

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

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

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

Written Representation –

SUMMARY

Introduction

1. Members of the Emergency Services and Safety Partners Steering Group (ESSP SG) have sought to engage with the Applicant for the Lower Thames Crossing Development Consent Order over the last few years. The ESSP SG considers that it has an important role in ensuring that the LTC, if granted DCO, will be a safe and secure transport development which does not have an adverse impact or place unacceptable burdens on the ability of its members to deliver their important services. In September 2021 the ESSP SG provided 56 Recommendations to the Applicant on how the project could be developed.
2. However, progress as a result of those engagements has been slow, and there are a number of areas of Key Concern which are submitted to the Examining Authority at in this Written Representation submitted to the Examining Authority at Examination Deadline 1. The ESSP SG has already submitted Relevant Representations; but to date these Key Concerns have not been resolved through the draft Statement of Common Ground between the ESSP SG and the Applicant, and which will also be submitted at ED1.

Key Concerns

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

3. The ESSP SG has recommended that the Emergency Services are made a statutory consultee, and is not satisfied that the Applicant has secured adequate provisions for consultation in the scheme submissions. This concern runs through many of the ESSP SG's other, topic-based objections to the DCO as submitted.
4. The Applicant proposes to consult on the detailed design and some other matters via the Tunnel Design and Safety Consultation Group (TDSCG) model in DMRB CD325. The ESSP SG members' previous experience of the TDSCG was that it did not address their concerns; and in any case the submitted documents do not secure consultation with the TDSCG.
5. Provisions for consultation with the ESSP SG on other topics - including contractor security and emergency preparedness plans during the construction phase, remain in many cases uncertain or unsecured.
6. The ESSP SG has asked the Applicant to prepare a "road map" for consultation, which it is hoped may shed further light on the issue; perhaps lead to changes to the submissions, a greater degree of agreement between the parties; and perhaps contribute to a control document or side agreement to secure acceptable consultation arrangements.

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

7. RVPs are now shown on the submitted scheme drawings (including General Arrangement Plans [APP-016](#)) and required by the Design Principles S3.20 and S9.21 ([APP-516](#)). However, the ESSP SG is concerned that despite previous advice to the Applicant, a number of matters related to RVPs remain unclear. The chosen location for the north tunnel portal is not considered acceptable; and no provision has been made to provide an additional location to serve the south tunnel portal. It is not clear to the ESSP SG how the RVPs in the preliminary design will integrate with the proposed emergency hubs, or with emergency access roads and future evacuation assembly and routes for moving members of the public. Provisions for consultation on the details of RVPs and the use of additional, temporary RVPs are not considered adequate.

C - Designing for Safety and Security

8. The ESSP SG has been concerned for some time at the lack of progress towards designing and delivering a project which maximises safety and security benefits during the enabling works, construction and operational phases, as set out in its 56 Recommendations and the accompanying Appendix B. Limited progress has been made with a promised Security Working Group, and it is not clear whether due regard is being had to the detailed Recommendations of the Steering Group. Provisions for consultation with the ESSP SG on the safety and security details of the scheme, including through the TDSCG, are currently considered to be inadequate.

D - Tunnel design and cross-passage spacing

9. Similarly, there has been relatively little progress in discussing the tunnel design since the ESSP SG made its Recommendations in September 2021. This includes safety aspects of the tunnel design, Fixed Fire Fighting System, tunnel ventilation, fire fighting water supplies, evacuation proposals, and contractor emergency response preparedness in the event of an incident in the tunnel during the construction phase. Of particular and long-standing concern is the approach taken to cross-passage spacings as set out in Design Principle S6.01 ([APP-516](#)). The ESSP SG maintains its position that a cross-passage spacing of 100m, rather than 150m, should be the starting point, with any increase fully justified following consultation with the Emergency Services. Provisions for consultation with the ESSP SG on the detailed tunnel design through the TDSCG are considered to be inadequate.

E - Mitigation funding

10. The ESSP SG identified in its 56 Recommendations a number of areas where the LTC could potentially have an impact on the ability of its members to deliver their services, particularly during the design and construction stages. The Steering Group has requested funding to support additional police officer posts and vehicles; a co-ordination officer post and member officer time to respond to the future consultations on the detailed design and other matters; as well as provision to reimburse local authorities and the emergency services for the costs of dealing with major incidents on the LTC.
11. The ESSP SG considers that funding is required to mitigate the above impacts – which are not “business as usual” for its members – so as to make the project acceptable in terms of its safety and security. The ESSP SG does not accept the Applicant’s position that they will not provide funding from one publicly funded body to another, and points out that the scheme is understood to be a revenue-generating toll road. However, the ESSP SG does intend to continue its dialogue on this to seek a greater level of agreement with the Applicant.

F - Emergency Services response times

12. The ESSP SG is concerned that the LTC could, during its construction and operational phases, have a detrimental impact on the ability of the Emergency Services to respond to incidents (both on the road itself and in the general area) in a timely fashion. The Applicant is undertaking modelling, and the ESSP SG will consider the outputs of this exercise. However, it should be pointed out that response time modelling will be derived from the Applicant’s strategic LTAM modelling. There are concerns that such modelling may not be sufficiently fine-grained to fully identify impacts in the way that could be achieved if more local operational modelling for construction were used.

G - Emergency access, preparedness and response planning

The ESSP SG is concerned about a range of omissions and lack of detail related to emergency access roads, evacuation assembly areas, and how these will be integrated with RVPs and emergency hub provision through emergency response planning – covering aspects of both the construction phase and the operational phase. Even at a strategy / framework level this work appears to have been postponed, despite being raised in the 56 Recommendations of September 2021. Issues related to the adequacy of secured consultation expressed elsewhere also apply to this Key Concern.

H - Mental health, well-being and suicide prevention

The ESSP SG welcomes the fact that the previous omission of workforce wellbeing from the Health and Equalities Impact Assessment (HEqIA, [APP-539](#)) and associated mitigation proposals has been addressed. However, the group awaits responses to requests for further expansion and clarification on the stated commitments. This includes ensuring that scheme design features to minimize the risk of suicide are also applied during the construction phase; and securing measures through a new Design Principle expressly committing to the relevant prevention strategies and toolkits.