



PORT OF
TILBURY
LONDON

Section 56(2) Planning Act 2008

**Application by National Highways for an Order Granting Development Consent for
Lower Thames Crossing**

Planning Inspectorate Reference: TR010032

**RESPONSE TO EXA'S REQUEST FOR FURTHER INFORMATION AS TO THE PORT'S
EMERGENCY SYSTEM MANAGEMENT**

Deadline 1: 18 July 2023

1. Action point 4 from Issue Specific Hearing 1 [EV-023a] requests:

Without disclosing any security-relevant detail, please provide information identifying those aspects of the Ports' emergency system management / evacuation strategies that rely upon or have implications for the surrounding road network feeding onto the proposed LTC and thus might have implications on the LTC itself.

2. This note seeks to respond to this request by providing both a general overview of the emergency protocols, and specific concerns tied to the LTC Scheme itself.
3. The Port of Tilbury London, and Port of Tilbury London Police are defined as **Category Two** responders as defined by the Civil Contingencies Act (2004). PoTLL is also required to adhere to the protocols of the International Ship and Port Facility Code (ISPS) which came into being in July 2004, and the protocols set out by HM Revenue and Customs as an Authorised Economic Operator (AEO) in relation to Security and Safety. Other areas of legislation must also be adhered to in relation to the safe navigation of vessels, the movement of hazardous goods through the Port or the movement of explosives or commodities subject to firearms licencing conditions. The Port Marine Safety Code also states that the harbour authority must discharge its responsibilities for "*taking reasonable care, so long as the harbour or facility is open for public use, that all who may choose to navigate in it may do so without danger to their lives or property*", having the effect of making PoTLL responsible for the safety of persons and property within the harbour limits.
4. Any emergency plans, or protocols put in place must not affect our ability to adhere to these responsibilities. Further to that, any plans implemented by the LTC should not affect the operational effectiveness of the Port in relation to Safety and Security.
5. The Port of Tilbury London has emergency plans in place which are the responsibility of the Tilbury London Police and Health and Safety Team. These plans would complement those of Category One responders (Ambulance/Fire/Essex Police /Local Authority/NHS) who may respond to any incidents in the Port. Any plans developed by the LTC must not place additional pressure or risks on the current plans, provisions and responsiveness and must co-exist and work in conjunction with the plans the Port and category one responders have in place.
6. **GENERAL SAFETY & SECURITY OVERVIEW:** The Port of Tilbury London Police is responsible for the safety and security of the Port estate, providing a 24hr/365day response to incidents and emergencies. They also provide an effective first response to medical incidents with all Police vehicles carrying medical gases and defibrillators, and officers trained to Module-5 advanced first aid. Officers must be able to move about the Port freely in real time response to security and safety related incidents, including external road routes to access Tilbury 2 and 3.¹ The Police and partners (HDS Security) are responsible for maintaining the secure perimeter of the Port in line with the ISPS code and AEO protocols.
7. **VEHICULAR TRAFFIC:** With an estimated (average) 17,000² vehicle movements per day in the Port, effective traffic management is essential to allow vehicles to enter and leave the Port, and access the surrounding road networks. The main access into and from the Port of Tilbury is the A1089 which joins Tilbury and the A13 and wider road networks. Any LTC evacuation plans which may divert large volumes of traffic into the surrounding areas would have a detrimental effect on access to the Port, including for partner agencies such as East of England Ambulance Service, Essex Fire and Rescue and Essex Police. Limiting access to these partner agencies due to diverted traffic would adversely affect any required response to a safety or security incident in the Port.
8. **PEDESTRIANS:** If an evacuation was taking place at the LTC, some members of the public may be likely to self-evacuate from their vehicles and make their own way away from the incident. A process

¹ Tilbury3 is an area that is currently leased to LTC for use during construction, but which is intended to be developed in the future, as part of the Freeport. This land is held for the purposes of PoTLL's statutory undertaking.

² PoTLL's Relevant Representation [RR-0863] refers to 8,000 movements. To clarify, 8,000 movements refers to the HGV movements at Tilbury1 only; there are approximately 14,000 all-vehicle movements at Tilbury1 per day. In addition, there are 3000 all-vehicle movements at Tilbury2 each day, of which 2,000 are HGVs. In total, around 17,000 vehicle movements are associated with the Port each day.

to safely manage and direct these individuals to an RVP/Triage area would be required to prevent those members of the public seeking to self-disperse, from accessing the Port where there are restricted and operational areas with heavy plant, and machinery moving about and restricted and customs areas. Any incursion into the Port in a Restricted Area or Operational Area may have serious consequences for the security and safety of the Port and be a breach of the ISPS code.

9. **HGV DRIVERS:** If closures are put in place at the LTC to allow response to an incident at the crossing, often HGV traffic will seek to find parking in the nearby areas as they would have reached their permitted driving hours, in line with DVSA protocols, while waiting for the incident to be cleared and the road re-opened. An increase in this type of traffic into the area of the Port causes obstructions to the surrounding roads, poor parking obstructs visibility of road users which increases the risk of road traffic incidents. Without adequate safe and secure parking and support facilities, HGV vehicles in the area also become the object of social complaint and a target for antisocial behaviour and theft. Overnight parking is not permitted in the Port of Tilbury.
10. **REQUESTS FOR ASSISTANCE:** Often the Port of Tilbury London Police is asked to assist with incidents in the local vicinity of the Port in the absence of the home office Police, or British Transport Police. Any emergency response plans should take into account the limited jurisdiction of the Port Police as defined in Section 155 Port of London Act 1968. The Port of Tilbury London Police only retain the Powers of a Police Constable in the Port estate and 1 mile outside.
11. **LICENCES RELATING TO FIREARMS OR EXPLOSIVE MATERIAL:** Licences in place in relation to the movement of explosive material or firearms in/out of the Port dictate that loads subject to these licences which arrive by vessel must be escorted from the Port immediately and cannot be stored or held in the Port. Those items coming in by road will be escorted straight to the waiting vessel and loaded immediately in line with the licence provisions. Any road closures in the local area which prevent these commodities being handled and moved in line with the aforementioned information may cause a breach of the licence provisions.
12. **EVACUATION PROTOCOL IN THE EVENT OF FLOODING:** The Port of Tilbury has a detailed protocol covering emergency evacuation of the Port in the event of a failure of the Thames Flood Barrier, resulting in flooding of the Port. Such a flood event would affect LTC during construction and is likely to also affect LTC once operational; even if the tunnel is not flooded, PoTLL anticipates that traffic would be stopped from entering the tunnel as a precaution. Given the proximity of the Port with the tunnel, and the potential for persons to self-evacuate into the Port, it would be advantageous to ensure a single coordinated evacuation protocol applies to both the Port and tunnel area north of the river Thames.
13. PoTLL hopes that this information is of assistance to the ExA to understand the various ways in which the LTC Scheme has the potential to interact with its emergency procedures at a high level, both during construction and during operation. PoTLL seek to ensure that it is not inadvertently put into a position of breach of safety protocol and legislation as a result of the LTC Scheme, being constructed within and adjacent to the harbour boundary or resulting in additional investment, adaptation and resourcing on safety, security and emergency response as a result of direct and indirect effects of the construction or operation of the LTC .