures to be implemented.
  - 1.2.5. Landscape provision should be carefully considered across the scheme and takes full account of all other opportunities for crime that it may generate.
- 1.3. During the past 18 months the strategic road network within Essex has been subject to significant disruptive protest activity in addition to critical national infrastructure involving protests from a range of environmental groups, anti-government protests, and cost of living protests. This has seen the deployment of large numbers of police resources to manage protest activity. Tactics utilised by protestors have included:
  - Blockading of the carriageway using vehicles.
  - Gluing themselves to road surface.
  - Climbing and securing themselves on top of vehicles.
  - Tunnelling under the carriageway to close or collapse the road.

The Human Rights Act 1998 makes provision for expression which includes protest. There is an obligation on public organisations to protect these rights, but protection of these rights must be balanced against the restriction protest activities may have on the wider community. It is anticipated that the strategic road network will continue to be targeted as part of protest and the following requirements are submitted for consideration:

- 1.3.1. Identification and provision of designated protest areas at suitable points along the works areas. This will enable Police to engage with protestors and propose suitable protest sites where lawful protest can take place, without disrupting works or traffic close to the project location.
- 1.3.2. Funding for an additional protestor removal kit (includes suitable tools for removing protestors utilising all manner of methods to secure themselves).
- 1.3.3. Funding for an additional van for the transport of officers and equipment relating to protestor removal enabling Essex Police to provide a designated transport and resource to protest on the road network impacted by the construction phase.

## Construction

- 2.1. Throughout the life cycle of the scheme, site specific assessments such as risk and security will be pertinent across all components of the design. There is an internationally accepted method of formulating a designing out crime risk and security strategy, based upon the types of incidents that may occur. The common denominators of which comprise of three elements: physical design, social issues and maintenance and care. Research has identified that specific crime types can potentially be 'designed out' and minimised, which consequently will prevent the need for future bespoke situational crime prevention measures. Embedding the concept of 'safety and security' throughout all proposals will ensure the longevity of the scheme, achieve sustainability aims and mitigate the opportunity for crime.
- 2.2. Whilst the introduction of construction workers will help boost the local economy, there are also disbenefits which will impact on existing residents as a result which could include increased night-time economy and an increase in volumes of crime as a victim or involved party. The location, design and security of site compounds must utilise applicable security standards across all components wherever appropriate and ensure effective measures are in place to mitigate the risk of criminal activity such as theft of equipment and/or materials and Anti-Social Behaviour (ASB). Consideration must be given that during the LTC Construction phase, Essex Police will be subject to additional infrastructure projects, such as the A12 upgrade between junction 19 and junction 2, alongside further significant housing and large-scale industrial developments and this will directly impact the operating environment.
- 2.3. Population increase, health and wellbeing information is required to determine the size and nature of the construction workforce, their home origin, health status, and location of any temporary accommodation.
- 2.4. The safety of all road users during the construction and post construction phases are significantly important. Consideration should be given to how vital road traffic restrictions will be managed and enforced during the construction phase on areas such as reduced speed limits or weight limit and prohibition of work(s) traffic.
- 2.5. The construction phase is expected to present significant challenges to Essex Police for responding to calls for service in the locality of the project. Advance insight into road closures; diversions; and the movement of Abnormal Indivisible Loads (AILs) for early mitigation is essential with ease of access to site/s and surrounding housing/industrial estates for blue light services to achieve their respective response times.  
The provision of a base or holding location for emergency services will be required to reduce disruption, this will include the requirement for specialist equipment storage facilities.
- 2.6. Major accidents and disasters, including construction worker specific accidents and injuries needs to be considered including the development of plans and contingencies for facilitating emergency access which in urgent cases may also require safe National Police Air Service (NPAS) helicopter access. Additionally, emergency and resilience planning must be engaged to ensure an appropriate multi-agency plan is in place to respond to incidents. Detail is required relating to the RVP on both sides of the project (Essex and Kent) in order to agree location, design, accessibility, and proposed security specifications of the RVP's. Security considerations must be applied to the design and

layout of core cabling. Access will be required to a building with sufficient infrastructure to run major emergency service operations in line with JESIP<sup>1</sup> principles. Additionally, consultation regarding emergency exit routes within the tunnel is requested.

2.7. Surrounding communities will face significant impact throughout the construction period and Essex police employees will face considerable disruption in their travel to and from the workplace which will additionally impact any large-scale deployment required as a result of policing operations. It is anticipated the community disruption will lead to an increase in calls for service to Essex Police and partner Blue Light Services. To mitigate the impact in receiving misplaced calls we would seek confirmation that National Highways are the central contact and community liaison for matters relating to the scheme and will provide a short direct dial contact for the public and 'patch through' number for emergency services use. A clear contact strategy for this project will be required to ensure that the citizen can obtain the correct service from National Highways, including advice, noise, parking, and any diversion issues. There are specific demands which would require a policing response and there should be clear direction from National Highways, whether this be signposting or the use of social media and partner websites which will reduce the impact to the contact management command within Essex Police.

2.8. The following road safety measures are submitted for consideration:

2.8.1. The requirement for one Traffic Management Officer, employed as Essex Police staff on a fixed term contract over the life of the project to provide dedicated professional and technical support between Essex Police and contractors / National Highways on Traffic Management related issues, including the management of abnormal load notifications. A business proposal has been delivered to National Highways and accepted, in regard to funding a Traffic Management officer, prescribed to the role of liaising between partners on various large schemes across the county. The officer will be responsible for managing communications, operational planning, liaison with residents effected by the project works, as well as working alongside planners at various geographic operational offices. Although the Traffic Manager will initially support the A12 Widening Scheme, the expectation is the role will continue to support this project with the same principles.

2.8.2. Average speed systems to manage vehicle speeds through the online works areas, protecting the work force and road users. This will be covered through the pay per offence processed agreed model.

2.8.3. Consideration to funding additional roads policing patrols covering diversion routes and the surrounding road networks, providing community reassurance, rapid incident management etc. acknowledging that the project will place additional demand upon policing the roads.

2.8.4. Airwave communications within a tunnel location could be affected and the installation of the correct technology should be included within the design and build of the project.

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<sup>1</sup> Joint Emergency Service Interoperability Programme

## Completion

3. It is recognised the completion of the Lower Thames Crossing will bring significant benefits to the road networks currently provided in this area. To maintain road safety measures and ensure benefits are maximised it is suggested that where appropriate, the average speed systems in force during construction should remain as a legacy to the project and to assist the Safer Essex Roads Partnership (SERP) with the aspiration of Vision Zero road deaths and serious injury by 2040.

## Policy

The following national and local planning policy references are considered to be relevant to the Scheme:

### National Policy

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

The National Policy Statement for National Networks acknowledges that National Route Network improvement has the potential to directly affect health, wellbeing, and the quality of life (including through cumulative health impacts) along with indirect health impacts affecting access to key public services and local transport, wherein these should be either avoided, reduced, or compensated, and adequately mitigated (paragraphs 4.79, 4.80, 4.81, 4.82).

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

### Local Policy

Information on local design policy and context in relation to Essex Police is provided below and **Appendix 1** provides key information on Essex policing priorities and context.

### Essex Design Guide

The Essex Design Guide provides high level direction for new developments and infrastructure.

Crime is forever changing and so are the needs and expectations of policing. Consequently, Essex Police advocates to continuously adapt and reflect its practices, to ensure that the service provided is efficient and effective in keeping the residents of Essex safe and highlight the following aspects within this consultation:

- Ensuring that all work, education, and public spaces are sufficiently well designed to promote safe, secure communities and environments.
- To be engaged with master-planning for any transport related developments, collaboratively working with the relevant authorities to ensure that new developments are planned and designed to improve safety on the various networks. This will include preventing KSI (those Killed or Seriously Injured) Road Traffic Collisions where possible.

- To include infrastructure considerations to ensure and develop an efficient policing response in the future. This may include such matters as Vehicle Charging points.
- To encourage effective engagement between Essex Police, Local Authorities and Developers at the earliest opportunity.
- To endeavour to create an ambitious collaboration programme with emergency services and other partners that will enhance our ability to achieve service benefits and stretch our property performance targets for the efficiency of the estate.

### **Traffic Management considerations**

In the interest of road safety and reducing casualties linked to highways usage, we believe that developers should contribute to designing out the need for enforcement within the construction of newly built roads. This would apply to estate roads where the introduction of any desired speed limit is largely self – enforcing through design. This is especially relevant to the strong desire for 20mph limits or zones on new estates. New residents have an expectation that the 20mph limit or zone will be enforced where it then becomes a local policing issue. Creative design can take out the need for enforcement.

For distributor roads we identify more and more roads being built by developers which become roads for distributing high volumes of traffic around new estates and potentially towns. These new roads have the potential to become roads where young drivers will use them as roads to test their ability for travelling at high speeds. For such examples we would look to ensure:

- Speed limits are appropriate and meet the needs of all road users / residents.
- With an evidenced case, and where possible, a developer is instructed to install average speed detections systems to ensure road user compliance, thereby negating / reducing the need for Police presence to enforce speed limits on newly built roads.

Technology exists for red light enforcement at Traffic lights and once again consideration should be given by developers to consider enforcement technology as part of any Traffic light systems installed, improving overall safety of the location but also providing an efficient way to enforce the restriction.

Considering the prevention of crime and to enhance community safety, Essex Police believe that commercial and residential developers should contribute to the costs of installing Automatic Number Plate Recognition (ANPR) systems on newly designed roads.

Developers also need to consider how their planning decisions can have a negative long-term impact upon neighbours and communities around simple things such as parking disputes through the lack of available parking, which can be factored into Designing Out Crime.

In terms of road safety, Developers should make provision for all road users and in particular the most vulnerable road users, cyclists and pedestrians.

## **Conclusion**

As key social infrastructure providers, emergency services and interested parties in this DCO process, Essex Police has identified the Lower Thames Crossing Project as having significant impact on its operations, service capacity and resources requiring appropriate mitigation and management measures, either as part of the Requirements of the DCO or via planning obligations.

Essex Police are therefore engaging with National Highways with the aim of reaching substantive agreement on the main issues via a Statement of Common Ground, with any outstanding matters to be discussed and agreed during the Examination.

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

## **Appendix 1**

Information on Essex policing priorities and context.

### **PFCC Police and Crime plan 2021 - 2024**

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

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

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

The twelve plan priorities:

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



## **Essex Police Force Plan**

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

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

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