

**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
Relevant Representations Report
(REP1-180)**

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 Relevant Representations Report ([REP1-180](#)).

Comments on the Applicant's Relevant Representations Report

4. In Table 3.7 of [REP1-180](#) at the bottom of page 262, the Applicant makes the following statement:

'Following further engagement with emergency services, the Applicant has revised the locations of the rendezvous points located near the tunnel portals. These are designated areas that allow controlled access for emergency services in the event of an incident. The Applicant consulted on these locations during the Local Refinement Consultation in May 2022.'

5. In Table 3.10 of [REP1-180](#) on page 282 the Applicant makes the following statement:

'Emergency access and evacuation

The Applicant has and continues to work closely with representatives of the emergency services to ensure the Project is aligned with their requirements. Emergency access and rendezvous points have been included at appropriate locations after consultation with key stakeholders. More information can be found in the Project Design Report [Application Document APP-506 to APP-515].'

6. The ESSP SG does not consider this statement accurately reflects the current situation. The Local Refinements Consultation proposals for RVPs did not address concerns which the ESSP SG had raised in detailed advice to the Applicant in March 2022 (see Annex B of Written Representation [REP1-339](#)). The ESSP SG has outstanding concerns regarding the submitted provisions for emergency Rendez-Vous Points, which are not considered appropriate (see Draft Statement of Common Ground [REP1-200](#) item 2.1.25; and ESSP SG Written Representation [REP338](#) paragraphs 26 – 29). The ESSP SG continues to liaise with the Applicant on this and other matters.

7. In Table 3.10 of [REP1-180](#) towards the middle of page 284, the Applicant makes the following statement:

'Funding emergency services

The Project is committed to continual engagement with emergency services to develop appropriate construction and operational incident management plans and to minimise as far as reasonably practicable impacts on service capabilities. Furthermore, the Applicant will support the emergency services in determining operational impacts and service gaps to inform the Department of Transport and Home Office. However, it is not within the remit of the Applicant to reappropriate funding from the Project to other central government funded services.

A business proposal from an affected police force for an additional Traffic Officer to handle Project-related construction impacts has been accepted by the Applicant.'

8. The ESSP SG will continue to discuss this issue with the Applicant, particularly in relation to progressing the draft Statement of Common Ground ([REP1-200](#)) – see for instance items 2.1.17 and 2.1.20. However, it is not clear to the ESSP SG why the Applicant considers it appropriate to agree to funding of a traffic officer, but not to fund mitigations for other impacts on the activities of its members.