

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

**Submission for Examination Deadline 1
– 18 July 2023**

**Emergency Services & Safety Partners
Steering Group (ESSP SG)**

Written Representation

Introduction

1. The Emergency Services and Safety Partners Steering Group (ESSP SG) is made up of emergency services (police, fire and rescue, and ambulance) and other safety partners (principally local authority emergency resilience teams) affected by the proposed Lower Thames Crossing. The ESSP SG members consider that they have an important role, given their extensive experience and statutory functions, in helping to ensure that if the proposal is granted a development consent order, its construction and operation will be safe and secure; and any additional burden on emergency service and safety partner resources will be minimised and mitigated as far as possible.
2. The ESSP SG has submitted its Relevant Representation to the Examining Authority (ExA) ([RR-0291](#)). In its Relevant Representation, the ESSP SG outlined its concerns regarding the Lower Thames Crossing Development Consent Order submissions made by the Applicant (National Highways). That Relevant Representation was set against the 56 Recommendations which the ESSP SG had submitted to the Applicant in September 2021, as part of the Community Impacts Consultation.
3. The 56 Recommendations of September 2021 (and hence also the ESSP SG's Relevant Representations) form cover a wide range of matters. In accordance with the advice contained in the Rule 6 and Rule 8 letters issued by the ExA, 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, and will include the 56 Recommendations as Appendix C to that document. A Track Changes version of the Statement of Common Ground forms Annex A to this Written Representation. This Written Submissions seeks to provide further information to the ExA regarding the ESSP SG's concerns, clarifying comments made in the draft SoCG.

Key Concerns for the ESSP SG

4. The overarching issue for the ESSP SG is the significant gap which currently exists between the 56 Recommendations made by the group, and what the Applicant has provided in the DCO submission. The ESSP SG considers that although some progress has been made on certain matters, overall these are significantly outweighed by the number of unresolved issues and failure of the Applicant to respond in a timely and substantive manner.
5. Annex A to this Written Representation comprises a track changed version of the current draft SoCG, which sets out the original ESSP SG Recommendations summarised and grouped into topics; together with the ESSP SG's further changes in response to the Applicant's position. Despite the 56 Recommendations having been made in September 2021, it was over a year before the Applicant's position on each matter was made clear. On most matters the Applicant's position has not changed significantly.
6. The remainder of this section of this Written Representation identifies eight '**Key Concerns**' for the ESSP SG, labelled A - H. For each **Key Concern** the text seeks to expand on the content of the SoCG to set out the ESSP SG position more fully.

A Securing satisfactory consultation and engagement on the details of the scheme design, construction and operation

(See Tables 1 and 2 below for references to relevant SoCG items and ESSP SG Recommendations).

Timeline of consultation

7. Consultation is a very important issue for the ESSP SG. The Steering Group recognises that at this point in time not all details of the LTC are available for scrutiny, and that many items are intended to be the subject of subsequent development and approvals. However, running through many of the matters contained in the group SoCG is a concern that the proposals for further consultation and engagement with the ESSP SG are unsatisfactory, and/or are not secured. This concern relates to fundamental aspects of the LTC through its detailed design, construction and operational phases.
8. Prior to early 2021, consultation on the emerging LTC proposals with the emergency services and safety partners was carried out by the Applicant using the Tunnel Design and Safety Consultation Group (TDSCG) model, as set out in guidance document CD352 of the Design Manual for Roads and Bridges. Member experience of this format was not complimentary for a number of reasons:
 - that as time went on, previously discussed scheme elements were presented in amended form with little or no discussion in the interim;
 - insufficient explanation and rationale was provided for the changes. Conversely, suggestions from ESSP SG member organisations or actions did not appear to have been comprehensively reflected in meeting notes, or acted on to develop the proposals. Examples include changes from a three lane road scheme to a two lane scheme without prior consultation; and inadequate development and sharing of emergency planning evolution.
 - Previous meeting notes were mainly not reviewed or actions progressed at subsequent meetings

- The number of meetings which took place between the Applicant and members is not considered to indicate productive engagement leading to progress, but often was considered by members more like an exercise in the Applicant going through the motions to satisfy internal, DMRB guidance requirements.
 - The membership of the TDSCG only reflected certain organisation north of the River Thames, it now has more local authority representation and the ESSP SG is considered more comprehensively representative of all parties.
9. Consequently, members therefore decided to move away from the TDSCG, and instead set up a Steering Group where members could take charge of their consideration of relevant issues; and, present a collective, coordinated response to the Applicant's proposals. The ESSP SG was formed in early 2021 and embarked on a programme of work to consider the main issues of concern to its members. This was based initially around the LTC scheme proposals which had been contained in the previous pre-submission draft of 2020, and moved on to consider the information published for the Community Impacts Consultation of September 2021. This work culminated in the ESSP SG response dated 8 September 2021, which included a total of 56 Recommendations.
10. An initial summary RAG response to the Recommendations was received from the Applicant in November 2021, and some discussions on relevant topics continued through 2022. However, a detailed response on many of the issues was not forthcoming and progress on topics such as safety and security was slow. The ESSP SG response to the Local Refinements Consultation dated 20 June 2022 (included as Annex C to this Written Representation) expresses the Steering Group's concerns over the lack of progress at that time.
11. As mentioned above, the Applicant's position on many of the Steering Group's concerns only became clear over a year after the 56 Recommendations had been made, during initial drafting of the SoCG and shortly before the DCO was submitted in October 2022. Up until the pre-acceptance phase, the ESSP SG had not been offered sight of the Applicant's proposals to understand how its concerns and Recommendations might have been addressed.

Proposed engagement through the Tunnel Design and Safety Consultation Group (TDSCG, DMRB CD352)

12. As set out in the Statement of Common Ground, the Applicant proposes to use the TDSCG to consult with the Emergency Services on nine matters in the SoCG, and these are set out in Table 1 on the following page. These matters include the detailed tunnel and road design (and its component parts); but also the development of emergency planning measures which would apply during the operational phase of the LTC.
13. In addition, although the DCO submissions offer a commitment to provide emergency services RVPs, there is no provision to secure satisfactory consultation with the Emergency Services on their detailed provision (SoCG item 2.1.25, ESSP SG Recommendations 6.1 – 6.4).
14. Given its previous experiences described above, the ESSP SG is not satisfied that the TDSCG model is the best way for its members to engage with the Applicant and be consulted on the scheme proposals moving forwards. DMRB CD352 is guidance only, published by the Applicant's predecessor body Highways England, but is not part of the DCO submissions. The TDSCG does not appear to be referred to in any of the DCO documents; and, the draft DCO Order itself ([AS-038](#)) does not include provisions

to secure comprehensive consultation with the Emergency Services on the matters set out in Table 1 on the next page, whether through the TDSCG or by any other means. The terms 'emergency services' or 'safety partners' is not legally defined in the draft DCO Order itself. Draft DCO ([AS-038](#)) Schedule 2 Requirement 3 states as follows:

'3.—(1) The authorised development must be designed in detail and carried out in accordance with the design principles document and the preliminary scheme design shown on the engineering drawings and sections, and the general arrangement drawings, unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with the relevant planning authority on matters related to its functions, provided that the Secretary of State is satisfied that any amendments to those documents showing departures from the preliminary scheme design would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.'

15. Requirement 3 does not directly require consultation with the Emergency Services on the detailed design. Under this Requirement, the Applicant is only required to consult with the Emergency Services on the detailed design if the Design Principles document ([APP-516](#)) includes such a requirement. The only Design Principles that require consultation or engagement with the Emergency Services are at Clause S6.01 in respect of extending tunnel cross-passage spacing and on the specification for a Fixed Fire Fighting System:

S6.01	Spacing of tunnel cross passages	<p>The distance between tunnel cross-passages will be in accordance with DMRB CD 352 Design of road tunnels (Highways England, 2020c), and supported by risk assessment, is currently proposed to be 150m maximum between passage centre line. If departures are applied from the standard and the cross-passages are more than 150m apart from each other, there shall be engagement with emergency services on their distance.</p> <p>To support cross-passage spacing of 150m between centre lines, a Fixed Fire-Fighting System (FFFS) will be deployed within the tunnel bore. There shall be engagement with the emergency services on the type and specification of the FFFS.</p> <p>Emergency services refers to the 'blue-lights' services, being Kent Police, Kent Fire and Rescue, Essex Police, Essex Ambulance, Essex County Fire and Rescue, South East Coast Ambulance Service, Metropolitan Police, London Fire Brigade and London Ambulance Service.</p>
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16. Draft DCO ([AS-038](#)) Schedule 2 Requirement 20 states as follows:

'20.—(1) Where any paragraph in this Schedule requires the undertaker to consult with any authority or statutory body, the undertaker must—
 (a) subject to sub-paragraph (2), provide that authority or statutory body with not less than 28 days from the provision of any documents being consulted upon for any response to the consultation;
 (b) give due consideration to any representations made by that authority or statutory body about the proposed application; and
 (c) include with its application to the Secretary of State copies of any representations made by that authority or statutory body about the proposed application, and a written account of how any such representations have been taken into account in the submitted application.'

17. The Applicant has confirmed in the draft Statement of Common Ground that it does not consider the Emergency Services to be a statutory body; but that it will consult with the Steering Group on the detailed design through the TDSCG.
18. The ESSP SG objects to this approach. The ESSPSG's preference is for the Emergency Services to be named in the DCO as consultees on the development of the detailed design, and on operational matters such as Emergency Incident Management / Response Plans. The Emergency Services can then alert their Safety Partner colleagues when submissions are made; and ensure that a comprehensive, cross-agency response is provided using the Steering Group meetings and other discussions. This would secure appropriate consultation. Currently, not even consultation through the TDSCG appears to be secured in the DCO submissions.

Table 1 -: Matters which the Applicant proposes to address through the Tunnel Design and Safety Consultation Group		
SoCG Topic	SoCG Item no.	ESSP SG Recommendation
Content of the draft Development Consent Order (dDCO) and control documents and supporting documents – a) the detailed design d) the landscaping scheme f) the means of enclosure	2.1.1a	2.1, part 1
	2.1.1b	2.1, part 2
Detailed tunnel design consultation	2.1.9	10.7
Tunnel evacuation assembly areas	2.1.13	9.1
Emergency Incident Management/Response Plans (operational phase)	2.1.21	2.4 and 5.7
Emergency access roads provision	2.1.22	5.5 and 5.6
Emergency preparedness procedures – Communication equipment	2.1.23	5.4 and 12.1
Tunnel emergency access roadways	2.1.24	5.8
Emergency Hubs	2.1.26	7.1
Emergency Response/ Incident Management Plans (operational phase)	2.1.29	9.2 and 10.8

Proposed engagement on other matters

19. In its 56 Recommendations of September 2021, the ESSP SG also requested that satisfactory consultation and engagement arrangements are secured for matters which

do not form part of the detailed design or other items identified in Table 1 above. These matters are identified in Table 2 below, and relate to both the construction phase and the operational phase of the project.

Table 2 -: Matters which the Applicant proposes to address through consultation outside of the Tunnel Design and Safety Consultation Group		
SoCG Topic	SoCG Item no.	ESSP SG Recommendation
Content of the draft Development Consent Order (dDCO) and control documents and supporting documents: b) and c) EMP2, EMP3 e) Traffic Management Plans g) traffic impact monitoring scheme	2.1.1a	2.1, introduction
	2.1.1b	2.1, part 2
Security during Construction	2.1.2	4.1, 4.2, and 4.3
Procedures and requirements for the development of Contractor emergency preparedness and response plans	2.1.3	5.1, 5.3, and 10.1
Protest Plan	2.1.7	3.2
Traffic Management Plans and Traffic Management Forum	2.1.10	8.4 and 8.5
Funding for co-ordination officer, Steering Group member officer time and service staffing and vehicles	2.1.17	2.2
Emergency Incident Management/Response Plans (construction phase)	2.1.21	2.4 and 5.7

20. The ESSP SG acknowledges that the application submissions provide for some consultation with the Emergency Services on some of the above matters such as on the development of EMP2. However, as set out in the SoCG:
- a) for some issues it remains unclear to the ESSP SG how and by whom it will be consulted, and the scope of such consultation – see for instance SoCG item 2.1.1b;
 - b) the Applicant refers to some documents which do not form part of the submissions and on which the ESSP SG has not been consulted. These include the project's Physical Security Execution Plan, which it is intended to use as the basis for contractors to develop their Security Management Plans. It is not clear to the ESSP SG how consultation with the Emergency Services is secured (see SoCG item 2.1.7).

21. In its current form, the ESSP SG objects to this approach. As set out in the SoCG, the ESSP SG seeks clarification of where and how satisfactory consultation is secured to address these issues.

Conclusions on consultation and engagement

22. Overall, it is clear from the above that the ESSP SG is currently not satisfied that the current DCO submission would secure satisfactory consultation and engagement with the Emergency Services (and hence also the Safety Partners) on a range of issues covering the detailed design, construction and operation of the LTC Project. In turn, this risks the ESSP SG not being able to provide the coordinated, cross-agency input, which it considers is important to ensure this major development will deliver on relevant safety and security matters.
23. The ESSP SG has requested that the Applicant provide the clarifications requested in the SoCG, in the form of a ‘road map’ showing:
- how and by whom the Emergency Services will be consulted on each of the matters related to its Recommendations (identified in Tables 1 and 2 above); and
 - how that consultation is secured in the submissions (if that is the case).
24. The ESSP SG has also suggested to the Applicant that the ‘road map’ has the potential to help narrow the differences between the parties; and where these cannot be resolved, it could assist the ExA in their consideration of the proposals.
25. The ESSP SG welcomes the Applicant’s agreement to provide such a ‘road map and awaits receipt of the first draft of the document. In order to be fully effective, the “road map” (or some elements of it) would have to be secured as a commitment, either:
- a) by becoming a Control Document or be secured through the DCO by some other means; or
 - b) by including it in a side agreement by the Applicant with the ESSP SG.

B - Securing Rendez-Vous Points (RVP) and Emergency Hubs

(See SoCG items 2.1.25 and 2.1.5, ESSP SG Recommendations 6.1 – 6.4; and Annex B to this Written Representation)

26. Discussions between ESSP SG and the Applicant during the first part of 2022. This resulted in the detailed advice provided to the Applicant dated 9 March 2022 which is included at Annex B to this Written Representation.
27. RVPs are shown on the submitted General Arrangement Plans Volume B ([APP-016](#), Sheet 13 and Sheet 20) and Works Plans Volume B ([APP-019](#), Sheet 13 and Sheet 20) s at the north and south tunnel portals, and referred to in the Design Principles ([APP-516](#)) as follows:

Table 5.3 S3.20

S3.20	Emergency Services Rendezvous Point (RVP)	An Emergency Services Rendezvous Point (RVP) area shall be provided
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Table 5.5 S9.21

S9.21	Emergency Services Rendezvous Point (RVP)	An Emergency Services Rendezvous Point (RVP) area shall be provided
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28. Emergency hubs are also shown on the scheme drawings. However, the following points are raised:
- a) the ESSP SG objects to the location of the northern RVP – this location is considered unsuitable, being too close to the tunnel portal. RVP locations should allow resources to muster ahead of the project, to receive briefing and direction in a position which will not be affected by any ongoing incident. It is not clear to ESSP SG how its advice in Annex B has been taken into account.
 - b) the ESSP SG has concerns regarding the size of the RVPs – these should be large enough to house a small building, lighting, power and parking facilities for approximately 30 - 40 vehicles. It is not clear that this will be the case, particularly for the southern RVP, which is much smaller. No further detail has been forthcoming since issuing the advice contained in Annex B (particularly paragraphs 30 and 31).
 - c) considers that there are other potential locations which could be used as a contingency. The ESSP SG previous advice (see Annex B to this Written Representation, in particular paragraphs 18 - 22) was that an additional site should be provided in addition to the primary RVP close to the southern tunnel portal. One location, , approximately 1-2 miles away from the southern tunnel portal , should be created for this purpose.
 - d) The ESSP SG considers that the previously suggested secondary RVP alongside the A13 Westbound slip road on to the southbound LTC should be identified on the scheme drawings (see paragraph 17 of Annex B to this Written Representation).
 - e) Although additional, temporary or “ad hoc” RVPs (beyond those mentioned above) need not necessarily be identified on the scheme drawings, the ESSP SG considers that provision for these should be addressed through emergency and operational plans (see paragraph 23 of Annex B to this Written Representation). These could take the form of temporary areas, brought into use when needed for RVP purposes; or small but more permanent but dual-use areas such as the location already identified in discussion with the Metropolitan Police at Junction 29 on the M25. This should be made a secured requirement of the response plans (see Concern G below).
 - f) The ESSP is concerned at both the lack of detail for matters related to RVP provision (such as evacuation assembly areas, and emergency access roads) and the absence of consultation over the emergency hubs shown on the submission drawings, – it is unclear how these preliminary hub designs have been drawn up. This is important because it raises question marks about how a properly joined up approach will be delivered as the scheme design and operational plans progress (also see concern G of this Written Representation, below).

29. As set out under Key Concern A above, the ESSP SG also objects to the arrangements for engagement on the detailed scheme design (including the RVPs and emergency hubs) currently suggested by the Applicant, which uses the TDSCG approach and also does not secure a commitment to satisfactory consultation.

C - Designing for Safety and Security

(See SoCG item 2.1.11, and also in relation to 2.1.2 and 2.1.32 - and ESSP SG Recommendations 4.2, 4.4, 4.5 and Appendix B, but also recommendations 4.1 and 4.6).

30. The ESSP SG welcomes, in general:
- a) the Applicant's references in Section 6.7 of the CoCP ([APP-336](#)) to the Centre for the Protection of National Infrastructure (CPNI) (now the NPSA) guidelines and to the Project's Security Management Plan (SMP) and Physical Security Execution Plan (PSEP (SoCG 2.1.2)).
 - b) the Applicant's general statements regarding addressing safety and security through the construction phase, and in the detailed design of the project (SoCG 2.1.11).
 - c) the Applicant's statements regarding best practice in relation to prevention of modern slavery, including for the design of the worker accommodation (SoCG 2.1.32)
31. However, some of the documents referred to by the Applicant, including the SMP and PSEP are not contained within the DCO submission and have not been made available to the ESSP SG, despite the expertise of the group members in this area. As set out in Annex C to this Written Representation, a Security Working Group was proposed a considerable length of time ago, but has made very little progress towards satisfying the Steering Group that its recommendations will be adopted and acted on. These concerns are coupled with a lack of clarity regarding the Joint Operations Forum (JOF); and the ESSP SG's objections to concerns over the applicant's suggested reliance on the TDSCG to consult on detailed design issues (as set out under Key Concern A above).
32. Consequently, the ESSP SG objects to the DCO as submitted, as it does not secure a safe and secure scheme during the construction and operational phases.

D - Tunnel design and cross-passage spacing

(See SoCG items 2.1.14, and ESSP SG Recommendations 10.2 and 10.4)

33. Unfortunately, there has been relatively little progress on tunnel design since the ESSP SG made its Recommendations in September 2021. For instance, there has been very little discussion around the safety aspects of the tunnel design, Fixed Fire Fighting System, tunnel ventilation, fire fighting water supplies, evacuation proposals and the preparedness of contractors to provide emergency response should there be an incident in the tunnel during the construction phase. This does not bode well for consultation and engagement over the detailed scheme design, should the DCO be granted

34. Specifically, the ESSP SG currently maintains its objections to the proposals in Design Principle S6.01 in Table 5.4 ([APP-516](#)) which states that:

S6.01	Spacing of tunnel cross passages	<p>The distance between tunnel cross-passages will be in accordance with DMRB CD 352 Design of road tunnels (Highways England, 2020c), and supported by risk assessment, is currently proposed to be 150m maximum between passage centre line. If departures are applied from the standard and the cross-passages are more than 150m apart from each other, there shall be engagement with emergency services on their distance.</p> <p>To support cross-passage spacing of 150m between centre lines, a Fixed Fire-Fighting System (FFFS) will be deployed within the tunnel bore. There shall be engagement with the emergency services on the type and specification of the FFFS.</p> <p>Emergency services refers to the 'blue-lights' services, being Kent Police, Kent Fire and Rescue, Essex Police, Essex Ambulance, Essex County Fire and Rescue, South East Coast</p>
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35. The ESSP SG is concerned at this approach for the following reasons:

- a) the spacing of cross passages should not be dictated solely by considerations of tunnel user survival. For instance, it is not clear that the full range of potential impacts on the health and well-being of emergency service personnel (including but not necessarily restricted to fire crews) arising from the proposed cross-passage spacing has been taken into account through the Operational Risk Assessment. Personnel from Fire and Rescue, Ambulance and Police services entering the tunnels may have to carry significant equipment (such as breathing apparatus) and wear PPE, which could affect their ability to move between refuges / cross passages.
- b) it is not clear to the ESSP SG that the potential impacts of the proposed cross passage spacing on emergency response strategies, plans and their alternative options has been taken into account.
- c) there is an apparent reliance on a formula in the Operational Risk Assessment for the tunnel, which includes a parameter that may not be consistent with tunnel fire engineering. The ESSP SG is investigating this point further.

36. The Applicant has not, to date, responded to these concerns, some of which date from the TDSCG (i.e. pre-ESSP SG) discussions.

37. As set out under Key Concern A above, the ESSP SG also objects to the arrangements for engagement on the detailed scheme design (including the detailed tunnel design and cross-passage spacing issues) currently suggested by the Applicant, which uses the TDSCG approach and does not secure a commitment to satisfactory consultation.

E - Mitigation funding

(See SoCG items 2.1.17 and 2.1.20; and ESSP SG Recommendations 2.2 and 9.3)

38. The ESSP SG identified within its September 2021's 56 Recommendations a number of areas where the Project could potentially have an adverse effect on the ability of

members to carry out its duties and/or present an increased burden on resources. These fall into three main areas:

a) **funding for additional emergency service staffing and vehicles to mitigate additional burdens during the construction phase**

Essex Police have submitted a proposal and justification to the Applicant to support this funding request. The Applicant's position is that they will not provide funding from one central government-funded source to another.

b) **reimbursement provisions for local authority and emergency service for the costs of dealing with major incidents on the LTC**

The Applicant's position is that they will not provide funding from one central government-funded source to another.

c) **funding for a co-ordination officer and in-house officer time to ensure the ESSP SG can respond to relevant consultation on the detailed design and construction phase documentation submitted for approval**

Previously, the Applicant indicated that it would consider funding such posts as it was considered this work was not 'business as usual' for the ESSP SG members. However, the Applicant changed its position on this point, and now states that they will not provide funding from one central government-funded source to another.

39. The ESSP SG notes from the responses of the Applicant as set out in the SoCG (items 2.1.17 and 2.1.20) that they do not rule out the possibility of there being impacts on the activities of the Steering Group members, which would place an additional burden on their resources, and which might justify mitigation. Impacts and burdens on the Emergency Services and Safety Partners during the design, construction, and initial operational phases (when further monitoring and mitigation measures are to be explored) does not represent a "business as usual" situation. The ESSP SG considers that the most important point here is not how its members and the Applicant are funded from central government. Rather, it is whether the developer and 'operator' of the LTC should bear the costs of justifiable mitigation which is required to make the scheme acceptable, also bearing in mind that the scheme is proposed as a toll road generating income.
40. The ESSP SG intends to develop further costings for the mitigation items identified above, and will submit them to the ExA in due course for discussion. Such funding could be provided via a side agreement(s).

F - Emergency Services response times

(See SoCG items 2.1.27 and 2.1.28, and ESSP SG Recommendations 2.3, 8.1, 8.2 and 8.3)

41. The ESSPSG members have been working with the Applicant on this issue to assess the potential impacts of the construction and operation of the road on the ability of the Emergency Services to achieve their targets for responding to incidents in the area around the Project. Such impacts might result from factors leading to increases in journey times, such as temporary road closures during construction or localised increases in traffic congestion during the operational phase. Response times might be adversely affected when attending incidents both on the proposed LTC itself, and incidents elsewhere within the area.

42. The ESSP SG recognises that the Project has been altered to provide emergency access roads to the tunnel portal areas and elsewhere on the route and this will assist in avoiding a deterioration in response times, particularly when attending incidents on the LTC itself. However, if nevertheless adverse impacts on Emergency Service response times are likely, then the ESSP SG will seek from the Applicant the provision of mitigation measures, though currently it is not known what form these might take.
43. The ESSP SG will provide an update to its position on this area of concern once it has received all the outputs of modelling being undertaken by the Applicant. However, this response time modelling will itself be derived from the strategic LTAM modelling used by the Applicants in their transport assessment work. Concerns have been expressed elsewhere - including by local authorities, some of whom are members of the ESSP SG - that such modelling may not be sufficiently fine-grained to fully identify impacts in the way that could be achieved if more local operational modelling for construction were used.

G - Emergency access, preparedness and response planning

(See SoCG items 2.1.13, 2.1.21, 2.1.22, and 2.1.24; and ESSP SG Recommendations 9.1, 2.4, 5.4, 5.7, 12.1, 9.2, 10.8, 5.5, 5.6 and 5.8 and 10.4)

44. The ESSP SG welcomes the inclusion of emergency access roads within the scheme. However, the Group has remaining concerns at the absence of detail for these roads; and almost none of the other planning for incident responses, both during the construction phase and the operational phase has been discussed with the ESSP SG. This is important because it raises question marks about how a properly joined up approach will be delivered. For instance, there is significant concern that evacuation assembly areas have not been identified; and it is not clear how the potential for conflicts between members of the public and emergency vehicles using proposed access roads to and from RVPs will be dealt with (see for example where this point was raised previously at paragraphs 9, 16 and 20 of Annex B to this Written Representation).
45. Even at a strategy / framework level, this work appears to have been postponed by the Applicant; and is not clearly provided for in the DCO submission documentation. This is disappointing, as these issues were raised historically through the TDSCG and again in the 56 Recommendations of September 2021 and yet no clear strategy or framework seems to be in place.
46. There is a lack of clarity on what contractor emergency preparedness procedures should include for the construction phase; and no requirement relating to the enabling works. As set out under Key Concern A above, the ESSP SG also objects to the arrangements for engagement on the detailed scheme design (including the emergency access roads and evacuation areas) currently suggested by the Applicant, which uses the TDSCG approach, and does not secure a commitment to satisfactory consultation. There is also a concern that other topics which should be covered in emergency response plans – such as smaller temporary/ad hoc RVPs – do not appear to have been secured in the application documents.

H - Mental health, well-being and suicide prevention

(See SoCG items 2.1.33, 2.1.34, and 2.1.35; and ESSP SG Recommendations 11.1 – 11.4)

47. The ESSP SG concerns for this topic cover impacts and risks both during the enabling and construction phases (including in relation to the workforce); and through the scheme design and into the operational phase.

48. The Applicant has responded to the ESSP SG Recommendations 11.1 and 11.2 regarding the previous omission of workforce mental wellbeing by now including it in the Health and Equalities Impact Assessment (HEqIA ([APP-539](#)) and Environmental Statement Chapter 13, with a reference (within the REAC ref No. PH002) in the CoCP ([APP-336](#)) Register of Environmental Actions and Commitments (REAC). The ESSP SG has made a number of further requests in the SoCG as to how these statements should be expanded and clarified, to more comprehensively cover the issues and ensure that they become secured commitments– see SoCG item 2.1.33 and 2.1.35.
49. In relation to Recommendations 11.3 and 11.4, the ESSP SG recognises that the Applicant has been working with bodies such as the Samaritans and the Transport Research Laboratory to develop tools examining the characteristics of structures to determine their level of risk. The Applicant has also stated (SoCG item 2.1.34) that their Suicide Prevention Strategy and Suicide Prevention Toolkit will be used on the project. However, it is noted that the Applicant’s responses:
- a) appear to focus solely on final scheme design, and do not integrate across all of the project phases to ensure that contractors take appropriate steps to limit the risk of suicide involving structures and scheme features while under construction;
 - b) in respect of final scheme design, do not provide a firm commitment in the application documents – for instance suicide prevention is not secured in a Design Principle with reference to the aforementioned prevention strategy and toolkit.
50. As set out under Key Concern A above, the ESSP SG also objects to the arrangements for engagement on the detailed scheme design (including design for suicide prevention) currently suggested by the Applicant, which uses the TDSCG approach and does not secure a commitment to satisfactory consultation.