

# **Application by National Highways for an Order granting Development Consent for the Lower Thames Crossing (Ref. No. TR010032)**

## **Submission for Procedural Deadline C – 13 June 2023 Emergency Services & Safety Partners Steering Group (ESSPSG)**

### **Introduction**

1. The Emergency Services and Safety Partners Steering Group (ESSP SG) has submitted Relevant Representations to the Examining Authority (ExA). In those Relevant Representations, the ESSP SG outlined its concerns regarding the Lower Thames Crossing Development Consent submissions made by the Applicant (National Highways). Those Relevant Representations were set against the 56 Recommendations which the ESSP SG had submitted to the Applicant in September 2021 as part of the Applicant's Community Impacts Consultation. The Recommendations focussed on eleven areas of concern as follows:
  - General Points
  - Protest
  - Security
  - Emergency Access
  - Rendez Vous Points (RVPs)
  - Emergency Hubs
  - Emergency Service Response Times
  - Displacement from a tunnel incident / emergency
  - Fire Suppression and Management of Incidents Within the Tunnels
  - Suicide prevention, mental health and wellbeing
  - Future threats
2. In addition - and cutting across these areas of concern, the Steering Group consider that there will be impacts due to the construction and operation of the LTC project on the ability of the emergency services to deliver their functions; and that those impacts should be mitigated. Therefore, modelling is being carried out to support this case.
3. The Recommendations of September 2021 (and hence also the ESSP SG's Relevant Representations) cover a wide range of matters. The ESSP SG has been working with National Highways to progress a Statement of Common Ground for the whole of the group covering this range of matters, and a draft of this will be submitted by Examination Deadline ED1.

## **Purpose of this Submission**

4. At the Preliminary Meeting Part 1 (PM pt1) which took place on 6 June 2023, the ESSPSG made brief oral representations to the Examining Authority (ExA) in relation to Agenda Item 4 Initial Assessment of Principal Issues (which formed Annex B to the Rule 6 letter). In essence, the ESSP SG sought clarity regarding which of the Principal Issues would address its full range of matters and concerns. Some of those concerns relate to Recommendations made by the ESSP SG to include matters in the preliminary scheme design and control documents. Other concerns of the ESSP SG relate more to Recommendations regarding the securing of further details, operational plans, mitigation and contributions - including how and when the Applicant (and its contractors) will be required to consult meaningfully with the ESSP SG - in the event that DCO is granted.
5. At the Preliminary Meeting Part 1 (PM pt1) the ExA indicated that it would welcome a submission from the ESSP SG at Procedural Deadline C 13 June 2023 indicating which of its Recommendation topics might already be covered by the Initial Assessment of Principal Issues; and which are not. This would provide the ExA with the opportunity to consider these points when revising the list of Principal Issues, and at what hearing sessions these concerns might be discussed.
6. This submission provides that information. The ESSP SG recognises that the list of Principal Issues is something which may evolve during the course of the examination. The ESSP SG can also confirm that it will continue working with the Applicant to reach as much agreement on each Recommendation as possible, mainly through the group Statement of Common Ground. Where further agreement is reached on a matter of concern, this may remove the need to address this, and so it can be removed from the list of Principal Issues in due course.
7. In addition, at PM pt1, the meeting touched on the production of both a group Statement of Common Ground between the Applicant and the ESSP SG; and between the Applicant and individual Police forces. Comment on this issue is provided at the end of this submission.

## **Principal Issues**

8. In Appendix A to this submission, the ESSP SG sets out comments on the Initial Assessment of Principal Issues against each of its Recommendations from September 2021 (which form the basis for the Group's concerns). Many of the Group's concerns do not appear to be covered by a Principal Issue.
9. Given the complexity and range of issues identified in Appendix A, the ESSP SG suggests that the ExA considers identifying a further Principal Issue to cover any matters which are not currently identified as falling under one of the Preliminary List. This could perhaps be titled "ESSP SG issues" or similar.
10. Further explanation and analysis is set out below.

## a) Issues which appear to cover ESSPSG concerns

11. **Issue 4 is: *Traffic and transportation***. The third bullet of Issue 4 could potentially cover the ESSP SG's concerns in relation to the second part of Recommendation 5.7 – i.e. defaulting to hard shoulder provision if emergency response and management plans do not adequately address prompt attendance at incidents. The ESSPSG would welcome clarification from the ExA on this point.
12. The seventh bullet under **Issue 13 *Social, economic and land-use considerations*** is "***Health effects***". It is possible that this could cover the ESSP SG concerns in Recommendations 11.1 – 11.4 dealing with concerns regarding suicide, mental health and well-being during both the construction and operational phases of the Project. If this is the case, the ESSPSG would welcome clarification from the ExA on this point.

## b) Issue 14

13. **Issue 14 is: *The draft Development Consent Order (dDCO), planning obligations, agreements, and the adequacy of security for project delivery and mitigation***. This issue could potentially address (or partially address) some of the ESSP SG Recommendations. For instance, Recommendation 2.1 requests guarantees that adequate consultation with the Emergency Services on a range of matters will be provided and acted on – including making the Emergency Services statutory consultees in the DCO. This appears to fall under this general heading, as it seeks guarantees regarding consultation with and meaningful input from the ESSP SG members when further details come forward.
14. However, it appears to the ESSP SG that Issue 14 is not intended to provide a forum to discuss and seek changes to the submitted documents other than just the DCO, planning obligations and other agreements. For instance, ESSP SG Recommendation 10.1 seeks a change to the Code of Construction Plan to include a minimum contents list for the Emergency Response Plans for the tunnels. If the Group does not reach agreement with the Applicant beforehand, we would seek an opportunity to make the case to the ExA for such a change to the CoCP.
15. Similarly, ESSP SG Recommendation 2.4 seeks the preparation and submission (prior to grant of DCO) of an overall strategy or framework for providing and implementing emergency response plans for all phases of the project. It is not clear to the ESSP SG under which issue the need for such a strategy will be discussed.
16. The ESSP SG requests clarification from the ExA on whether Issue 14 will also cover other securing mechanisms, such as the Code of Construction Practice, Register of Environmental Actions and Commitments, Design Principles and approved plans to secure appropriate consultation and reporting as part of further design and other work seeking approvals after any DCO may have been granted.

### **c) Changes to the scheme**

17. In addition, there are some recommendations of the ESSP SG which seek the provision of features of the LTC Project to be included in the Preliminary design. These include Recommendation 5.10 requesting the provision of designated helicopter landing areas close to the south and north tunnel portals in the preliminary design, with these shown on the control drawings and referenced in the DCO Works in schedule 1. The ESSP SG are keen to ensure that the need for such features is discussed if necessary, in addition to how they might be secured for delivery, should DCO be granted. It does not appear to the ESSP SG that Issue 14 will address this concern. Clarification from the ExA on this point would be welcomed by the ESSP SG.

### **Proposals for Principal Issues**

18. The ESSP SG does anticipate that some matter of concern for the group may be resolved through discussions with the Applicant, and so not all of its Recommendations will, in the event, require discussion as part of a Principle Issue. The potential for this will become clearer once the draft group SoCG is published in the near future.
19. However, as mentioned at paragraph 9 of this submission, given the complexity and range of issues identified in Appendix A - the ESSP SG suggests that at this stage the ExA might consider identifying a further Principal Issue to cover any matters of concern to the ESSPSG which are not currently identified as falling under one of the Preliminary List. This could perhaps be titled "ESSP SG issues" or similar.

### **Statements of Common Ground**

20. As requested by the ExA, the ESSP SG is progressing with the group Statement of Common Ground with the Applicant; and individual member Police forces are also progressing with separate Statements of Common Ground with the Applicant.
21. Nevertheless, the ESSP SG is concerned at the overlap between the group and individual Statements of Common Ground; and considers that this presents a real risk of leading to confusion. Given that two of the central purposes of the Statements of Common Ground are to provide the ExA with greater certainty and simplification of the most important issues, the ESSP SG considers that this risk is unhelpful.
22. Therefore the ESSP SG suggests that the ExA considers writing to the Applicant to require that the individual Statements of Common Ground with the Police forces only deal with issues which have a specific spatial element and are local to those forces, rather than issues which run across the whole Project length.

**Emergency Services and Safety Partners Steering Group  
for the Lower Thames Crossing  
13<sup>th</sup> June 2023**

## APPENDIX A

ESSP SG Recommendations September 2021	Where addressed in the Initial Assessment of Principal Issues (Rule 6 Letter, Annex B)
<p>Area of Concern: General Points</p>	
<p><b><u>Recommendation 2.1</u></b></p> <p><i>The Order should set out clearly the procedures and processes for approval of the detailed design, including those for consultation, so that there is no doubt about how it will be carried out. Specifically, it is recommended that the draft DCO is amended as follows:</i></p> <ol style="list-style-type: none"> <li><i>1. a clear definition of the Emergency Services is provided in the DCO, to encompass all Police, Fire and Rescue, and Ambulance services through which the LTC will pass</i></li> <li><i>2. the Emergency Services are named consultees on the preparation of and submission for approval of:</i> <ol style="list-style-type: none"> <li><i>a) the detailed design</i></li> <li><i>b) the Environmental Management Plan (EMP, Second Iteration)</i></li> <li><i>c) the EMP Third Iteration</i></li> <li><i>d) the Landscaping Scheme</i></li> <li><i>e) traffic management plans for each part of the construction phase</i></li> <li><i>f) means of enclosure in accordance with Volume 1, Series 0300 of the Manual of Contract Documents for Highway Works</i></li> <li><i>g) the traffic impact monitoring scheme</i></li> </ol> </li> <li><i>3. the undertaker is required to take into account and report on the views of the Emergency Services prior to submission of details for approval by the Secretary of State</i></li> <li><i>4. the Emergency Services are given 8 weeks in which to provide their views when consulted by the undertaker.</i></li> </ol>	<p style="text-align: center;">Can be dealt with under Principal Issue 14</p>

ESSP SG Recommendations September 2021	Where addressed in the Initial Assessment of Principal Issues (Rule 6 Letter, Annex B)
<p><b><u>Recommendation 2.2</u></b></p> <p><i>Funding should be provided for:</i></p> <ul style="list-style-type: none"> <li>a) <i>a co-ordination officer post to support the ESSP Steering Group members in responding to emergency services consultations on the detailed design and construction phase document approval stages;</i></li> <li>b) <i>funding for ESSP Steering Group member officer time to carry out detailed reviews of the documentation coming forward</i></li> </ul>	<p>Securing these mitigations can be dealt with under Principal Issue 14, possibly through use of a side agreement.</p> <p>Not clear under which Principal issue the need for these mitigations will be discussed</p>
<p><b><u>Recommendation 2.3</u></b></p> <p><i>A document should be produced providing a comprehensive assessment of the effects of the LTC on the activities of the emergency services and safety partners, with identified mitigation measures, and commitments in the proposals and control documents.</i></p>	<p>Not clear under which Principal issue the need for this document will be discussed.</p> <p>(see also Recommendation 8.1)</p>
<p><b><u>Recommendation 2.4</u></b></p> <p><i>The DCO and scheme documents should provide a strategy or framework for providing and implementing Emergency Incident Management/Response Plans for the different stages and elements of the LTC –during both the construction (including enabling works) and operational phases.</i></p>	<p>Not clear under which Principal issue the need for this strategy / framework will be discussed.</p> <p>Securing a strategy/framework might be dealt with under Principal Issue 14 if that covers mechanisms such as the CoCP/REAC or SACR.</p>
<p><b><u>Recommendation 2.5</u></b></p> <p><i>The ESSP Steering Group and LTC should work together towards a Statement of Common Ground covering the issues and recommendations set out in this response.</i></p>	<p>Underway, no separate Issue required</p>

ESSP SG Recommendations September 2021	Where addressed in the Initial Assessment of Principal Issues (Rule 6 Letter, Annex B)
<p><b><u>Recommendation 2.6</u></b></p> <p><i>The project team should consider preparing a confidential Intelligence Plan and Requirements document to include, for instance, details of ANPR systems to be installed along the route.</i></p>	<p>May need discussion under Issue 14 if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b>Area of Concern: Protest</b></p>	
<p><b><u>Recommendation 3.1</u></b></p> <p><i>The ESSP Steering Group recommends that LTC liaises (or continues to liaise) with community and protest groups in advance of construction of the project. This should include discussing with those groups the potential value of identifying protest areas which might meet their needs in a safe way.</i></p>	<p>Securing mitigations arising from such discussions can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 3.2</u></b></p> <p><i>Preparation of a Protest Plan (or a protest section within an incident response or management plan) should be considered.</i></p>	<p>Engagement of Emergency Services in approval and securing a Protest Plan can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>



ESSP SG Recommendations September 2021	Where addressed in the Initial Assessment of Principal Issues (Rule 6 Letter, Annex B)
	Alternatively, this could be dealt with under a new ESSP SG Principal Issue
<p><b><u>Recommendation 3.3</u></b></p> <p><i>The ESSP Steering Group recommends that a general protest area is identified on the approved plans, within the Order Limits.</i></p>	Further discussion not needed at this stage
<p><b>Area of Concern: Security</b></p>	
<p><b><u>Recommendation 4.1</u></b></p> <p><i>It is recommended that the future work of the Security Working Group is scoped and clarified, so that it is fully effective in influencing the scheme design and construction. This can take place outside the scope of the DCO and control documents.</i></p>	This may form part of further submissions in relation to Recommendations 4.2 – 4.4 below, but does not need to be discussed separately
<p><b><u>Recommendation 4.2</u></b></p> <p><i>The Construction Code of Practice should be amended to set out a strategy for dealing with security issues, with an overall procedure for all contractors to follow, and including reference to established standards, to ensure consistency across all sites.</i></p>	<p>Not clear under which Principal issue the need for these mitigations will be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14.</p>
<p><b><u>Recommendation 4.3 - September 2021 Consultation Response</u></b></p> <p><i>Security issues should be included within the work of the Joint Operations Forum referred to in section 4.3 of the Construction Code of Practice, with a requirement to include security in detailed contractor proposals</i></p>	<p>It is not clear under which Principal issue security issues and the need for changes to the CoCP will be discussed.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC</p>

ESSP SG Recommendations September 2021	Where addressed in the Initial Assessment of Principal Issues (Rule 6 Letter, Annex B)
	or SACR to ensure consultation/engagement and security of mitigation delivery.
<p><b><u>Recommendation 4.4 - September 2021 Consultation Response</u></b></p> <p><i>The security issues identified in Appendix B to this response should be addressed in detailed proposals for both the construction phase (including enabling works) and the detailed design of the LTC. This should be referenced in the Design Principles.</i></p>	<p>It is not clear under which Principal issue security issues and the need for changes to the CoCP will be discussed.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC and Design Principles to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 4.5</u></b></p> <p><i>The ESSP Steering Group recommends that the measures and requirements set out in [the submissions from September 2021] are identified in approved plans and/or control documents.</i></p>	<p>Securing these mitigations can be dealt with under Principal Issue 14.</p>
<p><b><u>Recommendation 4.6</u></b></p> <p><i>Clarification should be provided that the design has and will consider the risk of modern slavery, human trafficking and other hidden vulnerability and harm exploiting the new route, and in the location and detailed design of the worker accommodation proposals.</i></p>	<p>Not clear under which Principal issues of modern slavery will be discussed. The Steering Group suggests that this could be dealt with as a confidential matter in closed statements and hearings.</p>

<b>Area of Concern Emergency Access</b>	
<p><b><u>Recommendation 5.1</u></b></p> <p><i>The procedures and requirements for the development of Contractor emergency plans should be formalised in the DCO, to include an explicit requirement for approval, and a commitment to consultation with relevant emergency services and safety partners. This could be combined with provisions in the Construction Code of Practice and the Construction Traffic Management Plan.</i></p>	<p>It is not clear under which Principal issue contractor emergency plans will be discussed – this could be covered under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 5.2</u></b></p> <p><i>Provision should be made for helicopter landing during the construction phase at locations in addition to the hyperbaric facilities at the northern tunnel portal. Identification of helicopter landing facilities should be made a requirement prior to commencement of the development, and their location should be confirmed in approved plans.</i></p>	<p>Not clear under which Principal issue provision of helicopter landing areas during construction will be discussed. This could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these can be dealt with under Principal Issue 14, , if that covers mechanisms such as the CoCP/REAC or and Design Principles or approved plans to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 5.3</u></b></p> <p><i>Emergency access arrangements should be included within the emergency preparedness procedures to be developed in consultation with the emergency services and safety partners, as outlined in the CoCP.</i></p> <p><i>This should include ensuring that any internal haul roads which might be used by the emergency services are fit for that purpose.</i></p>	<p>Not clear under which Principal issue emergency access arrangements will be discussed. This could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC</p>

	or SACR to ensure consultation/engagement and security of mitigation delivery.
<p><b><u>Recommendation 5.4</u></b></p> <p><i>Emergency preparedness procedures should include ensuring that communications provisions are compatible with those used across all of the emergency services and other responding organisations, not just Fire and Rescue (bearing in mind the planned change from Airwave to a new Emergency Services Network), and the continued requirement for ability to use the mobile phone network.</i></p>	<p>Securing these mitigations can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 5.5</u></b></p> <p><i>All of the emergency access road provisions in the scheme should be consistently referred to in the DCO, and labelled as such on the relevant Works, Integrated Care Partnerships General Arrangements, Tunnel Area and other approved plans and drawings.</i></p>	<p>This can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 5.6</u></b></p> <p><i>The arrangements for emergency services to enter the emergency access roads should be designed in accordance with the advice provided in Appendix B to this response. This should form part of an approved Emergency Response / Management Plan for the road.</i></p>	<p>Securing these mitigations can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns..</p>
<p><b><u>Recommendation 5.7</u></b></p> <p><i>Emergency Response / Management Plans for the LTC should be required to address how prompt access to incidents is to be achieved, especially if traffic backs up, and given the absence of a hard shoulder. In the absence of these plans to deliver emergency service access to incidents, the ESSP Steering Group's default position is that a hard shoulder should be provided.</i></p>	<p>Securing this content in Emergency Response / Management Plans can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery. .</p>

	<p>Issue 4, bullet 3 may facilitate discussion on second part of this recommendation.</p>
<p><b><u>Recommendation 5.8</u></b></p> <p><i>The width of the tunnel emergency access roadways should be assessed in terms of their adequacy to accommodate emergency vehicles (including a review of appliance turning circles), allow sufficient facility for vehicles to pass, and to avoid conflict with members of the public evacuating the tunnel.</i></p>	<p>Securing adequate emergency access roadway widths can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR or approved plans to ensure consultation/engagement and security of mitigation delivery</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns..</p>
<p><b><u>Recommendation 5.9</u></b></p> <p><i>As removeable barriers are an important element of emergency response around the tunnel:</i></p> <p>a) <i>they should be clearly identified as such in the DCO Works in Schedule 1</i></p> <p>b) <i>justification should be provided for their positioning and number, related to plans for responding to incidents, with consideration being given to the provision of additional removeable barriers.</i></p>	<p>b) Not clear under which Principal issue provision of (and justification for) removeable barriers will be discussed – but could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>a) Securing these can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 5.10</u></b></p> <p><i>Clear provision should be made in the preliminary design for designated emergency helicopter landing areas close to the north and south portals. These could be shown on the control drawings, and referenced in the list of authorised Works in the DCO.</i></p>	<p>Not clear under which Principal issue the need for provision of helicopter landing areas at the tunnel portals will be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing these can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR or approved plans to ensure consultation/engagement and security of mitigation delivery</p>

**Area of Concern: Rendez Vous Points (RVPs)**

**Recommendation 6.1**

*The preliminary design should be amended to reflect the acknowledged need for Emergency Services Rendez Vous Points (RVP), both in the general vicinity of the tunnel portals, and elsewhere along the route. RVP should be included in the list of authorised Works in Schedule 1 of the DCO, and indicated on the approved Works Plans.*

**Recommendation 6.3**

*Consideration should be given to the location of RVPs at an early stage, so that the following can be taken into account in the preliminary proposals:*

- a) *road links*
- b) *availability of land*
- c) *integration with emergency access routes and Emergency Hubs.*
- d) *RVP should be identified in more detail on the General Arrangement Drawings if appropriate.*

**Recommendation 6.4**

*The preliminary scheme design should be reviewed to consider whether there are other locations on the proposed route, away from the tunnel portal areas, where RVP could be provided, and to include these in the development of Emergency Response Plans.*

**Not clear under which Principal issue any changes to the proposals for RVPs would be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.**

**Securing RVPs can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.**

<b>Area of Concern : Emergency Hubs</b>	
<u><b>Recommendation 7.1</b></u>  <i>The preliminary design should be amended to provide Emergency Hubs at the tunnel portals, with consequent changes to the list of authorised Works in Schedule 1 (and corresponding Works Plans), the General Arrangement drawings if appropriate. The Emergency Hubs should be integrated with the provision of Rendez Vous Points and Forward Control Points, as discussed in the previous section of this response. Details of the Emergency Hubs should be the subject of consultation with the Emergency Services prior to submission to the Secretary of State for their approval.</i>	<p>Securing Emergency Hubs can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.,</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<u><b>Recommendation 7.2</b></u>  <i>What is intended by the new emergency area noted in Work No. 5A (ix) in Schedule 1 of the draft DCO (Works plans 13 and 17) should be clarified in the DCO documents, shown on the General Arrangement drawings and approved plans, and referred to in the description of the development (for instance in Chapter 2 of the Environmental Statement).</i>	<p>Clarity on this point has been provided, and securing the provision of Emergency Areas of RVPs can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR or approved plans to ensure consultation/engagement and security of mitigation delivery.</p>
<b>Area of Concern : Emergency Service Response Times</b>	
<u><b>Recommendation 8.1</b></u>  <i>A review should be undertaken of the impacts of the LTC on emergency services.</i>	<p>Not clear under which Principal issue the need for this document will be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>(see also Recommendation 2.3)</p>
<u><b>Recommendation 8.2</b></u>  <i>Further modelling and assessment of the impacts of the LTC on emergency service response times and targets should be undertaken.</i>	<p>It is suggested that this might be dealt with under Principal Issue 4. It is not clear under which Principal issue the potential impacts of the Project (construction and operation)</p>

<p><b>Recommendation 8.3</b>  <i>Following the further assessment of response times, mitigation measures should be proposed where necessary to ensure that emergency service responses do not deteriorate as a result of the project. Mitigation may include:</i></p> <p>a) <i>funding additional emergency service staffing and vehicles over the construction phase</i>  b) <i>requirements on contractors to commission private emergency service support such as ambulance cover with appropriate levels of staffing, training, hours of cover and working practices to be agreed and reviewed with the ESSP Steering Group on an annual basis.</i></p>	<p>on the ability of the Emergency Services to respond to incidents would be discussed, including the potential need for mitigation.</p> <p>Securing any mitigations required as an output of the modelling can be dealt with under Principal Issue 14 –, if it has not already been dealt with through other securing mechanisms, such as the CoCP/REAC or SACR and on approved plans, under Issue 4.</p>
<p><b>Recommendation 8.4</b></p> <p><i>The Emergency Services should be formally consulted on the production and approval of the Traffic Management Plans as a requirement of the DCO.</i></p>	<p>Securing this can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b>Recommendation 8.5</b></p> <p><i>The proposals and (if necessary the draft DCO) should make the setting up of the Traffic Management Forum a clear commitment of the project.</i></p>	<p>Securing this mitigation can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b>Recommendation 8.6</b></p> <p><i>Funding should be provided for the creation of a Police Traffic Management Officer, as described in paragraphs 8.23 – 8.25 and Appendix E of this response, to cover the construction phase and the first five years of operation of the LTC.</i></p>	<p>It is not clear under which Principal issue the need for additional Police Traffic Management Officer resources would be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>



	<p style="text-align: center;"><b>Securing the funding sought can be dealt with under Principal Issue 14 possibly by use of a separate legal side Agreement.</b></p>
<p><b>Area of Concern : Displacement from a tunnel incident / emergency</b></p>	
<p><b><u>Recommendation 9.1</u></b></p> <p><i>The DCO list of authorised Works in Schedule 1 should include reference to the provision of tunnel evacuation assembly areas, and these should be indicated on the Works plans, shown on the General Arrangement drawings if appropriate, with further detail required be reference to the Design Principles. The proposals should include details of safe routes from the tunnel to the evacuation assembly areas. Such plans referenced in this recommendation should be approved plans.</i></p>	<p>It is not clear under which Principal issue the need for tunnel evacuation areas and safe access routes would be discussed.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14.</p>
<p><b><u>Recommendation 9.2</u></b></p> <p><i>Any Emergency Response/ Incident Management Plan prepared for the tunnel must include an evacuation section, and extend to show how the scheme will provide for the welfare of members of the public during both short term and longer term incidents; how road users will be reunited with their vehicles where possible; and the means of transport away from the tunnels where necessary. Any Emergency Response/Incident Management Plan should be a control document.</i></p>	<p>It is not clear under which Principal issue the need for and content of a tunnel evacuation section in the Emergency Response Plans would be discussed. . It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing such a plan can be dealt with under Principal Issue 14 (there are other securing mechanisms, such as the CoCP/REAC or SACR and on approved plans, which are better in this case).</p>
<p><b><u>Recommendation 9.3</u></b></p> <p><i>Response plans and contractual arrangements with the scheme operators should include provisions to reimburse local authorities and emergency services in for their costs in dealing with major incidents in appropriate circumstances.</i></p>	<p>It is not clear under which Principal issue the need for provisions for reimbursing local authorities and emergency services would be discussed.</p> <p>Securing such reimbursement can be dealt with under Principal Issue 14, if that covers mechanisms such as the</p>

	CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.
Area of Concern : Fire Suppression and Management of Incidents Within the Tunnels	
<p><b><u>Recommendation 10.1</u></b></p> <p><i>The Construction Code of Practice should make a clear commitment for contractors to produce emergency response plans for dealing with fire incidents in the tunnel, in consultation with the emergency services. These should include any particular requirements related to access from the public highway via internal haul roads, and address the risks to both the workforce and emergency service personnel. The CoCP should also set out the minimum contents required to be included in the Emergency Response Plans as described at paragraph Error! Reference source not found. above.</i></p>	<p>It is not clear under which Principal issue emergency response plans for fire incidents in the tunnel will be discussed, including the provision of minimum contents for such plans.</p> <p>Securing these mitigations can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 10.2</u></b></p> <p><i>The draft DCO, the Works plans, General Arrangement drawings, Tunnel Area plans and the Tunnel Limits of Deviation should be amended to be clear on the location, number and spacing of tunnel cross-passages which are sought under the Order. If flexibility is required, the cross-passages could be shown on the drawings and expressed in the other documents as subject to confirmation within stated parameters, including the range of separation distances. The ESSP Steering Group considers that these parameters should be expressed in a way which is consistent with paragraph 3.26.1 of CD 352, i.e. 100m, up to a maximum of 150m subject to a quantitative risk analysis.</i></p>	<p>It is not clear under which Principal issue matters relating to tunnel cross-passages will be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 10.4</u></b></p> <p><i>If flexibility is sought through the Order, the cross-passage design and spacing in detailed design must be subject to thorough consultation prior to approval by the Secretary of State, with the Emergency Services named as statutory consultees. This would be along the lines referred to in the recommendations made in the General Points section of this Response.</i></p>	<p>Securing necessary parameters for cross passages can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>

<p><b><u>Recommendation 10.3</u></b></p> <p><i>LTC should consider revising the Operational Risk Assessment to address a scenario where both tunnel bores are closed at the same time.</i></p>	<p>It is not clear under which Principal issue the issue of dual bore closure will be discussed. It is suggested this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p> <p>Securing any necessary mitigation arising from this matter can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>
<p><b><u>Recommendation 10.5</u></b></p> <p><i>Given the potential advantages it offers, the ESSP Steering Group consider that a Fixed Fire Fighting System should be an unequivocal commitment in the preliminary design, DCO and control documents, to be approved in detail. This is especially important if cross-passage spacing may be increased from the benchmark 100m stated in CD 352.</i></p>	<p>Provisions to secure a FFFS can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 10.6</u></b></p> <p><i>The British Automatic Fire Sprinkler Association should be consulted at an early stage in the detailed design of the tunnel and the FFFS.</i></p>	<p>Provisions to secure such consultation can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>

<p><b><u>Recommendation 10.7</u></b></p> <p><i>The detailed tunnel design should be subject to thorough consultation with the Emergency Services from the outset, and not just prior to submission to the Secretary of State for approval. LTC should consider whether details of the tunnel safety design should be specifically and separately identified in the DCO as a matter where a dispute mechanism is required, should there be a difference of opinion with the Emergency Services.</i></p>	<p>Provisions to secure such consultation can be dealt with under Principal Issue 14 , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b><u>Recommendation 10.8</u></b></p> <p><i>A multi-agency Emergency / Incident Response Plan for the tunnel should be a requirement of the DCO, for approval by the Secretary of State in consultation with the Emergency Services. The Emergency / Incident Response Plan should be a control document.</i></p>	<p>This matter can be dealt with under Issue , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p> <p>Alternatively, this could be dealt with under a new ESSP SG Principal Issue to cover all ESSP SG concerns.</p>
<p><b>Area of Concern : Suicide prevention, mental health and wellbeing</b></p>	
<p><b><u>Recommendation 11.1</u></b></p> <p><i>The HEqIA and ES Chapter 13 should be revised to cover potential impacts on the mental health and wellbeing of the workforce (and closely related elements of the supply chain) engaged in the construction phase of the LTC, including those who do not currently live in the area. Any requirements for mitigation of adverse impacts should be linked to the Construction Code of Practice. The review should take into account, among other guidance, the Kent and Medway Suicide Prevention Strategy, and the ESSP Steering Group, should be involved in this review.</i></p>	

<p><b><u>Recommendation 11.2</u></b></p> <p><i>Any contractor engaged in the construction of the LTC should be required to become a supporter partner of Mates in Mind, which would help to ensure that best practice is followed across the project, consistent with CoCP Table 4.1 and the Highways England Environmental Manager responsibilities to integrate with the Quality and Health, Safety, Security and Welfare (HSSW) team for ... a joint assurance focus. This approach should be pursued from the outset, including preparations for the enabling works stage.</i></p>	<p>It is suggested that these matters 11.1 – 11.4 are dealt with as part of Health Issues under Issue 13.</p> <p>Securing any necessary mitigation arising from these matters not already addressed under Issue 13 can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery. .</p>
<p><b><u>Recommendation 11.3</u></b></p> <p><i>The current scheme design should be reviewed in terms of whether it has incorporated adequate measures to reduce the risk of suicide during the construction and operational phases, in particular having regard to the Public Health England document Preventing Suicide in Public Places. Any deficiencies in this regard should be reflected in changes to the preliminary design where these would require changes to the description of the authorised Works, the General Arrangement Drawings, the CoCP or requires additional land.</i></p>	
<p><b><u>Recommendation 11.4</u></b></p> <p><i>In addition, further guidance for including suicide prevention measures through development of the detailed design should be included in the Design Principles. This would ensure that all aspects of the detailed design - such as bridges, landscape boundary enclosures, and fencing of public rights of way – address the need for suicide prevention measures.</i></p>	
<p><b>Area of Concern : Future threats</b></p>	
<p><b><u>Recommendation 12.1</u></b></p> <p><i>The scheme documents should provide a commitment to ensuring emergency services communications coverage (including forthcoming transfer from Airwave to the new Emergency Services Network) along the entire route and in the tunnel in terms of mast provision and secure protection, cabling, RVPs and possible emergency service hubs.</i></p>	<p>The ESSP SG considers that the priority for this matter is to secure appropriate consultation and commitments, which can be discussed under Principal Issue , if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery.</p>

<p><b>Recommendation 12.2A</b> <i>clear statement should be made regarding which of the major developments planned for the area of influence for the LTC have been taken into account when assessing the effects of the project through the construction and operational phases.</i></p>	<p>The ESSP SG continues to examine the submitted documents to confirm and evaluate this information.</p>
<p><b>Recommendation 12.3</b></p>	
<p><i>A five-yearly review of the impacts of the LTC on the emergency services should be set up, to cover the construction phase and the first 30 years of the operational phase of the development.</i></p>	<p>Securing mitigations arising from such discussions can be dealt with under Principal Issue 14, if that covers mechanisms such as the CoCP/REAC or SACR to ensure consultation/engagement and security of mitigation delivery</p>