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)

Annexes to Written Representation

Annex A	Draft Statement of Common Ground Between the Applicant and the Emergency Services and Safety Partners Steering Group – Track Changes 10 July 2023	PDF pages 2 - 56
Annex B	ESSP SG Rendez Vous Point Recommendations 9 March 2022	PDF pages 57 - 64
Annex C	ESSP SG Response to Local Refinements Consultation 20 June 2022	PDF pages 65 - 69

Annex A:

Draft Statement of Common Ground Between the Applicant and the Emergency Services and Safety Partners Steering Group -Track Changes

10 July 2023



Lower Thames Crossing

5.4.3.5 Draft Agreed Statement of Common Ground between (1) National Highways and (2) the Emergency Services and Safety Partnership Steering Group (ESSP SG)

APFP Regulation 5(2)(q)

Infrastructure Planning (Examination Procedure) Rules 2010

DATE: July 2023 DEADLINE: 1

Planning Inspectorate Scheme Ref: TR010032 Application Document Ref: TR010032/EXAM/5.4.3.5

VERSION: 1.0

Revision history

Version	Date	Submitted at
1.0	18 July 2023	Examination Deadline 1

Status of the Statement of Common Ground

If agreed (i.e., Previously referred to as signed)

This is a Draft Agreed Statement of Common Ground with matters outstanding.

National Highways and ESSP SG agree that this draft Statement of Common Ground is an accurate description of the matters raised and the current status of each matter.

Insert screen shot of email confirmation here

A high-level overview of the engagement undertaken to date is summarised in Table A.1 in Appendix A.

If not agreed/unsigned (i.e. NH view of the matters)

This is a Draft Statement of Common Ground with matters outstanding.

National Highways considers that this draft Statement of Common Ground is an accurate description of the matters raised by ESSP SG and the status of each matter, based on the engagement that has taken place to date.

A high-level overview of the engagement undertaken since the DCO application was submitted on 31 October 2022 is summarised in Table A.1 in Appendix A.

Lower Thames Crossing

5.4.3.5 Draft Agreed Statement of Common Ground between (1) National Highways and (2) the Emergency Services and Safety Partnership Steering Group (ESSP SG)

List of contents

			Page number
1	Intro	oduction	1
	1.1	Purpose of the Statement of Common Ground	1
	1.2	Parties to this Statement of Common Ground	1
	1.3	Rule 6 Instruction	<u>2</u> 2
	1.4	Principal Areas of Disagreement	<u>3</u> 2
	1.5	Terminology	<u>3</u> 3
2	Matt	ers	<u>4</u> 4
	2.1	Movement of outstanding matters	<u>4</u> 4
App	endix	A Engagement activity	<u>46</u> 30
App	endix	B Glossary	<u>48</u> 32
App	endix	C Statement of Commonality <u>Error! Bookmarl</u>	<u>κ not defined.</u> 33
		List of tables	
			Page number
Tab	le 2.1	Matters	<u>4</u> 4
Tab	le A.1	Engagement activities between the Applicant and ESSP SG	4 <u>6</u> 30

1 Introduction

1.1 Purpose of the Statement of Common Ground

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared in respect of the Development Consent Order (DCO) application for the proposed A122 Lower Thames Crossing (the Project) made by National Highways Limited (National Highways) to the Secretary of State for Transport (Secretary of State) under section 37 of the Planning Act 2008 on 31 October 2022.
- 1.1.2 The SoCG has been produced to confirm to the Examining Authority where agreement has been reached between National Highways (the Applicant) and Emergency Services and Safety Partnership Steering Group (ESSP SG) and where agreement has not been reached, and where matters are under discussion. Where matters are yet to be agreed, the parties will continue to work proactively to reach agreement and will update the SoCG to reflect areas of further agreement.
- 1.1.3 This first version of the SoCG has been submitted at Examination Deadline 1.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared in respect of the Project by (1) National Highways, and (2) Emergency Services and Safety Partnership Steering Group (ESSP SG).
- 1.2.2 For the purposes of the SoCG, the emergency services refers to the 'blue-lights' services:
 - a. Kent Police
 - b. Kent Fire and Rescue Service
 - c. Essex Police
 - d. East of England Ambulance Service NHS Trust
 - e. Essex County Fire and Rescue Service
 - f. Southeast Coast Ambulance Service NHS Foundation Trust
 - g. Metropolitan Police
- 1.2.3 The Project's engagement with the emergency services was previously through the Tunnel Design and Safety Consultation Group (TDSCG) from January 2018 to February 2021 when it was superseded by the ESSP SG which is a group comprising the blue-lights members identified at

paragraph 1.2.2 above plus the safety partners who are the local authorities affected by the Project. ¹ The local authorities in question are:

- Thurrock Council
- b. Gravesham Council
- c. Kent County Council
- d. Essex County Council
- 1.2.4 Engagement with the ESSP SG has mostly been through National Highways' The Applicant's attendance at relevant parts of the ESSP SG's monthly meetings.

1.3 Rule 6 Instruction

- 1.3.1 Following publication of the Rule 6 letter on the 25 April 2023 which requested new SoCGs, with three Police Services (Essex Police, Kent Police and Metropolitan Police) the Applicant engaged with the parties to work towards progressing these individual SoCGs..
- 1.3.2 Kent Police and Essex Police confirmed that they wished to pursue individual SoCGs and as such, the Applicant has produced these documents alongside this ESSP SG SoCG. Where matters are solely related to Kent Police and Essex Police they have not been incorporated into this SoCG. These SoCGs will be submitted at Examination Deadline

 1. Where matters appear in both the ESSP SG SoCG and those of Kent and Essex Police forces, there may be differences in position with regards to the item and its status. The position within this document reflects that of the ESSP SG as a whole; whereas the SoCGs of Essex Police and Kent Police have been prepared from a specific policing perspective.
- 1.3.3 Metropolitan Police confirmed that they do not consider it necessary to enter into a SoCG, but has not yet and has confirmed their position to PINs.
- 1.3.4 In order to identify themes of commonality to assist the Examining Authority, the Applicant has produced a Statement of Commonality Matrix for these SoCGs (Appendix C). The matrix currently includes the status of matters in SoCGs from the ESSP SG, Essex Police and Kent Police. If further SoCGs with other emergency services are drafted, they will be included in the matrix.

¹ The ESSP SG has also received input from the Samaritans on specific issues.

1.4 Principal Areas of Disagreement

- 1.4.1 On 19 December 2022, the Examining Authority made some early procedural decisions to assist the Applicant, potential Interested Parties and themselves to prepare for the Examination of the DCO application.
- 1.4.2 One of these procedural decisions was to use a tracker recording Principal Areas of Disagreement in Summary (PADS). This tracker is known as the PADS Tracker.
- 1.4.3 The PADS Tracker provides a record of principal matters of disagreement emerging from the SoCG and will be updated alongside the SoCG as appropriate throughout the examination with the expectation that a revised PADS Tracker should be submitted at every Examination deadline.
- 1.4.4 The ESSP SG do not have a PADS Tracker at this point, but will consider the preparation of a PADS Tracker which may be submitted at a later Examination Deadline to assist the Examining Authority

1.5 Terminology

1.5.1 In the matters table in Section Error! Reference source not found.2 of this SoCG, 'Matter Not Agreed' indicates agreement on the matter could not be reached following significant engagement, and 'Matter Under Discussion' where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties. 'Matter Agreed' indicates where the issue has now been resolved.

2 Matters

2.1 Discussion and status of matters

- 2.1.1 The outcome of discussions to date are presented in Table 2.1 which details and presents the matters which have been agreed, not agreed, or are under discussion between (1) the Applicant and (2) ESSP SG.
- 2.1.12.1.2 In Table 2.1, relevant issues relating directly to the dDCO articles and to Requirements in Schedule 2 to the dDCO have been identified under the heading 'DCO and Consents'. Some of the subsequent matters also relate to the wording of the dDCO and Requirements by referring back to earlier matters. Where the ESSP SG have proposed has sought amendments to the wording in the dDCO, the Applicant invited the ESSP SG to provide the proposed wording in the SoCG. Some of these have been provided in Table 2.1, and other items where this is not provided will updated for the next iteration of the SoCG at later examination deadlines.
- 2.1.3 In the column 'Item No' in Table 2.1, 'Rule 6' indicates a matter entered in the SoCG as a result of a request in the Rule 6 letter, 'RRN' indicates a matter entered into the SoCG as a result of content in the Relevant Representation, 'RRE' indicates an existing SoCG matter that was also raised in the Relevant Representation and 'DLX' indicates a new matter added during examination at/around that deadline.
- 2.1.22.1.4 At Examination Deadline 1 there are 37 38 matters in total of which 5 2 matters are agreed, 5 matters which are not agreed, and 31 that remain under discussion. There are currently no matters that are not agreed.
- 2.1.32.1.5 Subsequent versions of this SoCG will outline the changes between versions.
- 2.1.4 The item numbers in Table 2.1 correlate to matters raised in the ESSP SG SoCG and therefore are not in ascending order.

Table 2.1 Matters

2.1.52.1.6 References in the ESSP SG comment section are references to the ESSP SG's Recommendations document submitted in relation to the Lower Thames Crossing Community Impacts Consultation in September 2021, and are set out in in Appendix C to this SoCG.

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
DCO and Consents	i				
Content of the draft DCO and control documents and supporting documents	2.1.1 RRE	The draft DCO should set out clearly the procedures and processes for consultation approval of the detailed design, including those for consultation, so that there is no doubt about how it will be carried out. This requires commitments in the DCO and control documents. The ESSP SG has been unable to locate secured requirements to consult with the Emergency Services on the full range of its concerns regarding the scheme design. Draft DCO Sch 2 Requirement 3 does not require consultation with the Emergency Services; and in relation to Requirement 20 the only commitments to consult with the Emergency Services in respect of the detailed scheme design which have been secured through the Design Principles are in relation to extending cross-passage spacings above 150m and the specification for a Fixed Fire Fighting System within the tunnel. The ESSP SG note that the DMRB CD352 is only guidance, and the TDSCG was considered previously ineffective as a consultation forum.	The draft DCO sets out the procedures and processes for approvals in Schedule 2 Requirement 3. This covers the procedure and process for detailed design. Schedule 2, Part 2 provides the procedure for the discharge of Requirements and consultation. The TDSCG has been used on numerous road tunnel projects over many years; the TDSCG is described in the DMRB CD 352. The Applicant is confident that the TDSCG is the correct forum for future design consultation and are committed to working closely with the emergency services to ensure that the TDSCG works in a format that delivers value for all parties. The ESSP SG has requested that this matter be marked as 'Matter Not Agreed', and the Applicant has reflected this in the status column. However, the Applicant believes there is more to discuss and has offered to engage further to help the ESSP SG understand the Requirements in the draft DCO,	Draft DCO [Additional Submission AS-038]	Matter Under Discussion Matter Not Agreed

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		The ESSP SG also considers there is a lack of proper clarity on exactly what the emergency services will be consulted on through the TDSCG; and how the TDSCG — which has in any case been superseded by the ESSP SG — might operate effectively. Unless a clear commitment is provided setting out acceptable details of how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status. H[Rec 2.1 introduction]	and to identify the procedures and processes for consultation. The Applicant therefore sees this matter as a Matter Under Discussion and the offer for further engagement remains open. The Applicant will engage further to help ESSP SG identify the procedures and processes for consultation.		
	2.1.1a RRE	ESSP SG have requested that a clear definition of the emergency services be included in the draft DCO, to encompass all Police, Fire and Rescue, and Ambulance services areas through which the Project will pass. The requirement in requirement 20 of Schedule 2 of the DCO is in relation to consulting with 'any planning authority or statutory body'. The ESSP SG would like to clarify whether the Emergency Services is included within the statutory body part of this.—A definition of 'emergency services' could be included in the 'Interpretation' section of the draft	The definition of 'Emergency Services' has not been included in the draft DCO." For the avoidance of doubt, the ESSP SG is not considered a statutory body, however the Applicant will consult with the individual emergency services on matters of relevance to them, as set out in Schedule 2 of the draft DCO."	Draft DCO [Additional Submission AS-038]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
	2.1.1b RRE	DCO, possibly cross referring to CoCP Table 2.1 and Para 2.3.1 Unless a clear commitment is provided setting out acceptable details of how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status. [Rec 2.1 point 1] The emergency services are named consultees on the preparation of and submission for approval of: a) The detailed design b) The Environmental Management Plan (EMP, Second Iteration) c) The EMP Third Iteration d) The Landscaping Scheme e) Traffic Management Plans (TMPs) for each part of the construction phase f) 'Means of enclosure' in accordance with Volume 1, Series 0300 of the Manual of Contract Documents for Highways Works. g) The traffic impact	The Applicant has made a commitment in the Code of Construction Practice (CoCP) to liaise with the emergency services in the preparation and submission for approval of the following documents: • EMP2: Once accepted by National Highways The Applicant, the Contractors' EMP2s and topic management plans will be submitted to the Secretary of State (SoS) for approval as per Schedule 2, Part 2 of the draft DCO after engagement with the bodies in Table 2.1 of the oTMPfC on matters related	Environmental Statement (ES) Appendix 2.2: Code of Construction Practice (CoCP) [Application Document APP-336] Outline Traffic Management Plan for Construction (oTMPfC) [Application Document APP-547]	Matter Under DiscussionNot Agreed
		monitoring scheme.	to their functions.		

- P	ltem number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		A key concern is that the only commitments to consult with the Emergency Services in respect of the detailed scheme design which have been secured through the Design Principles are in relation to extending cross-passage spacings above 150m and the specification for a Fixed Fire Fighting System within the tunnel. The ESSP SG note that the DMRB CD352 is only guidance, the TDSCG was considered previously ineffective as a consultation forum, and is not referred to in the DCO documentation. The ESSP SG also considers there is a lack of proper clarity on exactly what the emergency services will be consulted on; and how the TDSCG — which has in any case been superseded by the ESSP SG - might operate effectively. ESSP SG remains of the view that the Emergency Services should be a named statutory consultee for the detailed design. For issues related to the development of EMP2 and the TMPfC, it is not clear how and by whom "matters related to their functions" will be decided to ensure that the ESSP SG will be	EMP3: During the final stages of the construction phase, the Contractors will each prepare an EMP3 with engagement with relevant stakeholders (on matters relevant to their respective functions only) as listed in Table 2.1 in the CoCP, and subject to agreement by National HighwaysThe Applicant. The Traffic Management Plan for Construction. The emergency services are not, on the face of the draft DCO, consultees on the requirements addressing the following: The detailed design The landscaping scheme The traffic monitoring scheme		

Topic Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
	consulted on the full range of issues set out in its recommendations. [2.1]ESSP SG remains of the view that the Emergency Services should be a named statutory consultee for the traffic monitoring scheme. Unless clear commitments are provided – either in a control document or side agreement - setting out acceptable proposals for how and when the Emergency Services will be consulted the full range of its concerns - it is unlikely this matter will move to 'Agreed' status. [Rec 2.1 point 2]	However, Requirement 14 states: " the undertaker must submit written details of an operational traffic impact monitoring scheme to the SoS following consultation with other bodies identified in Table 2.1 of the outline traffic management plan for construction". Table 2.1 of the outline traffic management plan for construction includes 'Emergency Services'. Consequently, the consultation for the traffic monitoring scheme will be with the emergency services members of the ESSP SG. For detailed design, the consultation with the emergency services will be through the provisions of the Design Manual for Roads and Bridges (DMRB) CD 352 Tunnel Design and Safety Consultation Group (TDSCG) process. For the landscaping scheme, the Project will liaise with the emergency services through the engagement with the Designing Out Crime Officers within the police services		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			For the traffic impact monitoring, the emergency services members of the ESSP SG -will be involved through the Traffic Monitoring Forum (TMF) as set out in Table 2.2 of the outline Traffic Management Plan for Construction (oTMPfC) and their input into the Joint Operations Forum (JOF). All of the Project's proposed temporary and permanent "means of enclosure" accords with the Department for Transport's Volume 1, Series 0300 of the Manual Contract Documents for Highways Works. There is no requirement to consult any third parties.		
			The ESSP SG has requested that this matter be marked as 'Matter Not Agreed', and the Applicant has reflected this in the status column. However, the Applicant believes there is more to discuss and has offered to engage further to help the ESSP SG understand the Requirements in the draft DCO, and to identify the procedures and processes for consultation. The Applicant therefore sees this matter as a Matter Under		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			Discussion and the offer for further engagement remains open. The Applicant will engage further to help the ESSP SG understand the procedures and broad timings of who will be consulted and for what purpose as currently set out in the Application.		
	2.1.1c RRE	In the instance that the draft DCO requires consultation with the emergency services, the 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 SoS. Schedule 2 part 2 of the draft DCO requires consultation with the Emergency Services for some aspects of the scheme, for other aspects - including the detailed design – there is no such pathway to guarantee how and when they will be consulted. Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the emergency services will be consulted and on what details, it is	As per Schedule 2 Part 2 of the draft DCO 'Details of consultation', where an application is made to the SoS which requires the undertaker to consult with a named body (such as the emergency services), the Applicant must give due consideration of any representation made by the body and include with its application to the SoS copies of any representations made together with a written account of how such representations have been taken into account in the submitted application. The Applicant is awaiting confirmation from the ESSP SG on their agreement on this matter engaging with the ESSP SG on this matter to help the group identify gaps between	Draft DCO [Additional Submission AS-038]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		unlikely this matter will move to 'Agreed' status. [Rec 2.1, point 3]	what is secured in the draft DCO and what is not.		
	2.1.1d RRE	The emergency services request 8 weeks in which to provide their views when consulted by the undertaker. The DCO Schedule 2 requirement 20 days it will be 28 days consultation extended to 42 on request "not to be unreasonably withheld" – we seek further clarity on the 42 days extension process. It is possible that this matter could move to "Agreed" status if a commitment is provided to support the Emergency Services in responding to consultations, as requested in connection with matter 2.1.17 of this SoCG.	As per Schedule 2 Part 2 of the draft DCO 'Details of consultation', named stakeholders to the relevant requirements will be provided a 28 days' consultation period with the option to extend this to 42 days where needed as set out in Requirement 20(1)(a) and 20(2) of the Schedule 2 to the draft DCO. The Applicant will discuss this further with ESSP SG.	Draft DCO [Additional Submission AS-038]	Matter Under Discussion
Security during Construction	2.1.2 RRE	 The CoCP should be amended to: Set out a strategy for dealing with security issues Include a security strategy for contractors to follow 	The CoCP has been updated to reflect the recommendations. Section 6.7 of the CoCP refers 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	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		Reference established standards to ensure consistency across all sites. Refer to security issues as part of the work of the JOF Include a requirement for contractors to include security issues in their detailed contractor proposals. The DCO does not include the PSEP and SMP documents referred to or provide for consultation with the Emergency Services on their content. Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status. [Rec 4.2 and Rec 4.3, with cross reference to Rec 4.1]	Execution Plan (PSEP) which will be shared with the Contractors to clearly define the responsibilities and accountabilities of their security to the programme and how it is part of the overall security strategy by the Project. The JOF has been added to the CoCP at Section 4.3.3. This matter remains under discussion as the ESSP SG have requested further clarity on this matter.		
Procedures and requirements for the development of Contractor emergency	2.1.3 RRE	The draft DCO needs to include: Requirements for the minimum content of Contractor emergency preparedness and response plans should be formalised in the DCO to	Section 6.9 of the CoCP addresses the scope and parameters of the Emergency Preparedness Procedures. The emergency procedures will be produced with engagement with	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
preparedness and response plans		 include explicit requirement for approval. Specifically, response plans to deal with fire incidents in the tunnels include Emergency access arrangements from public highway via internal haul roads and risks to workforce and emergency service personnel. Procedures for the approval of such plans following consultation with the emergency services include ensuring internal haul roads used for emergency purposes are fit for purpose There is remaining concern that these issues are not addressed in detail in the CoCP – for instance the need to ensure consultation with ESSP SG members over emergency access arrangements to be used by contractors; and for contractors to produce emergency response plans specifically for dealing with fire in the tunnels. In particular, no specific response has been made to the recommendation for the CoCP to include a minimum contents list for the tunnel plan, as per 10.33 and Appendix F of the ESSP SG 	the emergency services, Kent Resilience Forum and Essex Resilience Forum, and other relevant stakeholders including relevant local highway authorities. National Highways The Applicant will discuss this matter further with ESSP SG to address their concerns about the complexity and lack of clarity on contractor responsibilities.		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		recommendations (Dartford - Thurrock Crossing Emergency Response Plan). Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status. [Rec 5.1, Rec 5.3 and Rec 10.1]			
Removeable barriers	2.1.4 RRE	Removeable barriers around the tunnel should be: • Clearly identified in the DCO Works in Schedule 1 and on approved plans • Justified in terms of their positioning and number, in relation to plans for responding to incidents, with consideration given to providing additional removeable barriers. The ESSP SG cannot identify the removable barriers on the General Arrangement drawings, and draft DCO text makes no reference to removeable barriers. ESSP SG has not to date been consulted on the number and	The tunnel removeable barriers are shown on the General Arrangement Plans and are described in Schedule 1 of the draft DCO in the relevant work numbers (Work No. 3C and 5A). The number and location of the removable barriers have been determined in conjunction with the anticipated operational scenarios and other facilities at the portals e.g., portal road service facilities. The Applicant will engage with the ESSP SG further to clarify the proposals of the removable barriers.	General Arrangement Plans [Application Documents APP-015 to APP-017] Schedule 1 of the draft DCO [Additional Submission AS-038]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		positioning of the removeable barriers. This matter may move to 'Agreed' status if the requested DCO and Plan amendments are made, together with adequate consultation with the Emergency Services [Rec 5.9]			
Emergency area	2.1.5 RRE	Clarification is needed in respect of the new emergency area noted in Work No. 5A (ix) of the draft DCO in Schedule 1 (Works plans 13 and 17), with reference to this Work in other DCO control documents as necessary. The requested clarification has been provided. However: a change to wording for Work No. 5A (ix) of the DCO is needed to refer to 'rendezvous point' the ESSP SG considers the location of the RVPs is unsuitable, and requests further discussion on this matter. [Rec 7.2]	Work No. 5A (ix) is an emergency services Rendezvous Point (RVP). Design Principles S3.20 and S9.21 identify that RVPs will be provided. The Works Plans show the RVPs in the South and North Portals; they are also described in Schedule 1 of the draft DCO. The RVPs are shown in the General Arrangement Plans. The Applicant will engage with ESSP SG to discuss the references of RVPs in the DCO and the suitability of RVP locations.	General Arrangement Plans [Application Documents APP-015 to APP-017] Works Plans [Application Documents APP-018 to APP-023] Schedule 1 of the draft DCO [Additional Submission AS-038] Design Principles [Application Document APP-516]	Agreed-Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status			
Consultation and	Consultation and engagement							
Protest	2.1.6 RRE	National Highways The Applicant should liaise with community and protest groups in advance of construction of the Project, including identification of safe protest areas within the Order Limits if appropriate. Further consideration has led to the conclusion that the identification of protest areas is not required at present but may need review as the Project progresses and as protest response plans are progressed. Essex Police have merged this matter with matter 2.1.17, but there is no difference in the overall approach taken between the ESSP SG and Essex Police. [Rec 3.3]	Provisions for addressing protester actions are in place at Project and National Highways level and the Project will work closely with ESSP SG group members on this as planning is developed. The Contractors are required to develop a SMP, which addresses the key areas around protest. The SMP is informed by the Project's PSEP which has been provided to bidders. The identification and provision of designated protest areas will require further discussion during the detailed design process and development of construction plans. -The provision of safe protest areas will be addressed during this process with the engagement of stakeholders. National Highways The Applicant note that the ESSP SG considers that this issue does not currently need to be addressed.	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Agreed			

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
Protest Plan	2.1.7 RRE	Preparation of a Protest Plan should be considered. The ESSP SG seeks clarification of how National Highways and the main works contractor will engage and consult with its members on the development of the Security Management Plan, and on what the Physical Security Execution Plan contains; and how this will be secured. The ESSP SG has not been consulted on or seen the PSEP, and it is not clear how CoCP at 6.7.5 would secure a commitment from contractors to consult on their SMPs (the arrangements are different from those for EMP2 and Table 2.1). If a clear commitment is provided — either in a control document or side agreement - setting out acceptable proposals for the following, then it is possible this matter could move to "Agreed":	The Contractors are required to develop a SMP, which addresses the key areas around protest. The SMP is informed by the Project's PSEP which has been provided to bidders. The Contractors, on appointment are required to submit their SMP to the Project for approval. The Contractors will be responsible for the implementation of the SMP to include managing protestor incidents. The Contractors will develop the SMP in line with CPNI (now NPSA) guidance and will liaise with the emergency services during the development, as per Section 6.7 of the CoCP. The Contractors will be supported by National Highways and additional resources where required. This is set out in paragraphs 6.7.4 to 6.7.7 of the CoCP.	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Under DiscussionMat ter Not Agreed
		 a) how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status; and b) contractor SMPs should be required to include arrangements for suitable funding to Police Protest Removal Teams to ensure 	The ESSP SG has requested that this matter be marked as 'Matter Not Agreed', and the Applicant has reflected this in the status column. However, the Applicant believes there is more to discuss and has offered to engage further to help		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		availability of staff, transport and equipment to effectively police protest activity. [Rec 3.2]	the ESSP SG understand the Requirements in the draft DCO, and to identify the procedures and processes for consultation. The Applicant therefore sees this matter as a Matter Under Discussion and the offer for further engagement remains open. The Applicant will engage with ESSP SG further to clarify outstanding matters.		
British Automatic Fire Sprinkler Association (BASFA) consultation	2.1.8 RRE	BASFA (as well as the ESSP SG) should be consulted at an early stage in the detailed design of the tunnel and the specification for the Fixed Fire Fighting System (FFFS). Consultation is recommended to begin as soon as possible, and prior to any DCO being granted, so that the views of BASFA can be fully incorporated into the design process from the outset. [Rec_10.6]	The Applicant agrees in principle. The Project will engage with the ESSP SG further regarding the anticipated scope, scale and timing of the consultation with the relevant emergency services and BASFA, where appropriate.	N/A	Matter Under Discussion
Detailed tunnel design consultation	2.1.9 RRE	The detailed tunnel design should be subject to thorough consultation with the emergency services from the outset and not prior to the SoS approval request, possibly identified separately in the DCO application with a dispute mechanism. Previous experience of the TDSCG process is	The DCO application does not provide for consultation with emergency services on detailed tunnel design or provide a dispute mechanism, however, it is a requirement of DMRB CD_352 that emergency services shall be consulted through the TDSCG on		Matter <u>Not</u> <u>Agreed</u>

Topic Item num		National Highways' response	Application Document Reference	Status
	reported by members of the ESSP a being unsatisfactory in addressing their concerns (see also matter 2.2.1 of this SoCG). The ESSP SG maintains its current position on this crucial issue. Unless a clear commitment is provided — either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted on the detailed design of the tunnel, it is unlikely this matter will move to 'Agreed' status. unless and until further information in provided in relation to how this consultation process will work in practice. [Rec_10.7]	detailed design. The TDSCG has been used on numerous road tunnel projects over many years. The Applicant is confident that the TDSCG is the correct forum for future design consultation and is committed to working closely with the emergency services to ensure that the TDSCG works in a format that delivers value for all parties. The ESSP SG has requested that this matter be marked as 'Matter		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			consultation process will work in practice.		
Traffic Management Plans and Traffic Management Forum	2.1.10 RRE	 ESSP SG welcomes the commitments to: Produce Traffic Management Plans in consultation with the Emergency Services, and Create a Traffic Management Forum. However, it is recommended that National Highways The Applicant provide clarification and commitments in the submission documents on: How and when consultation on Traffic Management Plans will take place How the commitment to create the Traffic Management Forum is secured, its composition, terms of reference and powers [Rec 8.4 and Rec 8.5] 	The emergency services are listed as consultees for the TMPs in Table 2.1 of the Outline Traffic Management Plan for Construction (oTMPfC). The Project has added the emergency services members of the ESSP SG to the list of attendees to the Traffic Management Forum (TMF). The level of attendance and representative will be agreed with relevant services. The oTMPfC is a control document as set out in Article 62, Schedule 16 and is one of the documents required to be certified. The Applicant will discuss ESSP SG's further recommendations with them due course.	oTMPfC [Application Document APP-547]	Matter Under Discussion
Design – Road, Tur	nels, Utilit	ies		,	
Designing for Safety and Security	2.1.11 RRE	The security issues identified by ESSP SG should be addressed in detailed proposals for both the construction phase (including enabling works) and the detailed design of the Project, including the measures and	As set out in the DMRB CD 352, the emergency services will be consulted on security issues for the operational phase. For the construction phase, the Project will seek to rely on the	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		recommendations set out in Recommendations 4.2 and 4.10 being referenced in approved plans and/or control documents. The ESSP SG remains concerned at the proposal to use the TDSCG as the mechanism for consultation with the group during the design phase, as per matter 2.1.1 of this SoCG. Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted and on what details, it is unlikely this matter will move to 'Agreed' status. [Rec 4.4 and Rec 4.5 and Appendix B]	CPNI (now NPSA) provisions as set out in the CoCP. The Applicant will discuss this matter further with the ESSP SG.		
Provision for helicopter landing	2.1.12 RRE	The Project should provide helicopter landing points at appropriate locations for use during the construction phase and tunnel portals during the operational phase. These should be referenced in the drawings or other control documents. It is recommended that National Highways The Applicant should make it a requirement for contractor emergency preparedness plans to	For the operational phase, the future identification of suitable areas in the vicinity of the tunnel portals for a helicopter landing area has been agreed and will be part of the detailed design process. Design Principles S3.21 and S9.23 require the provision of a helicopter landing site in the vicinity of each tunnel portal for the operational phase.	ES Appendix 2.2: CoCP [Application Document APP-336] Design Principles [Application Document APP-516]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		include a requirement for an emergency helicopter landing area for their part of the construction project. ESSP SG has not been consulted on and agreed the helicopter landing areas, and remains concerned at the proposal to use the TDSCG as the mechanism for consultation with the group during the detailed design phase (as per matter 2.1.1 of this SoCG). Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted	Helicopter landing points are not currently shown on drawings as their locations will be decided during detailed design (in consultation with the emergency services). There will be a helicopter landing facility during construction. The construction sites will be subject to change during different construction phases, but there will always be a helicopter landing area at the North Portal close to hyperbaric facilities. This is set out in the CoCP at paragraph 6.9.5. The road route is predominantly in fields with plenty of open space to land in the event it is needed. This	oTMPfC [Application Document APP-547]	
		on proposals for helicopter landing points, it is unlikely this matter will move to 'Agreed' status.	requires future liaison with emergency services for up-to-date co-ordinates to match progress.		
		It is noted that this matter is agreed in the Essex Police SoCG. [Rec_5.2 and Rec_5.10]	The request for contractor emergency preparedness plans to include a requirement for an emergency helicopter landing area during construction is a matter under discussion.		
Tunnel evacuation assembly areas	2.1.13	Tunnel evacuation assembly areas should be:	The provision of tunnel evacuation assembly points in the vicinity of	Design Principles	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
	RRE	 Clearly identified in the DCO Works in Schedule 1 Included in the list of Works Shown on the Works Plans and General Arrangement drawings RInclude further written details to be required by the Design Principles and include safe access routes for tunnel evacuation. The ESSP SG has concerns related to use of the TDSCG (as per matter 2.1.1 of this SoCG) and the absence of secured commitments to consult regarding the tunnel evacuation areas. Unless such commitments are provided – either in a control document or side agreement - it is unlikely this matter will move to 'Agreed' status. It is noted that this matter is agreed in the Essex Police SoCG. 	the portals has been agreed and will be part of the detailed design process. Design Principles S3.22 and 9.24 require the provision of suitable muster points in the vicinity of each tunnel portal, including safe access routes The emergency services shall be consulted through the TDSCG on their locations as set out in the DMRB CD 352. The Applicant will engage with the ESSP SG further to assist in locating references to the evacuation areas in the DCO documentation.	[Application Document APP-516]	
		[<u>Rec</u> 9.1]			

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
Tunnel cross-passages	2.1.14 RRE	ESSP SG remains concerned that the cross-passages in the tunnel are identified at a spacing of 150m as a starting point, and which could be increased. The Steering Group seeks further discussion and clarity from National Highways The Applicant on the potential impacts on the health and well-being of fire crews (not just risk of fatalities of road users) resulting from the proposed cross-passage spacing. The detailed cross-passage design and spacing must be subject to consultation with the emergency services prior to approval by the SoS, and Design Principles should be amended to have 100m spacing as a starting point. The ESSP SG has concerns related to use of the TDSCG for consultation (as permatter 2.2.1 of this SoCG). The position of Essex Police on this matter has a different focus, and does not represent a departure from the overall approach of the ESSP SG. Unless commitments to address the above concerns are secured – either in a control document or side	Design Principle S6.01 has been included in relation to crosspassage spacing and Requirement 3 of the draft DCO requires that the authorised development is designed and carried out in accordance with the Design Principles document. The location of the tunnel crosspassages is shown in the General Arrangement Plans and the tunnel crosspassages are listed as a subwork in Schedule 1 of the draft DCO. The tunnel crosspassages are also shown in the Tunnel Limits of Deviation Plans. The emergency services shall be consulted through the TDSCG on the detailed design of the crosspassages as set out in the DMRB CD 352. The ESSP SG has requested that this matter be marked as 'Matter Not Agreed', and the Applicant has reflected this in the status column. However, the Applicant believes there is more to discuss and has offered to engage further to help the ESSP SG understand the Requirements in the draft DCO,	Design Principles [Application Document APP-516] General Arrangement Plans [Application Documents APP-015 to APP-017] Schedule 1 of the draft DCO [Additional Submission AS-038] Tunnel Limits of Deviation Plans [Application Document APP-046]	Matter Under DiscussionNot Agreed

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		agreement - it is unlikely this matter will move to 'Agreed' status. [Rec_10.2 and Rec_10.4]	and to identify the procedures and processes for consultation. The Applicant therefore sees this matter as a Matter Under Discussion and the offer for further engagement remains open. The Applicant has requested further meetings with the relevant emergency services to discuss this matter further.		
Fixed Fire Fighting System	2.1.15 RRE	Fixed Fire Fighting System should be an unequivocal commitment in the preliminary design, DCO and control documents, to be approved in detail. This is particularly important if cross passage spacing is increased above 100m. [Rec_10.5]	Design Principle S6.01 has been included which provides 'To support cross-passage spacings 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' and Requirement 3 of the draft DCO requires that the authorised development is designed and carried out in accordance with the design principles document. The Applicant note that ESSP SG is satisfied that the additional Design Principle S6.01 addresses their concerns.	Design Principles [Application Document APP-516] Draft DCO [Additional Submission AS-038]	Matter_Agreed

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status			
Construction	Construction							
Review of the impacts of the Project on the emergency services	2.1.16 RRE	A five-yearly review of the impacts of the Project 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. Any such review should be a commitment secured through the DCO documents, but ESSP SG is not aware of the pathway for any such commitment. [Rec_12.3]	The Applicant will review the impacts of the Project at 1 and 5 years, which is considered 'business as usual' within a Post Opening Project Evaluation ('POPE') review. —The Applicant awaits confirmation from ESSP SG on their position on this matter.will engage further to clarify this matter.	N/A	Matter Under Discussion			
Funding for co- ordination officer, Steering Group member officer time and service staffing and vehicles	2.1.17 RRE	 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. Funding for ESSP Steering Group member officer time to carry out detailed reviews of the documentation coming forward. Funding additional emergency service staffing and vehicles over the construction phase. 	Both the Applicant (i.e. the 'developer') and the majority of the emergency service's funding originates from the same source (central government). Whilst the Project can and will support emergency services in determining operational impacts and service gaps to inform the Department of Transport and Home Office it is not within the remit of The Applicant to reallocate funding from one central government department to another. The Applicant therefore invited emergency services group members to submit an Impact	N/A	Matter Under Discussion			

Planning Inspectorate Scheme Ref: TR010032 Application Document Ref: TR010032/EXAM/5.4.3.5 DATE: July 2023 DEADLINE: 1

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		The ESSP SG welcomes the invitation from National Highways The Applicant to submit a detailed scope and costings for the posts requested (consultation response co-ordinator and ESSP SG member organisations officer time). Such funding should be secured through a side agreement with relevant Emergency Services and safety partners. Essex Police have merged this matter with matter 2.1.6, but there is no difference in the overall approach taken between the ESSP SG and Essex Police. [Rec 2.2]	Assessment Report which details the required funding and justification for further funding. The Applicant has so far received this report from Essex Police and has submitted this to the Department for Transport for their consideration. The Applicant will continue to monitor the progress of this matter.		
Funding for the creation of a Police Traffic Management Officer	2.1.19	Funding should be provided for the creation of a Police Traffic Management Officer, to cover the construction phase and the first five years of operation of the Project. Essex Police consider that the construction programme will place additional demands on its resources,	The Applicant has an obligation under the operating licence (DfT, 2015) to co-operate with the emergency services. In construction of the A122 Lower Thames Crossing, the Applicant	eTMPfC [Application Document APP-547]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		and have submitted a proposal for funding to the Applicant, which should be secured through a side agreement. [Rec. 8.6]	will work with the police, as set out in the OTMPfC. The Applicant will be engaging with the local community in accordance with the requirements set out in the Code of Construction Practice. The Applicant does not consider that the construction programme places additional requirements on the police, though is willing to continue discussions and consider any further statement of need proposed by Essex Police, noting that Kent Police and Metropolitan Police, have both informed the Applicant that they have the in-		
Reimburse local authorities and emergency services	2.1.20 RRE	Response plans and contractual arrangements with the Project operators should include provisions to	house capability to undertake this role and therefore do not require extra funding. The 'Project Operator' is the Applicant and therefore the response in 2.1.17 above regarding funding also applies.	N/A	Matter Under Discussion
	intenance	reimburse local authorities and emergency services for their costs in dealing with major incidents in appropriate circumstances. [9.3]	regarding furiding also applies.		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
Emergency Incident Management/Response Plans	2.1.21 RRE	The draft DCO and application documents should provide a strategy or framework for providing and implementing Emergency Incident Management/Response Plans for the different stages and elements of the Project_during both the construction (including enabling works) and operational phases. Emergency Response/Management Plans should address how prompt access to incidents is achieved. The ESSP SG is not aware of any requirements emergency planning for the enabling works phase. The CoCP at 6.9 suggests that contractors will engage with the Emergency Services regarding emergency preparedness procedures, but provides no secure commitment. for this or detail what that would involve. For the operational phase, the ESSP SG would like to see any learning from the HS2 tunnel fire last May into the Applicant's planning for safety and emergency planning on this project. ESSP SG has concerns (set out at item 2.1.1 of this SoCG) regarding the proposed use of the TDSCG; and in	The Applicant agrees that Emergency Incident Response Plans need to be prepared for all phase of the project and the emergency services should be consulted on this. For the construction phase, the EMP2 will require Contractors to ensure that emergency preparedness procedures for each worksite are developed. The procedures will be standardised as far as practical across the various worksites and will be appropriate to the anticipated hazards and specific layouts and the local road network. For the operational phase, it is a requirement of DMRB CD_352 that emergency services shall be consulted through the TDSCG on such issues of emergency response and evacuation, including formation of the Emergency Response Plans. The Applicant has consulted with the emergency services in relation to incident access and response times through the Project route and where appropriate and following this consultation, the Project has	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		any case such consultation is not secured in the DCO documents. In the absence of plans to deliver emergency service access to incidents, a hard shoulder should be provided. The Applicant has to date not offered a response to this recommendation. If commitments to address the above concerns (including satisfactory consultation arrangements) are secured – either in a control document or side agreement – it is possible this matter will move to 'Agreed' status. [Rec 2.4 and Rec 5.7]	added access and turnaround points to improve response times, e.g., turnaround facilities at the B186. Emergency Response Plans will be developed for the tunnel, and where applicable national plans/procedures will be used for the open road. Further discussion with ESSP SG will take place to address outstanding issues on this matter.		
Emergency access roads provision	2.1.22 RRE	The arrangements for emergency services to enter the emergency access roads should be designed in accordance with the advice from ESSP SG. This should form part of an approved Emergency Response-/ Management Plan for the Project. All of the emergency access road provisions in the scheme should be consistently referred to in the DCO	The Applicant has shown in the General Arrangement Plans and in the Works Plans the emergency access roads that form part of the Project. These are detailed in Schedule 1 of the draft DCO. The plan and profile for all roads are shown in the Engineering Drawings and Sections.	General Arrangement Plans [Application Documents APP-015 to APP-017] Works Plans [Application Documents	Matter Under Discussion <u>Mat</u> ter Agreed

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		application, and labelled as such on the relevant Works, General Arrangements, Tunnel Area and other approved plans and drawings. The ESSP SG has concerns (set out at item 2.1.1 of this SoCG) regarding the proposed use of the TDSCG as a consultation mechanism for the detailed design of the emergency access roads, which is in any case not secured in the DCO submissions. Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted on detailed proposals for emergency access roads, it is unlikely this matter will move to 'Agreed' status. [Rec 5.5 and Rec 5.6]	Emergency services road provision has been taken into account in the preliminary design produced for the DCO application. The Contractors will further develop this in their detailed design and in accordance with the requirements within the DMRB CD 352 that the TDSCG, which includes the emergency services, will be consulted. This will be incorporated into the Emergency Response/Management Plan when produced during detailed design development. The Applicant will engage with the ESSP SG further to address their outstanding concerns,	APP-018 to APP-023 Engineering Drawings and Sections [Application Documents APP-030 to APP-037 Schedule 1 of the draft DCO [Additional Submission AS-038]	
Emergency preparedness procedures – Communication equipment	2.1.23 RRE	The DCO application documents and emergency preparedness procedures should ensure that communications provisions are compatible with those used across all of the emergency services and address the planned change from Airwave to a new Emergency Services Network, and the continued requirement for the ability to	It is a requirement of DMRB CD 352 that emergency services shall be consulted through the TDSCG on such issues of emergency services telecommunications equipment. The Applicant will continue to liaise with emergency services to ensure communication requirements within the tunnel are	ES Appendix 2.2: CoCP [Application Document APP-336]	Matter AgreedUnder Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		use the mobile phone network along the entire route and in the tunnel in terms of mast protection and secure protection, cabling, RVPs and emergency service hubs. It is noted, that Essex Police have agreed this matter with the Applicant and this is reflected in the Essex Police SoCG. The ESSP SG has concerns (set out at item 2.1.1 of this SoCG) regarding the proposed use of the TDSCG as a consultation mechanism for the detailed design of the emergency services telecommunications equipment. If a clear commitment is provided — either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted on matter, it is likely this matter will move to 'Agreed' status. [Rec 5.4 and Rec 12.1]	compatible with the changing technology throughout the length of the Project, both during construction and operation. The CoCP states that emergency radio channels are to be reserved and compatible with those used by emergency services. The Applicant will engage further on this matter to clarify the continued requirement for mobile phone network along the entire route and tunnel.		
Tunnel emergency access roadways	2.1.24 RRE	The width of the tunnel emergency access roadways should be assessed in terms of their adequacy to accommodate the movement and	The current design of the emergency access roadways facilitates two-way traffic.		Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		passage of emergency vehicles (including a review of appliance turning circles)- without conflict with members of the public evacuating the tunnel. The DCO submissions do not secure satisfactory consultation with the Emergency Services on this matter. [Rec 5.8]	Design Principles S3.22 and 9.24 require safe access routes to be provided to the tunnel evacuation muster points. The detailed design will identify whether there are any specific areas where there is a potential conflict between emergency vehicles and pedestrians. If required, further suitable mitigation measures will be implemented through this design process. The Applicant will engage further on the matter to provide further clarification as requested by the ESSP SG.		
Emergency Services RVP	2.1.25 RRE	The Project should identify and ensure suitable land for RVPs, and ensure that they are sited in appropriate locations in the vicinity of tunnel portals and elsewhere on the route (to be reviewed and then included on Emergency Response Plans) and of an appropriate size for their intended function; these should be identified in the control documents. The location must account for road links, availability of land, integration with emergency access routes and emergency hubs.	The Applicant has identified potential RVP locations in consultation with the emergency services. The proposed RVP locations at both the North and South Portals have been discussed with the ESSP SG. The RVPs are shown in the General Arrangement Plans and in the Works Plans. These are also described in Schedule 1 of the draft DCO. Design Principles S3.20 and S9.21 identify that emergency services	General Arrangement Plans [Application Documents APP-015 to APP-017] Works Plans [Application Documents APP-018 to APP-023] Schedule 1 of the draft DCO	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		Whilst ESSP SG welcomes additions to the submission documents, including commitments in the Design Principle, remaining concerns includeare; • the proposed location of the RVP on the north side; • the lack of rationale for a smaller South Portal RVP; and • no mention in the documents of provisions for additional/alternative RVP locations. Acceptable consultation arrangements with the Emergency Services will need to be secured in the control documents or a side agreement.; [Rec 6.1, Rec 6.2, Rec 6.3 and Rec 6.4]	RVPs will be provided. The northern RVP is approximately 110mx50m and the southern RVP is approximately 50mx30m. The Project believes that the RVPs are adequate to accommodate the numbers of anticipated vehicles requested by the ESSP SG. The size of the RVPs has been developed based on the local constraints, with the total RVP capacity similar to the Stansted Airport example provided by ESSP SG. The Applicant will discuss outstanding matters with ESSP SG.	[Additional Submission AS-038] Design Principles [Application Document APP-516]	
Emergency Hubs	2.1.26 RRE	The Project design should provide Emergency Hubs at the tunnel portals, integrated with RVPs and Forward Control Points, with consequent changes to the list of authorised Works in Schedule 1 (and corresponding Works Plans) and the General Arrangement drawings if appropriate. Details of the Emergency Hubs should be the subject of	The tunnel service buildings at both portals have been designed to provide emergency hub facilities including welfare, communications, and control capabilities for foreseeable operational scenarios. The internal arrangements of the emergency hubs buildings will form part of the detailed design and will be subject to liaison between the		Matter Under Discussion

tem lumber	ESSP SG comment	National Highways' response	Application Document Reference	Status
	consultation with the emergency services prior to submission to the SoS for their approval. The ESSP SG: a) has not been consulted on the preliminary design of the tunnel service buildings "to provide emergency hub facilities". b) considers that the location of the north portal emergency hub is unsuitable. c) has concerns (set out at item 2.1.1 of this SoCG) regarding the proposed use of the TDSCG as a consultation mechanism for the detailed design of the emergency hubs, which is in any case not secured in the DCO submissions. Unless revisions are made for the north hub proposals; and a clear commitment provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted on detailed proposals for emergency hubs, it is unlikely this matter will move to 'Agreed' status.	Project and emergency services. The emergency services shall be consulted through the TDSCG on the layout of the tunnel service buildings and access routes as set out in the DMRB CD 352. The Applicant recognise that further engagement is required to discuss The Applicant's proposal of the emergency hub facilities. The Applicant also recognises that ESSP SG want the provision of emergency hub facilities to be referenced or secured in the scheme documents. This matter remains under discussion.		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
Impacts on safety partners, emergency services and response times		[Rec 7.1] A review should be undertaken of the impacts of the Project on emergency services and their response times. This review should also identify mitigation measures, and commitments in the proposals and control documents. The ESSP SG welcomes the progress on assessing impacts on response times, and looks forward to scrutinising the Applicant's modelling outputs and assessments in due course. Local highway authorities may be asked to comment on the appropriateness and technical adequacy of the modelling. [Rec 2.3, Rec 8.1 and Rec 8.2]	The Applicant has consulted with the emergency services in relation to incident access and response times through the Project route and where appropriate, and following this consultation, the Project has added access and turnaround points to improve response times, e.g. turnaround facilities at the B186. The Applicant has identified and shared methodologies for assessment of the impacts on wider response times. In addition, the Applicant has completed traffic modelling of effects on response times during the operational phase and have shared the output of this with each of -the emergency services.	Document	Matter Under Discussion
			Traffic modelling for construction is also taking place, with mapping completed for three (of six) services, however, data to input into the methodology is required from the remaining emergency services to produce the output.		

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			The Applicant is awaiting feedback from the emergency services on the information provided to them so far.		
Mitigation measures	2.1.28 RRE	Mitigation measures should be proposed where necessary to ensure that emergency service responses do not deteriorate as a result of the Project.	The Applicant has identified and shared methodologies for assessment of the impacts on wider response times. Modelling work is currently taking place which will feed into impact assessment work. This work is ongoing. The Contractors will produce an Occupational Health & Wellbeing (OHW) plan as part of their undertaking. The REAC states that the Contractor will provide an appropriate range of medical and occupational healthcare services (including on-site facilities) to meet the physical and mental health needs of the construction workforce. The range of services will be agreed with National Highways The Applicant, following engagement with Integrated Care Partnerships	Register of Env Actions and Commitments Environmental Statement - Appendix 2.2 - Code of Construction Practice Document [APP-336]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			The contractors will undertake their own risk-based assessment during the mobilisation and finalise their provision within the OHW pPlan. The emergency services will be consulted during this stage. The Applicant requires further clarification from ESSP SG on this matter and discussions will continue between the parties.		
Emergency Response/ Incident Management Plan	2.1.29 RRE	The tunnel Emergency Response/ Incident Management Plan must include an evacuation section, providing for the welfare of members of the public in a range of eventualities (long term and short term) showing how road users will be re-united with their vehicles and the means of transport away from the tunnels. The ESSP SG maintains its current position that the tunnel response proposals should be a clear requirement of the scheme, and developed alongside the detailed design. The Applicant has not discussed the ESSP SG Recommendations on this matter. The ESSP SG has concerns (set out at item 2.1.1 of this SoCG) regarding	As per standard practice, the Applicant will develop a multiagency Emergency Response Plan alongside the detailed design and construction ready for testing and implementation prior to opening. It is a requirement of DMRB CD352 that emergency services shall be consulted through the TDSCG on such issues of emergency response planning, including evacuation. The Applicant will provide safe evacuation routes from the tunnel. Provision of welfare for the public during either short- or long-term incidents would require a multiagency response. This should be delivered as part of the statutory		Matter Under DiscussionNot Agreed

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		the proposed use of the TDSCG as a consultation mechanism for tunnel evacuation planning. Unless a clear commitment is provided – either in a control document or side agreement - setting out acceptable proposals for how and when the ESSP SG will be consulted on detailed proposals for tunnel emergency evacuation, it is unlikely this matter will move to 'Agreed' status. [Rec 9.2 and Rec 10.8]	roles of the relevant emergency services and local authorities as part of their emergency planning function. The ESSP SG has requested that this matter be marked as 'Matter Not Agreed', and the Applicant has reflected this in the status column. However, the Applicant believes there is more to discuss and has offered to engage further to help the ESSP SG understand the Requirements in the draft DCO, and to identify the procedures and processes for consultation. The Applicant therefore sees this matter as a Matter Under Discussion and the offer for further engagement remains open. Further discussion with ESSP SG will take place to address outstanding issues on this matter.		
Operational Risk Assessment	2.1.30 RRE	The ESSP SG seeks clarification on how the Lower Thames Crossing tunnels can be distinguished in safety and risk terms from the existing Dartford Crossing, where both tunnel bores are closed simultaneously from time to time. National Highways should The Applicant consider revising the Operational Risk Assessment to	Clarification was sought from the ESSP SG as to the intended scope of this comment. In relation to the concern of there being simultaneous fires in both tunnel bores, this was considered by the Project Applicant and the assessment found that this is a remote probability and	N/A	Matter Under Discussion

Planning Inspectorate Scheme Ref: TR010032
Application Document Ref: TR010032/EXAM/5.4.3.5
DATE: July 2023
DEADLINE: 1

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		address a scenario where both tunnel bores are closed at the same time. The ESSP SG seeks clarification on how the Lower Thames Crossing tunnels can be distinguished in safety and risk terms from the existing Dartford Crossing, where both tunnel bores are closed simultaneously from time to time. [Rec_10.3]	consequently any mitigation would be disproportionate. The Applicant will discuss this matter further with ESSP SG to try to address their concerns.elaborate on the rationale for this decision and address any outstanding concerns.		
Cumulative effects with other developments	2.1.31 RRE	A clear statement should be made regarding which major developments have been taken into account when assessing the effects of the Project through the construction and operational phases. The ESSP SG will confirm to National Highways before end May 2023is considering if it has any remaining concerns regarding the list of developments considered. The group supports Essex Police's request that any such assessments are undertaken on an iterative basis so that, for instance, additional developments which come forward can be considered and their impacts tested in conjunction with the LTC [12.2]	The likelihood of significant effects as a consequence of the Project and 'other developments' within the study area has been considered within the inter_project effects assessment. The assessment identified 209 other developments that have the potential for moderate adverse (or above) inter-project effects when combined with the Project. An assessment was then undertaken of the effects on the receptors relevant to each topic in order to identify the likely significance of the effects, should all developments be progressed. These inter-project effects are summarised in Chapter 16 of the Environmental Statement. Mitigation measures proposed in the relevant topic	Combined Modelling and Appraisal Report Appendix C – Transport Forecasting Package [Application Document APP-522] ES Chapter 16: Cumulative Effects Assessment [Application Document APP-154]	Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			chapters would minimise cumulative impacts as far as practicable and therefore no additional mitigation has been proposed. No monitoring in addition to that already proposed within the relevant topic chapters has been identified.		
			An Uncertainty Log-will forms part of the suite of the DCO application documents. The Uncertainty Log will identifiesy what other major developments have been included in the traffic model and cumulative assessments.		
			The Applicant is awaiting response from ESSP SG on this matter.will discuss this matter in further detail with the ESSP SG.		
Population and hur	nan health				
Modern slavery, human trafficking and other hidden vulnerability and	2.1.32 RRE	The Project should consider the risk of modern slavery, human trafficking and other hidden vulnerabilities and harm exploiting the new route, and in the	The Applicant is committed to prevent all forms of modern slavery in party of their business and supply chain.		Matter Under Discussion
Planning Inspectorate Scheme R		location and detailed design of the worker accommodation proposals.	The Applicant will follow best practice guidance and legislation to ensure all its works, including the location and detailed design of the worker accommodation prioritise		

Planning Inspectorate Scheme Ref: TR010032 Application Document Ref: TR010032/EXAM/5.4.3.5 DATE: July 2023 DEADLINE: 1

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		The ESSP SG seeks clarification in how National Highways' Anti-slavery and human trafficking statements published on the webon best practice will be translated into actions and controls which deliver through the worker accommodation, the design and construction of the Lower Thames Crossing – i.e. where in the submission documents are these issues addressed measures secured? [Rec 4.6]	the safety and wellbeing of all its workers and communities and does not facilitate any other hidden vulnerabilities and harm. The Applicant agrees to the installation of vehicle detection equipment installation for use by the emergency services as per The Applicant standard practice to, in part, address human trafficking through the tunnel. The Applicant will engage with the ESSP SG further to clarify their outstanding matter.		
Partner of Mates in Mind	2.1.33 RRE	Any contractor engaged by the Project should be required to become a supporter partner of Mates in Mind. This approach should be pursued from the outset. The ESSP SG recommends that the existing REAC commitment PH002 is expanded to cover a) assurances that the Environmental Manager and the QHSSW responsibilities are integrated, and b) this approach covers the enabling works as well as the construction phase itself. The ESSP SG awaits clarification on this point.	The Contractors will provide an appropriate range of medical and occupational healthcare services (including onsite facilities) to meet the physical and mental health needs of the construction workforce. The range of services will be agreed with the Applicant, following engagement with Integrated Care Partnerships. This commitment is set out in in the CoCP, Register of Environmental Actions and Commitments (REAC) reference number PH002. It is envisaged that this will include membership and registration to a scheme such as Mates in Mind.	ES Appendix 2.2: CoCP [Application Document APP-336] Health and Equalities Impact Assessment (HEqIA) [Application Document APP-539] ES Chapter 13: Population and Human Health	Matter Under Discussion

Planning Inspectorate Scheme Ref: TR010032 Application Document Ref: TR010032/EXAM/5.4.3.5 DATE: July 2023 DEADLINE: 1

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
		[Rec_11.2]	The Health and Equalities Impact Assessment (HEqIA) and ES Chapter 13 both include the potential impacts on the mental health and wellbeing of the workforce. Within the latter, there is a specific sub-section around suicide risk and this highlights the various strategies and toolkits which will be used on the Project. The Applicant will engage with the ESSP SG further on their recommendation.	[Application Document APP-151]	
Suicide prevention	2.1.34 RRE	The Project's design principles, and all aspects including detailed design of bridges, landscaping and means of enclosure, etc., should incorporate adequate measures to reduce the risk of suicide during the construction and operational phases. [11.3 and 11.4]	Potential sites have been identified where there may be a suicide risk and mitigation measures will be considered at detailed design and construction planning stages. The focus is on eliminating and mitigating (delay and deter) risk through design, the Applicant Suicide Prevention Strategy and the Suicide Prevention Toolkit which will be used on the Project. The Applicant acknowledge that ESSP SG has welcomed the above statement in their recent feedback on 24th April 2023, and will engage further to clarify the		Matter Under Discussion

Topic	Item number	ESSP SG comment	National Highways' response	Application Document Reference	Status
			stance on securing this issue in the DCO application.		
Workforce health and wellbeing	2.1.35 RRE	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 Project. Any requirements for mitigation should be linked to the CoCP and take account of specified strategies. The HEqIA is not a control document, and it is not clear how the various strategies and toolkits mentioned will translate into commitments. ESSP SG welcomes these developments, and if further comments are required will provide these by end May 2023. [Rec_11.1]	The HEqIA and ES Chapter 13 both include the potential impacts on the mental health and wellbeing of the workforce. Within this, there is a specific sub-section around suicide risk and this highlights the various strategies and toolkits which will be used on the Project. The Applicant is awaiting further comment from ESSP SG on this matter.will engage with the ESSP SG further to address their request for mitigation to be linked to the CoCP and to discuss their comment regarding the HEqIA.	HEqIA [Application Document APP-539] ES Chapter 13: Population and Human Health [Application Document APP-151]	Matter Under Discussion

Appendix A Engagement activity

Table A.1 Engagement activities between the Applicant and ESSP SG

Date	Form of contact/ correspondence	Key topics discussed and key outcomes	
15 January 2018	Meeting	Project introduction, agreement on the terms of reference for TDSCG, and presentation of the plan for subsequent meetings.	
28 March 2018	Meeting	To discuss the methodology for the tunnel operational risk assessment (ORA) and process towards a preliminary design.	
18 September 2018	Meeting	Update on the tunnel design and hazard identification	
14 May 2019	Meeting	Update on Systems Engineering and Cross Passage design	
10 October 2019	Meeting	Further Update on Systems Engineering, FFFS, Cross Passages, Future meetings	
12 December 2019	Meeting	Overview of highway design changes since statutory consultation, fixed firefighting system solutions and desktop response exercises.	
10 March 2020	Meeting	Further discussion on the desktop scenarios and incident response planning	
8 May 2020	Meeting	Project update and incident response planning.	
9 February 2021	Meeting	Project update, Tunnels Operational risk assessment an tunnel design.	
17 June 2021	Meeting	First meeting of the new ESSP SG group to discuss project updates, consultation and TDSCG engagement	
23 July 2021	Email	Email with Met Police to provide update on the project and status of DCO	
2 September 2021	Meeting	Update meeting of the ESSP SG	
23 February 2022	Meeting	Lower Thames Crossing briefing Kent Police on air quality impacts on ecology that could be mitigated by both speed enforcement along the affected road network	
28 March 2022	Meeting	Scoping group to identify need for separate groups for the construction phase.	
5 April 2022	Meeting	Update on modelling undertaken and impact of Project on all emergency services.	
12 July 2022	Meeting	Update meeting with the Emergency Services Representative regarding the project and any outstanding actions from the ESSP SG	

Date	Form of contact/ correspondence	Key topics discussed and key outcomes
18 August 2022	Meeting	Meeting with representative of the emergency services to discuss development of SoCG and sharing with members of ESSPSG.
12 January 2023	Meeting	ESSP SG Meeting with the representative of the emergency services to update on DCO submission, next steps and to request ESSP SG feedback on the current SoCG draft.
20 January 2023	Meeting	ESSP SG Catch-up meeting with ESSP SG Chair regarding engagement with emergency services stakeholders on an individual basis.
09 February 2023	Meeting	Meeting with the representative of the emergency services to request status of SoCG feedback, inform the group about registering as an Interest Party and submission of relevant representations.
16 March 2023	Meeting	Meeting with the representative of the emergency services to request status of SoCG feedback and update on National Highway's response times modelling work.
11 May 2023	Meeting	Meeting with the representative of the emergency services to update on the contents of the Rule 6 letter and The Applicant's intention to progress with police SoCGs as requested by the Examining Authority.
8 June 2023	Meeting	Meeting with the representative of the emergency services to update on SoCG progress in line with the Rule 6 letter instruction and Procedural Decision Notices.

It is noted that catch-up meetings with the ESSP SG's consultant, Browne Jacobson occur on a weekly basis.

Appendix B Glossary

Term	Abbreviation	Explanation
Emergency Services and Safety Partnership Steering Group	ESSP SG	The group of emergency services and Local Councils that formed the regular engagement group
Fixed Fire Fighting System	FFFS	Fixed firefighting systems (FFFS) are an active way of combating fires in tunnels
Tunnel Design and Safety Consultation Group	TDSCG	The initial group of emergency services stakeholders that were engaged with, this group was superseded by the ESSP SG.
British Automatic Fire Sprinkler Association	BASFA	The British Automatic Fire Sprinkler Association is the trade body for the fire sprinkler industry in the United Kingdom
Code of Construction Practice	CoCP	Code of Construction Practice (CoCP) is a written code of standards and procedures that developers and contractors must adhere to.
Design Manual for Roads and Bridges	DMRB	The Design Manual for Roads and Bridges contains information about current standards, advice notes and other published documents relating to the design, assessment and operation of trunk roads, including motorways. The DMRB has been prepared for trunk roads and motorways.
Environmental Management Plan	EMP	For the Project, a plan setting out the conclusions and actions needed to manage environmental effects as defined by the Design Manual for Roads and Bridges standard LA 120. The CoCP is the equivalent of the first iteration of the EMP (EMP1). The Contractor's EMP would be EMP2 and the end of construction EMP would be EMP3.
Joint Operations Forum	JOF	The JOF is an executive level forum made up of National Highways and its Contractors. The Applicant will establish and chair a JOF, attended by senior representatives from the Contractors.
Rendezvous Point	RVP	Used at locations (e.g. stations or airports) that would typically require the attendance of several or more emergency services vehicles and personnel in the event of a significant incident.
Secretary of State	SoS	The Secretary of State has overall responsibility for the policies of the Department for Transport.
Traffic Management Forum	TMF	The TMF would review planned traffic management arrangements and receive

Term	Abbreviation	Explanation
		comments as to their appropriateness. The TMF would also monitor, review, and provide updates to the TMPs when required.
Traffic Management Plan	TMP	A plan setting out the strategy and measures to be adopted with respect to highway and transportation issues for the Project. The TMP supports the DCO application and would be embedded within the eventual construction contractor documentation and will form an overarching and comprehensive management procedure for the Contractor to adhere to.

Appendix C ESSP SG Recommendations

Annex B:

ESSP SG Rendez Vous Point Recommendations

9 March 2022

Lower Thames Crossing (LTC): Rendez Vous Points (RVP)

Emergency Services and Safety Partners (ESSP) Steering Group Recommendations

1. The ESSP Steering Group has considered the issues discussed at the recent meeting about RVPs, and can offer the following points of clarification.

Confidentiality, Safety and Security

2. RVPs for major infrastructure sites such as Stansted are signposted in green, something which has been sought and enhanced following major incident inquiries. This helps emergency service personnel - some of whom may be unfamiliar with the area and possibly travelling to the location from a different region - arrive at the correct location promptly. Therefore there is not perceived to be a need for the RVP locations themselves to remain confidential. At the same time, it would be prudent to retain a degree of confidentiality over the detailed design and construction of each RVP.

Existing RVPs vary widely in terms of their boundary treatments and levels of security for instance the existing Dartford Crossing RVP on the north side of the River Thames is not gated; whereas those at Stansted are fenced, gated, and monitored by airport security staff. The level of security for the Lower Thames Crossing primary RVPs will depend on a range of factors such as location, and the circumstances will be different from those at Dartford. The guiding principle for the LTC is that a security needs assessment should be undertaken for each RVP once the main decisions on location and size have been confirmed.

- 3. It is considered that it will be necessary to agree perimeter treatments; and prepare operational plans for control over access to the RVPs. Risk-commensurate design should be undertaken. Subject to further discussions over detailed design, the ESSP Steering Group anticipates that primary RVPs for the Lower Thames Crossing would as a minimum be fenced and have a locked gate, not least to prevent casual parking up by members of the public. However, this may involve relatively low key fencing and gates (perhaps of an agricultural style), which might assist in limiting their environmental impacts.
- 4. When considering perimeter and security fencing for the RVP it is imperative to consider the three-pronged fundamentals of forced entry protection: Detection, Delay and Response. Any ineffective physical security or late detection could be exploited. Specification for fencing will need to be aligned to the security risk assessment which will assess the key factors and identify any potential breaches or threats. It is imperative that fencing provision is attributed to a security industry standard, and fit for purpose. Determining the security rating of fencing is essential to consider when specifying or installing other perimeter security to meet a specific performance requirement.
- 5. Consideration is required as to access to the RVP, with designs seeking to minimise the number of gates through the perimeter fence but allow appropriate timely access to

- those required. Gate specification must be designed and align with the appropriate risk assessment.
- 6. There is also a need to ensure RVPs are swept for safety and security purposes in advance of use and periodically this goes hand in hand with site maintenance. We would also anticipate this forming part of operational plans for the RVPs, involving close liaison between National Highways and the emergency services, particularly the Police forces.

Locations

a) General Points

- 7. As set out in the ESSP Steering Group's consultation response of 8/9/21, RVPs enable the emergency services and safety partner vehicles and personnel to gather and gain information about an incident, before moving to the scene itself under the direction of the Forward Control Point command.
- 8. Ideally RVPs should be on route to, reasonably close but not immediately at the scene of an incident. For the tunnel portals, a minimum distance of 400m is recommended. This separation can help to avoid:
 - too many vehicles and personnel arriving at the scene, which in turn can present management issues including obstruction of access; and
 - the impacts of other events at the original incident scene for instance the effects of an explosion.
- 9. In the case of the LTC tunnel portals, locating the RVP a suitable distance away might also help to manage evacuation of members of the public and avoid conflicts with emergency service vehicle movements though this is not entirely clear at present.
- 10. At the same time, it is recognised that the tunnels and portals are likely to be a key focus for handling significant emergency incidents; and that RVP provision for the Lower Thames Crossing will need to address this. However, there is some concern at the suggested locations.

b) North of the River Thames

- 11. The ESSP Steering Group appreciates that the emergency access arrangements and layout for the north portal are under review, such that the previous plans for two access roads off Station Road has now changed. It is also appreciated that the revised arrangements are not fully in the public domain, and should be treated as confidential for the time being.
- 12. The suggested plans for the primary RVP near the north portal in the presentation to the last meeting are not to scale, so it is difficult to assess their size and location accurately Nevertheless, the ESSP Steering Group welcomes the design provision for access to and from the RVP from all directions of the LTC; as well as from the local road network at Station Road. This offers flexibility for emergency service vehicles in how they reach the RVP, enabling the services to adapt if there are blockages on the main routes.

- 13. However, it would appear that the proposed RVP would be quite close to the portal, and probably nearer than the preferred lower limit of approximately 400m (see above). In addition, it appears the proposed RVP would be accessed either:
 - (i) from the LTC via an arrangement of emergency slip roads and roundabouts; or
 - (ii) via a single access off Station Road, leading to the western arm of the emergency arrangements.
- 14. In both cases, emergency vehicles would travel onwards for between 500m and 600m along a roadway south from the western roundabout, in order to reach the RVP. Subsequently, when called forward to attend the scene of an incident on the road or in the tunnel, emergency vehicles would have to return back along the roadway to the junction. The ESSP Steering Group has some concern that this arrangement may be unnecessarily complicated, involving a greater number of two-way movements along the emergency service roads than may be ideal.
- 15. For these reasons, the ESSP Steering Group suggests that the location of the RVP is revisited, with a view to positioning it further from the north tunnel portal, and closer to the emergency access junction off the LTC. For instance, perhaps it could be located either in the area marked "C2", or in the area within the western loop of the emergency access arrangements (see areas shown in orange on the attached plan). It is appreciated that future development of a Tilbury access road might require all or part of these areas in the future, but nevertheless they act as a guide to alternatives which the ESSP Steering Group consider would be preferable.
- 16. It is also suggested that the currently suggested RVP location might instead be well suited to forming an evacuation muster point (though the details of this would have to be considered separately).
- 17. The secondary RVP suggested alongside the A13 westbound slip road on to the south bound LTC appears to be a good location which the ESSP Steering Group supports. This support is qualified by the comment that the detailed specifications for this secondary RVP should either be included in the LTC proposals themselves, or be subject to further consultation before implementation. Either way, the detailed specification for the secondary RVP needs to be secured through the DCO provisions, controlled documents and emergency response plans.

c) South of the River Thames

- 18. It is recognised that the situation south of the river is somewhat different to that north of the river. In particular, the south tunnel portal is approximately 2.2km from the A2 where the LTC would terminate; and the route of the LTC skirts the edge of the Gravesend built up area. Also, the southern portal carriageway level is approximately 28m below surrounding ground.
- 19. The suggested primary RVP location would be just south of the A226, adjacent to the tunnel service building. This would be approximately 400m from the south portal. This would provide good access in terms of being close to the local road network, though the ESSP Steering Group is aware of some situations where the A226 can rapidly become heavily congested in the event of a problem on the network in the area.

- 20. The location is perhaps not ideal in terms of its relationship to likely forward control points dealing with incidents in the tunnels the forward control points may well wish to use the Tunnel Service Building adjacent. On the other hand, the distance of the suggested RVP from the tunnel portal and the relative land levels mean that separation from likely incident scenes is acceptable. It remains the case that:
 - the emergency access routes down to the carriageway would have to be designed to ensure that they can accommodate their use by emergency service vehicles - both in terms of capacity and gradient, given the level changes
 - consideration is given to how members of the public can be evacuated from the tunnels (especially given the level changes) whilst also avoiding potential conflicts emergency service activities and their vehicles.
- 21. Location CA1 has also been considered as an RVP, following its suggestion by the ESSP Steering Group as part of its consultation response of 8/9/21. The ESSP Steering Group acknowledges the constraints associated with this site. However, given the potential limitations of the tunnel portal location identified above, it is considered that this site still has potential to offer a useful alternative. Its potential advantages include:
 - the site appears to be in the ownership and control of National Highways already and is being used as such
 - the land is already surfaced to accommodate heavy goods vehicles, as it is understood to have been a lorry park, and currently forms an aggregate storage area hence it should be able to support larger emergency service vehicles
 - it could continue to offer dual use (storage and emergency service RVP) if suitable limitations on day to day use are defined
 - the potential for disturbance to local residents is limited traffic movements to and from the site are already established
 - it may offer a well located alternative RVP in the event that the tunnel portal area is difficult to reach the site has access to Valley Drive, which may assist if traffic backs up on both the A2 and the A226.
- 22. Therefore south of the River Thames, the ESSP Steering Group suggest that both of these sites might be promoted in tandem.

d) Additional RVPs

23. If suitable primary and secondary RVPs are identified and provided as discussed above, the ESSP Steering Group considers that there would not be a need to identify additional RVPs to serve the remainder of the LTC between the M25 and the junction with the A13. Notwithstanding this, emergency and operational plans should be developed which consider the best ways to accommodate emergency personnel and vehicles in the event of an incident on this stretch of the LTC - including the potential need to provide "ad hoc" RVPs.

Buildings and facilities for RVP control

- 24. Some form of building which could be used, for instance, to register emergency service vehicles and personnel arriving at an RVP would be helpful. It is, however, recognised that some of the potential locations may be sensitive in environmental and planning terms (for instance potential secondary RVP site CA2 is within the Green Belt). Similar considerations may apply to the construction of emergency access roads. Security specification for any physical structure (such as doors, seals, supporting frame and structure) must be in line with the appropriate risk assessment and ensure that they mitigate against crime, harm, and threat.
- 25. It is imperative that sufficient Police airwaves signal is achievable across all areas inclusive of RVP's, with the expectation that any subsidiary equipment is funded. It is strongly recommended that an airwaves mast / communication survey be carried out to understand what the constraints of the RVP sites might be.
- 26. RVP infrastructure may also require the installation of a power source and core cabling within the primary RVPs for access to national grid or local third-party electrical supplies. Technical specification will be required for the appropriate secure storage of portable generators, this will be informed by the level of appropriate and timely access. This is particularly important where a major incident may last for several days. RVP security considerations must be applied to the design and layout, as core cabling can be susceptible to vandalism; and if not appropriately lit may present significant slip, trip, and fall hazards. This will require detailed specification by the appropriate technical body/lead.
- 27. The same due diligence is required for all wi-fi devices to ensure wireless connectivity within the RVP.

Lighting

- 28. It is also suggested that provision needs to be made for lighting, which is an important requirement for the emergency services attending an RVP. The bare minimum criteria is to ensure that there is sufficient lighting to ensure safe movement around the site. However, it is recommended that perimeter lighting should be used to create a uniform and well-lit strip around a site, illuminating not just the boundary fence itself, but also both the inner (secure) and outer (insecure) sides. Lighting design must reflect Visual Recording System (CCTV) specifications. Due to the significance of lighting, a defined Lighting Impact Assessment (LIA) and risk assessment will be necessary to determine required uniformity, specification and standards required for the RVP's.
- 29. The detailed specification for lighting should be developed using a risk-commensurate approach, and may range from fixed structures to lightweight and portable lighting. Fixed lighting columns must not be an aid to climbing; and portable lighting may need a facility for storage. Any temporary lighting will need to be designed by competent lighting professionals and in compliance with appropriate guidance.

Access, Size and Capacity

30. It is assumed that access and egress arrangements for the RVPs will take into account the turning requirements for the largest vehicles used by the emergency services. In terms of size of the primary RVPs, the ESSP Steering Group consider that there is a

- need to accommodate at least 10 vehicles for each of the main emergency services (police, fire and ambulance). If more vehicles are needed for major incidents, these could probably be held in reserve elsewhere.
- 31. The Stansted RVPs are roughly 80m x 100m in area, which provides sufficient capacity for parking and turning. The ESSP Steering Group looks forward to seeing further detail of what is proposed.

Ground Conditions and Surfacing

- 32. The primary requirements for RVP ground conditions are that a surface with sufficient load bearing capacity to accommodate large vehicles is needed; and one which is not prone to waterlogging or flooding.
- 33. The ESSP Steering Group would be happy to discuss alternative surfaces to bound asphalt or concrete which might present a more sustainable solution. These could include Grasscrete-type materials. Although the ability to mark out parking spaces is desirable, this is not a primary requirement. Provision and marking out should also recognise the range of vehicle sizes which may be involved.

Management and Maintenance

34. Provision should be made for ensuring that the RVPs are appropriately maintained and managed when not in use, and kept clear and available when needed. These proposals will need to balance the functional and security requirements identified above with other issues such as environmentally sensitive management. There is potential to integrate the emergency service needs of the RVPs with environmental gains, for instance in relation to biodiversity.

Securing RVPs

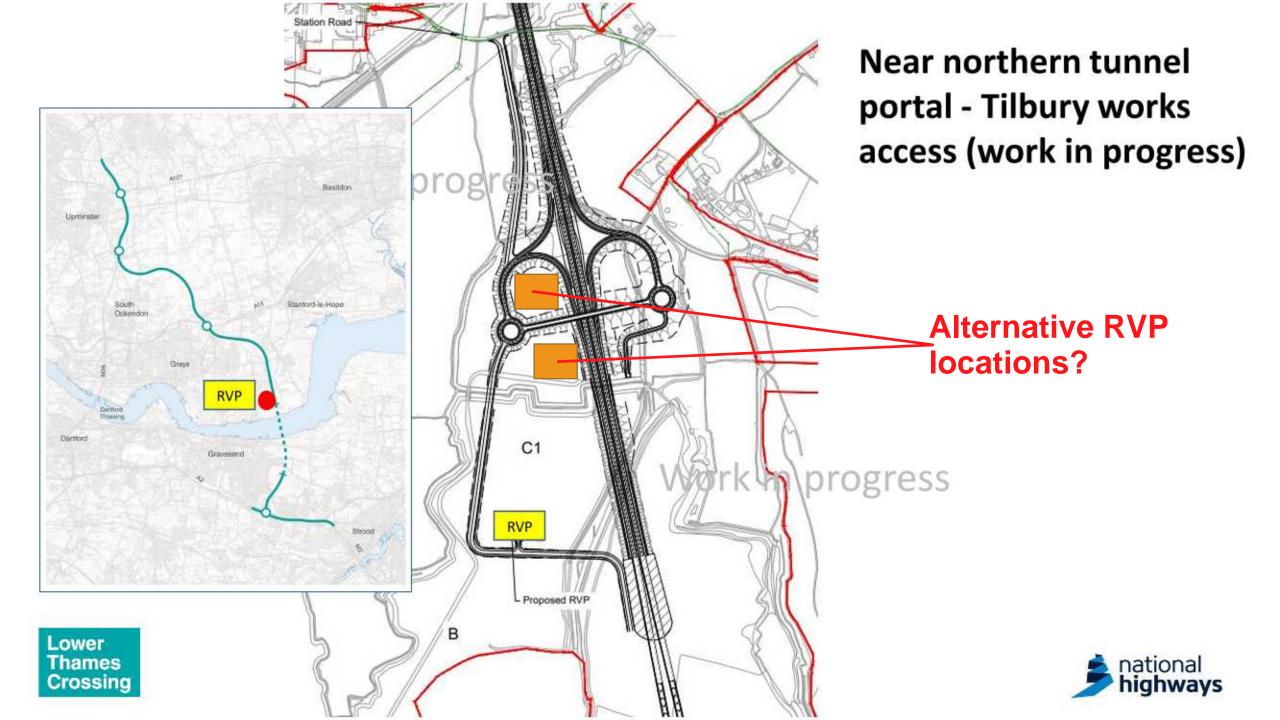
35. As indicated in the ESSP Steering Group consultation response of 8/9/21, it is important that the DCO proposals include mechanisms for the detailed design, provision and future maintenance of RVPs. This may include showing the RVPs on relevant drawings and detailing them in controlled documents; securing necessary land is included within the scheme; making provision for further consultation with the emergency services over detailed design; and funding for management.

Site visit

36. As mentioned at the last meeting, if National Highways would like to visit the Stansted RVPs this can be arranged.

Browne Jacobson LLP, on behalf of the Emergency Services and Safety Partners (ESSP) Steering Group

9th March 2022



Your Ref:

Our Ref: BHUN02/137642.00001

Direct Dial: 0330 045 2817

E-Mail: ben.hunt@brownejacobson.com

Mowbray House Castle Meadow Road Nottingham NG2 1BJ t 0115 976 6000 f 0115 947 5246 www.brownejacobson.com DX 718130 Nottingham 27



Josh Van Haaren National Highways Lower Thames Crossing c/o Traverse Ltd

By email only LTC.CONSULTATION@TRAVERSE.LTD

20 June 2022

Dear Josh

Lower Thames Crossing: Local Refinements Consultation

Comments on behalf of the Emergency Services and Safety Partners Steering Group

1. Background

- 1.1 I am writing on behalf of the ESSP Steering Group in response to the current Local Refinements consultation. This follows on from the Steering Group's response dated 8th September 2021 to the Community Impacts consultation (copy attached for ease of reference). The response of 8/9/21 included a total of 56 Recommendations. The first six Recommendations (2.1 2.6) were under the heading of General Points, and the remaining Recommendations were in relation to ten topic headings.
- 1.2 On 12th November 2021 National Highways made an initial summary response to each of the Recommendations with a Red/Amber/Green coding. At first it was stated that National Highways would make a more detailed response; and although this did not take place, it was subsequently agreed that the setting up of the following three Scoping Groups was agreed as a suitable way forward to capture the range of issues which had been raised:
 - Scoping Group A Response Times
 - Scoping Group B Tunnel and Road Design
 - Scoping Group C Safety and Security
- 1.3 In parallel, I have been meeting with Fortune to discuss what might be contained in a possible Statement of Common Ground.

Birmingham Exeter London Manchester Nottingham





Browne Jacobson LLP is a limited liability partnership, registered in England and Wales, registered number OC306448, registered office Mowbray House, Castle Meadow Road, Nottingham, NG2 1BJ. Authorised and regulated by the Solicitors Regulation Authority (SRA ID 401163). A list of members' names is available for inspection at the above office. The members are solicitors, barristers or registered foreign lawyers.

2. Progress

- 2.1 The main areas of progress are as follows:
 - (i) <u>For Scoping Group A Response Times</u>, a meeting was held on 5th April 2022. Regards the action points arising, we appreciate that National Highways cannot run the required modelling until Steering Group members have supplied some parameter information. This information is beginning to come forward, and we would hope to provide it for the model shortly.
 - (ii) For Scoping Group B Tunnel and Road Design, a meeting was held on 28th March 2022. The majority of the action points currently sit with National Highways.
 - (iii) For Rendez-Vous Points, a specific meeting was held on 13th January 2022, following which we submitted recommendations dated 9th March 2022, and made an open offer to visit similar facilities at Stanstead Airport if that would assist National Highways in their design.
 - (iv) For Scoping Group C Safety and Security, following some postponements, a meeting was held on 16th June 2022. The majority of the action points sit with National Highways. This includes making progress with the separate Risk and Security Working Group.
 - (v) Work has begun on a draft Statement of Common Ground, and is on-going.
 - (vi) In addition, Steering Group members have begun work to assess some of the impacts of the LTC on the Emergency Services' operations, with an emphasis on the construction phase. This may lead to a request for contributions to mitigate any impacts identified.

3. Comments

- 3.1 Despite the summary above, there is significant disappointment among the Emergency Services and Safety Partners Steering Group members that there is little tangible evidence of significant progress with the Recommendations from the 8/9/21 Community Impacts Consultation. With submission of the DCO expected in the latter part of this year, but substantially prior to the Christmas and New Year break, this is concerning.
- There may be some Recommendations which have already been acted on by National Highways, for instance through changes to the draft DCO, plans and control documents; or through formalising measures outside the DCO (for instance developing LTC-specific intelligence plans). However, we have not been provided with sight of these or a clear explanation of National Highways' current position.
- 3.3 Specifically, the Local Refinements Consultation documents do not appear to include any changes relating to the Recommendations. This is highlighted by the Annex to this letter containing comments on the Local Refinements Consultation from Essex Police Designing Out Crime Officers. You will see that the issues raised in the Annex are generic rather than specific to the current round of consultation; and that they summarise some of the main points highlighted in the DOCO response to the Community Impacts Consultation 2021, which was included as Appendix B to the Steering Group's response of 8th September 2021.
- 3.4 We appreciate that there are some areas for which the ESSP members need to provide additional information. But in the main we feel the actions currently sit with National Highways. The Steering Group will not be in a position to agree most of the issues in the draft Statement of

Common Ground and offer a significant degree of support for the proposals unless and until these Recommendations have been addressed.

3.5 Nevertheless, we hope to continue to work with you to progress with all of the lines of work identified in (i) - (vi) of section 2 above.

Yours sincerely

Ben Hunt

For and on behalf of Browne Jacobson LLP

ANNEX:

LTC: Designing out Crime Security Considerations

Main observations and request within the DCO

Mitigation of crime and risk management: Necessity for site specific assessments (such as risk and security), and predetermined parameters and consistent terminology across all components of the design. These processes will require ongoing review at various stages of the scheme, such as the pre-enabling work, construction process, and tunnel operation.

Acknowledgement in principle is required by National Highways to commit to the prioritisation of reducing crime and the fear of crime as a key development principle and material consideration, and to foster the incorporation of relevant policies within their strategic documentation. Embedding and encapsulating this concept of 'safety and security' throughout all Strategic documentation and proposals will ensure the longevity of the project and achieve sustainability aims.

Use of Industry Approved Standards: Application of the relevant standard and level will be determined by the appropriate risk assessment and commensurate to the crime pattern analysis. Additional or alternative security standards may be stipulated for specific crime risks.

The DOCO would insist on utilising applicable security standards across all components of the proposal wherever appropriate. We would welcome the inclusion that the proposal aligns itself to 'Secured by Design' (SBD) Principles and where appropriate accreditation such as worker accommodation.

Public Realm Spaces: It is important to ensure the design of all public realm spaces balance appropriate levels of connectivity with permeability, and do not encourage crime and Anti-Social Behaviour (ASB). The DOCO would encourage discussions to ensure appropriate alignment to the wider connectivity and desired public realm across the scheme, ensuring these spaces are designed for a safer future. It is important to ensure that the design is such, that any public realm space does not become a central point for ASB or any unwanted activity, thus having an adverse impact on surrounding communities.

Ongoing Liaison: We would require ongoing liaison (across the project) regarding various components of the detailed design such as, (please note that this list is not exhaustive):

• **Lighting**: At the appropriate time within the process, the DOCO would request discussions (throughout the life span of the design) and clarity regarding proposed lighting uniformity and standards, evidenced within a detailed Lighting Impact Assessment (LIA). For clarity, the DOCO will not be responsible for signing off lighting schedules and proposals.

- **CCTV:** The DOCO will require a generic statement of the requirements and specification via an Operation Requirement Table and User Requirement table. This will be site and location specific. As per lighting, the final sign-off for CCTV installations will not be the responsibility of the DOCO, however, will require review.
- **Compound Security:** Due to the vast number of permanent and temporary site compounds, ensuring the design and security of these locations will be imperative, due to the potential risk of these sites become subject to criminality and ASB.
- Worker Accommodation: As proposed within early consultation proposals, the worker accommodation will need to be sensitively designed to ensure that any provisions do not generate crime and ASB. Recommendations would include the completion of a 'Health Impact Assessment' to ensure the welfare and security of all staff is considered, this will include the necessity for secure infrastructure, such as secure bicycle storage and facilities. Where applicable the DOCO would request that new facilities achieve the relevant Secured by Design accreditation, utilising Police Preferred Scheme whilst applying the necessary industry approved security standard.
- Management and Maintenance Plans and Policies: Appropriate policy plans will be required to embed the management and maintenance schemes, of both the construction sites and upon tunnel completion.
- Access Control: Observations and reservations regarding access to site compounds, worker accommodation, Public Rights of Way, RVP's and proposed emergency access only roads.
- **Boundary delineation:** This is a fundamental component of addressing site security especially within site compounds, as it will a) provides the initial guard against intruders, b) acts as a significant deterrent, and c) restrict access by climbing whilst utilising integrated access control.

Governance: It is important to address that the time required to scrutinise the relevant documents will incur a significant demand on the DOCO. This will fall outside of what is deemed as business as usual. Discussions will be required to obtain additional funding or a dedicated post to exam the documentation. A clear structure is required to detail the expectations of all parties and reality of the deliverables from the DOCO.

If funding is successful, the Essex DOCO will be able to provide the specialist advice and guidance regarding the built environment at every stage of architectural design to the full development control process to minimise crime, disorder and ASB. This will deliver significant crime reductions and cost efficiencies savings for National Highways and calls for service.