

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

**Submission for Examination
Deadline 2 – 3 August 2023
(Rule 8 Letter Annex A –
Examination Timetable, item 16)**

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

**Comments on the Applicant's
amended Development Consent Order
(REP1-042, REP1-043)**

Introduction

1. These submissions by the Emergency Services and Safety Partners Steering Group (ESSP SG) are provided at Deadline 2, in accordance with the timetable set out in the Examining Authority's Rule 8 Letter Annex A, item 16. The submissions support the ESSP SG's Relevant Representations ([RR-0291](#)) and its Written Representations ([REP338](#)) submitted at Deadline 1.
2. The ESSP SG continues to work towards a greater level of agreement with the Applicant where possible, seeking to resolve outstanding concerns. The Applicant has provided preliminary information relating to a 'road map' - see the ESSP SG Written Representation [REP338](#) at paragraphs 23 – 25 for instance. The 'road map' is intended to explain how the Applicant has responded to each of the ESSP SG's 56 Recommendations (see Appendix C to the draft Statement of Common Ground ([REP1-200](#))). It is anticipated that, once the parties have worked through the "road map", a revised draft of the Statement of Common Ground will be produced in due course.
3. This further submission comments on the Applicant's amended Development Consent Order ([RR1-042 Clean version](#) ; [RR1-043 Track Changes version](#)).

Comments on the Applicant's amended Development Consent Order

Applicant Document 3.1, ([REP1-043](#), Track Changes)

4. As previously worded, Requirement 14(1) in Schedule 2 of dDCO ([AS-038](#)) required that, prior to the submission to the Secretary of State of an 'operational traffic impact monitoring scheme', the undertaker must consult with the bodies listed in Table 2.1 of the Outline Traffic Management Plan for Construction (OTMPfC, [APP-547](#)). Table 2.1 of the OTMPfC includes the 'Blue Lights Services'. Effectively, this would have meant that the Emergency Services would be consulted on the operational traffic impact monitoring scheme.
5. Requirement 14 has now been changed in [REP1-043](#) to require consultation with the bodies listed in Table 2.1 of the 'wider network impacts management and monitoring strategy'.
6. The following points arise for the ESSP SG:
 - a) it is suggested that the correct name for the document the Applicant now wants to refer to in Requirement 14(1) may be the "wider network impacts management and monitoring ~~strategy-plan~~" (WNIMMP), which is the title given to Applicant document 7.12 ([APP-545](#));
 - b) the ESSP SG seeks that the Applicant is required to consult with the Emergency Services on the 'operational traffic impact monitoring scheme'. This is consistent with ESSP SG Recommendation 8.6 and paragraphs 8.25 – 8.27 of its response to the Community Impacts Consultation dated 8 September 2021 (see Appendix C of the draft Statement of Common Ground [REP1-200](#)) which stated as follows:

8.25 The effective implementation of measures such as Traffic Regulation Orders throughout the construction phase and beyond (into the period covered by the Wider Networks Monitoring and Management Plan) could make a significant difference to the work of the emergency services, in particular that of roads policing. For a number of years, Essex Police employed staff in a "Traffic Management Officer" role. This provided a key point of contact between the Police, contractors and local highway authorities on new or existing road schemes. During the last 10 years these posts have been removed due to cost savings, with the roles and responsibilities instead linked to other job descriptions within the force. However, this has been at the cost of a reduced focus and output.

8.26 It is suggested that a full-time dedicated post should be funded to perform the role of police Traffic Management Officer, in line with the main responsibilities set out in Appendix E, including attendance at the construction phase Traffic Management Forum. The view of the ESSP Steering Group is that failure to create this post will result in a Police officer

being withdrawn from front line duties for the period of the construction. The officer would be based in Essex, but would cover the entire LTC route including the section in north Kent.

8.27 *The post would continue through into the initial post construction period, to be reviewed in light of the monitoring and recommendations of the WNMMP. Indeed, it is suggested that consideration should be given to extending the Traffic Management Forum approach to that initial operating period, albeit perhaps in a different form.*

c) However, the Emergency Services are not defined or currently listed as a stakeholder in Table 2.1 of the WNMMP as currently drafted ([APP-545](#)). This means that, as a result of the proposed changes to Requirement 14 of the dDCO, the Emergency Services would not be consulted on the operational traffic impact monitoring scheme. The ESSP SG objects to this outcome;

d) therefore the ESSPSG requests that the WNMMP ([APP-545](#)) is amended to:

- i. include a definition of the Emergency Services; and
- ii. add the Emergency Services to Table 2.1

7. If the above requests d)i) and d)ii) are implemented, then the ESSP SG has no objection to the proposed amendment to dDCO Requirement 14.