

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

**Submission for Examination
Deadline 3 – 24 August 2023
(Rule 8 Letter Annex A –
Examination Timetable, item 18)**

**Emergency Services & Safety Partners
Steering Group (ESSP SG)
(IP No. 20035777)**

**Comments on the Applicant's
Comments on WRs Appendix D
([REP2-049](#))**

Introduction

1. This submission by the Emergency Services and Safety Partners Steering Group (ESSP SG) responds to National Highways' Deadline 2 Submission – 9.53 Comments on Written Representations (WRs) Appendix D - Emergency Services and Safety Partners ([REP2-049](#)). That document sets out a table of comments set against identified paragraphs of the ESSP Written Representations ([REP1-338](#)) and associated Annexes ([REP1-339](#)). In the table on the following pages, the ESSP SG responds to selected comments by the Applicant against the relevant Written Representation (WR) paragraphs, for consistency. This submission is provided at Deadline 3, in accordance with the timetable set out in the Examining Authority's (ExA) Rule 8 Letter Annex A, item 18. 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. As part of that process, the table on the following pages makes reference to a 'road map'. ESSP SG has received an early draft of the 'road map' from National Highways, and attaches the latest version as Appendix A to this submission to inform the ExA as to progress. It should be noted that as this is an early draft, agreement has yet to be reached on several items, and there may be significant changes made over time.

WR Extract paragraph	Response to the Applicants Comments on ESSP SG Written Representation
4, 5	<p>The ESSP SG welcomes the fact that National Highways has agreed to its request and started to develop a ‘road map’. ESSP SG has received an early draft of the ‘road map’ and attaches the latest version as Appendix A to this submission.</p> <p>As it is developed, in some respects the ‘road map’ may not be dissimilar to the approach to detailed design and mitigation suggested by the ExA in ExQ1 – written questions and requests for information (PD-029):</p> <ul style="list-style-type: none"> a) Q16.1.2 - asking the Applicant for clarity on the design development process, which parties will be consulted, and whether this should be secured in the dDCO b) Q16.14 – suggesting the Applicant provide a single ‘mitigation route-map’. <p>The ESSP SG is seeking clarity on how each of its recommendations will be secured, how matters will be consulted on where necessary, across all of the DCO control documents and the subsequent proposals arising from those control documents.</p> <p>ESSP SG is currently considering a detailed response to the Applicant regarding the ‘road map’, and the intention is for this to contribute to the Statement of Common Ground. The ESSP SG and the Applicant have agreed a target of Deadline 5 for the submission of a new draft of the Statement of Common Ground.</p> <p>In addition, the ESSP SG intends to draw on the ‘road map’ in:</p> <ul style="list-style-type: none"> a) contributing to its preparations for the Issue Specific Hearings to be held in September; and b) preparing its responses to questions raised in ExQ1 (PD-029) which will be submitted by 19th September.
7, 8	<p>These comments by the Applicant deal with the future use of the Tunnel Design and Safety Consultation Group (TDSCG) to engage and consult with the ESSP over detailed matters of design for the road and (it is understood) the remainder of the Lower Thames Crossing road proposal.</p> <p>The ESSP SG remains concerned at the use of the TDSCG, for reasons already reflected in the draft Statement of Common Ground (REP1-200), and set out in its Written Representations (REP1-338). It is also worth pointing out that CD352 (Design Manual for Roads and Bridges (DMRB), CD 352 Design of road tunnels, Highways England 2020) contains limited details in paragraphs 2.15 – 2.16 and Appendix A2 on how the emergency services and safety partners would be consulted in practice.</p> <p>Whilst maintaining its objections to the use of the TDSCG, nevertheless the ESSP SG welcomes the Applicant’s statements that:</p>

WR Extract paragraph	Response to the Applicants Comments on ESSP SG Written Representation
	<ul style="list-style-type: none"> - In relation to point 7 ‘The Applicant is undertaking an exercise to review the proposals for further consultation and engagement with the ESSPSG in the draft DCO. - In relation to point 8 ‘The Applicant would welcome further discussion with the ESSP SG to address concerns about the use and form of TSDCG in future Project stages.’ <p>As reported above, the ESSPSG is in discussions with the Applicant to develop the ‘road map’, which may involve the Applicant setting out more detailed proposals for how they intend the detailed design to be developed and consult with its members through the TDSCG.</p> <p>This is an issue which clearly forms part of Q16.1.3 of the ExA’s first written questions ExQ1 (PD-029). Whilst Q16.1.3 is posed to the Applicant in the first instance, the ESSP SG intends to make submissions by the deadline of ED4 (19 September 2023), and it is hoped that progress will have been made by that time.</p>
13	<p>The ESSP SG notes the Applicant’s intention to update the Design Principles (APP-516) S3.20 and S9.21 to include a commitment to consultation with the Emergency Services on RVPs.</p>
15, 44	<p>The Applicant’s position is that overall, consultation with the ESSP SG on the detailed design of the LTC is secured through its license requirement to do so via the TDSCG as part of compliance with CD352 of DMRB.</p> <p>The ESSP SG notes and welcomes the Applicant’s intention to update the seven Design Principles (APP-516) (S3.20, S.3.21, S3.22, S6.01, S9.21, S9.23 and S9.24) to include a commitment to consultation with the Emergency Services. This could be usefully expanded to include other matters, such as identifying safe tunnel evacuation routes and muster areas (design principles S3.22 and S9.24) – though the ESSP SG’s preference would be for these to be identified at the preliminary design stage.</p> <p>However, the ESSP SG remains concerned at the proposed use of the TDSCG (as set out elsewhere in this submission), and notes that the use of the TDSCG is not secured in the dDCO and related submissions themselves. The ESSP SG welcomes the possibility that the Applicant may shed further light on this in its answers to Q16.1.3 of the ExA’s first written questions ExQ1 (PD-029). The ESSP SG will continue to discuss this with the Applicant to see if more common ground can be established.</p>
16 – 25, also 46	<p>The ESSP SG welcomes the Applicant’s proposal to update paragraph 6.7.5 of the Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) (REP1-157) to provide for contractor consultation with the Emergency Services on their Security Management Plans.</p> <p>However, the Applicant’s responses to the remaining points highlight a number of issues for the ESSP SG which include the following.</p>

WR Extract paragraph	Response to the Applicants Comments on ESSP SG Written Representation
	<p>Firstly, in relation to the detailed design the Emergency Services are only clearly identified in the Design Principles at clause S6.01 – there needs to be at least a definition which applies throughout the document.</p> <p>Secondly, in relation to the Code of Construction Practice, First Iteration of Environmental Management Plan (CoCP) (REP1-157) the main objection is that the matters of concern to the ESSP SG are not required to be included in contractor EMP2s. Instead, the Applicant proposes that EMP2s will include a requirement to separately produce the required management documents such as Security Management Plans and Emergency Preparedness Plans. That is to say, the management plans are treated by the Applicant as ‘EMP will require’ documents, as described in paragraph 2.3.10 of the CoCP.</p> <p>This means that the Emergency Services would be consulted on the contractor EMP2s, and this would be reported when the plans are submitted to the Secretary of State for approval; but there would be little of substance for the ESSP SG to comment on. It also means these management plans would be the subject only of contractor consultation with the ESSP SG, with no detail provided on the processes and scope of such consultation; and with no scrutiny by the Secretary of State of the issues raised.</p> <p>This is not acceptable to the ESSP SG, which is seeking to resolve this issue with the Applicant through evolution of the ‘road map’ leading to a greater level of agreement in the draft Statement of Common Ground (REP1-200). The ESSPSG also intends to make submissions on this in relation to Q16.1.4 of the ExA’s first written questions and requests for information (PD-029), suggesting the Applicant provide a single ‘mitigation routemap’.</p>
26 - 28	<p>The Applicant has shared information with the ESSP SG setting out the rationale for the selection and location of the RendezVous Point (RVP) at the north tunnel portal, as shown in the scheme preliminary design. However, that explanation is considered by the ESSP SG to not address the key issues, and does not justify the RVP as submitted. The ESSP SG also still has concerns regarding the southern tunnel portal RVP shown in the preliminary scheme design. Although the Applicant’s proposals were discussed with the Applicant at a meeting in January 2022, feedback from the ESSP SG objecting to those proposals was provided on 9 March 2022. Since that time until very recently there has been no further discussion between the parties regarding RVPs.</p> <p>The ESSP SG has arranged further meetings with the Applicant to discuss these points, and welcomes the fact that the Applicant has now taken up the previously made offer to visit an existing RVP at Stansted Airport to inform progress on this matter.</p>
31, 32	<p>In relation to the Security Working Group (SWG), it should be noted from the early draft ‘road map’ (for instance item 4.1 of Appendix A to this submission) that this body is not intended to form part of the formal DCO process of approvals. The ESSP SG welcomes recent moves to take the work of the</p>

WR Extract paragraph	Response to the Applicants Comments on ESSP SG Written Representation
	SWG forward, but maintains that progress has been inadequate to date, which has led to a lack of progress on resolving these security issues.
33 - 37	The ESSP SG welcomes the Applicant's intention to update design principle S6.01 (Design Principles APP-516) to provide greater clarity on the approach, looks forward to formal submission of this change to the examining authority, and will comment again in due course.

APPENDIX A

Road map July 2023 v2 (National Highways)

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
General					
2.1	2.1.1 (a-d)	<p>The Order should set out clearly the procedures and processes for approval of the detailed design, including those for consultation, so that there is no doubt about how it will be carried out. Specifically, it is recommended that the draft DCO is amended as follows:</p>	<p>General commentary on approval and consultation.</p> <p>The detailed design for the Project will be developed in accordance with the preliminary design (as shown in the Engineering Drawings and Sections, and General Arrangements). This is secured under Requirement 3 in Schedule 2 to the dDCO. The Design Principles [APP-516] set out the key principles that underpin the design and integration of the Project into its context.</p> <p>Where determined appropriate, the Design Principles set out further consultation requirements with stakeholders to assist in the development of the detailed design.</p> <p>The draft DCO also provides parameters within which the preliminary design may be delivered (for example the Limits of Deviation). Any change beyond these parameters are subject to a review process by the Secretary of State and/or the Planning Inspectorate, as set out in Requirement 3 of Schedule 2 of the draft DCO.</p> <p>The following sections respond to the ESSP SG recommendations on detailed design.</p>		<p>ACTION 01: National Highways to undertake a further review of design principles for which emergency services have a relevant interest and confirm consultation provisions.</p>

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
		<p>1. a clear definition of the Emergency Services is provided in the DCO, to encompass all Police, Fire and Rescue, and Ambulance services through which the National Highways will pass</p>	<p>1. Emergency Services Definition</p> <p>National Highways consider a clear definition of Emergency Services, in the context of the Project is provided in the Code of Construction Practice, First Iteration of Environmental Management Plan [Application Document AP-336]. National Highways does not consider further definition within the draft DCO [AS-038] is necessary.</p> <p>Paragraph 2.3.2 of the CoCP defines Emergency Services as: “blue-lights’ services, being Kent Police, Kent Fire and Rescue, Essex Police, East of England Ambulance Service, Essex County Fire and Rescue, Southeast Coast Ambulance Service, Metropolitan Police, London Fire Brigade and London Ambulance Service.</p> <p>Design Principle S6.01 [APP-516] also defines blue light services as above.</p> <p>National Highways acknowledges that the oTMPfC refers to ‘Blue-Light Services’ in Table 2-1 consultees without a definition of the relevant bodies. National Highways proposes to update the oTMPfC to be consistent with the CoCP and S6.01 in the definition of emergency services.</p>		<p>ACTION 02: Update existing oTMPfC reference in Table 2.1 from ‘blue-light services’ to ‘Emergency Services’ and provide the same definition as provided in the CoCP and Design Principles, referencing ‘blue-lights services’.</p>

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
		<p>2. the Emergency Services are named consultees on the preparation of and submission for approval of:</p> <p>a) the detailed design</p>	<p>2. Named consultees</p> <p>Detailed design</p> <p>There is no overarching requirement within the draft DCO for consultation with Emergency Services on general detailed design. National Highways acknowledges that there are specific design elements that the emergency services have an interest in and will seek to clarify which elements ESSP SG wish to review.</p> <p>Three existing design principles (S3.20, S3.21 and S3.22) relate to areas in which ESSP SG have expressed interest in the design, being the Rendezvous Points, helicopter landing areas and emergency hubs. National Highways acknowledges that these design principles do not currently have a requirement for consultation with emergency services and propose to update the design principles to require consultation on the relevant elements of the design.</p> <p>Although not specifically raised by the ESSP SG, National Highways notes that consultation on the provision of a helicopter landing area during construction is not specifically addressed in the DCO documents. National Highways propose to include a specific reference for a construction phase helicopter landing area to be included in the</p>		<p>ACTION 03:</p> <p>Update Design Principles 3.20, 3.21 and 3.22 as follows:</p> <p>S3.20 – An Emergency Services Rendezvous Point (RVP) area shall be provided. The detailed design and layout of the RVP will be developed in consultation with the Emergency Services.</p> <p>S3.21 – An area suitable (flat, unobstructed, stable) for landing a helicopter (air ambulance or similar) shall be identified in the vicinity of the tunnel portal inside of the Order Limits. The location of the landing area will be determined in consultation with the Emergency Services.</p> <p>S3.22 – Points suitable for initial mustering of tunnel evacuees, including safe access routes, shall be identified in the vicinity of the tunnel portal inside of the Order Limits. The detailed design and layout of the muster points will be developed in consultation with</p>

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			<p>emergency preparedness procedure requirements within the CoCP.</p> <p>National Highways also notes that there is a general requirement to comply with National Highways Standards which include the Design Manual for Roads and Bridges (DMRB) DMRB CD 352. CD 352 has a number of provisions relating to emergency services, including tunnel design and the operation of a Tunnel Design and Safety Consultation Group.</p> <p>Emergency Services will be engaged as appropriate through the design process in accordance with the National Highways design guidelines.</p>		<p>the Emergency Services.</p> <p>ACTION 04:</p> <p>Update paragraph 6.9.1 of the CoCP as follows:</p> <p>The EMP2 will require that Contractors will ensure that emergency preparedness procedures for each worksite are developed prior to works commencing, including the identification of a helicopter landing area in proximity to worksites. 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 access to the road network. The emergency procedures will be produced in consultation with the emergency services</p>
		<p>2. the Emergency Services are named consultees on the preparation of and submission for approval of:</p> <p>b) the Environmental Management Plan (EMP, Second Iteration)</p> <p>c) the EMP Third Iteration</p>	<p>Environmental Management Plan (2nd & 3rd iterations)</p> <p>A requirement for consultation with emergency services in the development of the EMP Second and Third iterations is already secured through Requirement 4 of Schedule 2 of the draft</p>		<p>No further action is proposed to respond to this recommendation.</p>

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			<p>DCO and the Code of Construction Practice. Table 2.1 of the CoCP specifies emergency services as a consultee on the EMP2 and EMP3. Requirement 20 of Schedule 2 Part 2 of the draft DCO details the requirements of consultation for those plans requiring Secretary of State approval (e.g. Requirement 4 EMP2).</p>		
		<p>2. the Emergency Services are named consultees on the preparation of and submission for approval of: d) the Landscaping Scheme</p>			<p>National Highways would like to understand further which elements of the landscaping scheme in the Outline Landscape and Ecology Management Plan ESSP SG request consultation on before confirming the best mechanism for consultation. If the requirement relates to Designing Out Crime, then National Highways considers the existing security management requirements, including consultation with emergency services, required in the CoCP, is the best mechanism for engagement. The oLEMP is not considered the most appropriate mechanism to secure design elements relating to crime as it</p>

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					largely relates to ecological management requirements. ACTION 05: National Highways to request further clarification is provided by ESSP SG on which elements of landscaping consultation is requested. ACTION 06: National Highways to confirm best mechanism for consultation, following clarification from ESSP SG.
		2. the Emergency Services are named consultees on the preparation of and submission for approval of: e) traffic management plans for each part of the construction phase	Traffic Management Plans A requirement for consultation with emergency services in the development of the Traffic management Plan is already secured through Requirement 10 of Schedule 2 of the draft DCO and the outline Traffic Management Plan for Construction (oTMPfC) [APP-547] through reference to consultees in Table 2.1. National Highways notes that Table 2.1 of the oTMPfC requires ‘Blue-Light Services’ to be a consultee on the Traffic Management Plan, noting that Blue Light Services are not defined. National Highways propose to update the oTMPfC to provide a consistent reference to emergency services as per the CoCP.		Refer to ACTION 2.

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
			<p>Table 2.2 of the oTMPfC states that emergency services will be part of the Traffic Management Forum.</p> <p>Table 2.3 of the oTMPfC details elements to be addressed in the TMP as it relates to the Emergency Services.</p>		
		<p>2. the Emergency Services are named consultees on the preparation of and submission for approval of:</p> <p>f) means of enclosure in accordance with Volume 1, Series 0300 of the Manual of Contract Documents for Highway Works</p>	<p>Fencing – Series 0300</p> <p>It is not clear which element of means of enclosure ESSP SG wish to be consulted on. Series 0300 relates to temporary and permanent fencing requirements for the road corridor but does not address security fencing requirements.</p> <p>If the ESSP SG concerns relate to consultation on security fencing and hoarding, then National Highways notes there are existing provisions in the CoCP relating to security management, which include requirements for consultation with emergency services. Paragraphs 6.7.8 to 6.7.14 of the CoCP sets out requirements for site fencing and hoarding. Paragraph 6.7.1 of the CoCP sets out the requirement for the Contractor to prepare a Security Management Plan (SMP). Paragraph 6.7.5 requires the Contractors to engage with the relevant Emergency Services in the production of the SMP.</p> <p>There is no requirement within the draft DCO or Series 0300 of the Manual of Contract Documents for Highway</p>		<p>ACTION 07: National Highways request that further clarification is provided by ESSP SG on which elements of the fencing provision consultation is requested.</p> <p>ACTION 08: National Highways to update paragraph 6.7.5 to “Contractors will consult with the relevant emergency services on the production of the SMP” to provide consistent language on consultation requirements.</p>

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			<p>Works to consult emergency services on general fencing (non-security) requirements.</p>		
		<p>2. the Emergency Services are named consultees on the preparation of and submission for approval of: g) the traffic impact monitoring scheme</p>	<p>Traffic Monitoring Table 2.1 of the WNIMMP provides a list of stakeholders to be consulted. Emergency Services has not been identified as a relevant stakeholder.</p>		<p>No further action is proposed to respond to this recommendation.</p>
		<p>3. 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 Secretary of State</p>	<p>3. Taking into account Emergency Services comments in consultation National Highways considers that the draft DCO already includes a requirement for consultation responses from the emergency services be considered in relation to Schedule 2 management plans (EMP2 & 3 and TMP) and details of how they are taken into account provided in any application to the Secretary of State for approval. Requirement 20 of Schedule 2 of the draft DCO sets out the requirements for how responses to consultation undertaken prior to Secretary of State approval of Schedule 2 management plans are to be addressed and documented. Where the Emergency Services have been identified as a consultee in Schedule 2, Requirement 20(1) requires:</p>		<p>No further action is proposed to respond to this recommendation.</p>

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			<ul style="list-style-type: none"> - Emergency Services to be provided with not less than 28 days to respond on any documents being consulted on - Due consideration of representations (responses) - Inclusion of representations made in the document submission and written details of how any representations have been taken into account in the submitted application. 		
		<p>4. the Emergency Services are given 8 weeks in which to provide their views when consulted by the undertaker.</p>	<p><u>4. Review period</u> National Highways notes the draft DCO provides the emergency services with an opportunity for an 6 week review period (42 calendar days) for Schedule 2 management plans if requested. National Highways considers the process set out in Requirement 20 (2) of Schedule 2 of the draft DCO balances the need for prompt review timeframes while still providing emergency services with the ability to request an extension if required. Requirement 20 (2) of Schedule 2 sets out the</p>		<p>ESSPSG to confirm their position on National Highway’s 6 week review period.</p>

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			<p>ability for emergency services to request an extension of the standard 'not less than 28 day review period' to not less than 42 days, consent for which by National Highways is not to be unreasonably withheld. This request is to be made not less than 21 days after receiving the documents for review. Requirement 20(3) then requires emergency services to provide the response to the consultation as soon as reasonably practicable during the period of extension up to the 42-day period.</p>		
2.2	2.1.17	<p>Funding should be provided for: a) 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; b) funding for ESSP Steering Group member officer time to carry out detailed reviews of the documentation coming forward</p>	Not secured in the DCO.		<p>National Highways has invited the emergency services group members to submit an Impact 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. National Highways will continue to review this recommendation in conjunction with the ESSP SG. ACTION 09: National Highways</p>

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					to respond to ESSP SG once DfT provides direction on funding.
2.3	2.1.27	A document should be produced providing a comprehensive assessment of the effects of the LTC on the activities of the emergency services and safety partners, with identified mitigation measures, and commitments in the proposals and control documents.	The DCO Application contains an Environmental Statement which has been produced in accordance with the requirements of the EIA Regulations. The Transport Assessment has also been produced in accordance with the DfT's TAG. In addition, the Applicant considers that other documents which are required under the Planning Act 2008 have been prepared in the DCO Application. The draft DCO includes commitments to consultation with the emergency services on elements of the project which relate to the emergency services scope of interest, such as traffic and security – refer to responses below relating to the CoCP and emergency response plans.		National Highways has worked with emergency services to review potential construction and operational impacts through traffic modelling at locations requested and agreed with emergency services. This data in the form of GIS maps has been provided to the Emergency Services for review. No further action is proposed to respond to this recommendation.
2.4	2.1.21	The DCO and scheme documents should provide a strategy or framework for providing and implementing Emergency Incident Management/Response Plans for the different stages and elements of the LTC –during both the construction (including enabling works) and operational phases.	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. For construction, the CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The CoCP	For operation, DMRB CD 352 states that emergency services shall be consulted through TDSCG on emergency response and evacuation, including formation of Emergency Response Plans. Emergency Response Plans will be developed for the tunnel,	No further action is proposed to respond to this recommendation.

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
			<p>(para 6.9.2) also requires these procedures be reviewed quarterly, or where there is a change in procedure. Requirement 4(5) of the dDCO Schedule 2 requires the development of an Environmental Management Plan (Third Iteration) which must set out matters relevant to the operation and maintenance of the Project. Paragraph 2.3.6 of the CoCP requires those relevant stakeholders (including emergency services) detailed in Table 2.1 of the CoCP to be consulted on matters relevant to their function.</p>	<p>and where applicable national plans/procedures will be used for the open road. The Project Road will be managed by National Highways, in accordance with standard National Highways Incident Management Processes (DMRB GM703), in order to provide a co-ordinated response to incidents, including:</p> <ul style="list-style-type: none"> • Management through the Regional Operations Centre • Traffic Officer resources • National management escalation structure for dealing with the response to different levels of incident. 	
2.5	n/a	The ESSP Steering Group and LTC should work together towards a Statement of Common Ground covering the issues and	An SoCG was submitted for deadline 1. An updated SoCG will be submitted at further deadlines during examination period.		

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		recommendations set out in this response.			
2.6	n/a	The project team should consider preparing a confidential Intelligence Plan and Requirements document to include, for instance, details of ANPR systems to be installed along the route.		National Highways is the strategic highway authority, and as part of its licence is required to ensure the effective and safe management of the DCO. Details on ANPR are not, as a matter of course, consulted on as part of the planning application for roads, but dealt with at the appropriate stage in the design and operational phase.	No further action is proposed to respond to this recommendation.
Protest					
3.1	2.1.6	The ESSP Steering Group recommends that LTC liaises (or continues to liaise) with community and protest groups in advance of construction of the project. This should include discussing with those groups the potential value of identifying protest areas which might meet their needs in a safe way.	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. The CoCP [APP-336] (Section 6.7) requires the Contractor to prepare a Security Management Plan which will detail how they propose to manage protest action. CoCP paragraph 6.7.5 requires engagement with emergency services on the production of the SMP. The Contractor is required in accordance with para 6.7.4 of the CoCP to detail all reasonable measures to negate and minimise the likelihood of protester actions which		No further action is proposed to respond to this recommendation.

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
			<p>require the mobilisation of specialist support removal teams or resources and is also responsible for non-specialised removal of protesters and trespassers from the site, compounds and other work areas under their control.</p> <p>The Contractor is required to engage with the relevant emergency services on the production of the SMP and responses from the emergency services will need to be included in the draft Security Management Plan sent to the Secretary of State for approval as part of the EMP (2nd iteration).</p> <p>There is no requirement within the draft DCO or control plans for either National Highways or it’s Contractors to liaise with protest groups prior to commencing construction.</p> <p>Provisions for addressing protester actions are in place at Project and National Highways level although these are not secured as part of the draft DCO or control plans. There is no requirement for specific protest areas to be identified within the draft DCO and control plans.</p>		
3.2	2.1.7	Preparation of a Protest Plan (or a protest section within an	The CoCP [APP-336] (Section 6.7) requires the Contractor to prepare a		ACTION 10: Update

Rec No.	SoCG Item No.	ESSP SG Recommendation	How is this secured in the DCO?	Matters for detailed design and/or operation	Further notes and proposed action
		incident response or management plan) should be considered.	Security Management Plan which will detail how they propose to manage protest action. CoCP paragraph 6.7.5 requires engagement with emergency services on the production of the SMP. National Highways proposes to amend the reference in paragraph 6.7.5 from engage to consult to make wording consistent throughout the management plans.		paragraph 6.7.5 to read: “Contractors will <i>consult</i> with the relevant emergency services on the production of the SMP.”
3.3	2.1.6	The ESSP Steering Group recommends that a general protest area is identified on the approved plans, within the Order Limits.	The CoCP [APP-336] (Section 6.7) requires the Contractor to prepare a Security Management Plan which will detail how they propose to manage protest action. CoCP paragraph 6.7.5 requires engagement with emergency services on the production of the SMP. An area designated for protest is not included in DCO, and provision for a general protest area is not proposed to be added to the Book of Plans. Consideration of provision of a general protest area would be addressed by the Contractor through the development of the Security Management Plan.		No further action is proposed to respond to this recommendation.
Security					
4.1		It is recommended that the future work of the Security Working Group is scoped and clarified, so that it is fully effective in influencing the scheme design and construction. This can take place outside the	The scope of a Security Working Group is not secured in DCO, nor is there a requirement for the establishment for a Security Working Group as part of the dDCO.	Any requirements for a Security Working Group would be addressed by the Contractor through the Security	No further action is proposed to respond to this recommendation.

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		scope of the DCO and control documents.		Management Plan.	
4.2		The Construction Code of Practice should be amended to set out a strategy for dealing with security issues, with an overall procedure for all contractors to follow, and including reference to established standards, to ensure consistency across all sites.	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. Section 6.7 of the CoCP [APP-336] sets out the requirements for work site security including the requirement for Contractors to use guidance from the National Protective Security Authority website and the Physical Security Execution Plan (prepared by National Highways) to develop their Security Management Plan.		No further action is proposed to respond to this recommendation.
4.3		Security issues should be included within the work of the Joint Operations Forum referred to in section 4.3 of the Construction Code of Practice, with a requirement to include security in detailed contractor proposals	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. CoCP [APP-336] paragraph 4.3.4, bullet point h) includes 'security' as a topic to be coordinated in the Joint Operations Forum (JOF).		No further action is proposed to respond to this recommendation.
4.4		The security issues identified in Appendix B to this response should be addressed in detailed proposals for both the construction phase (including enabling works) and the detailed design of the LTC. This should be referenced in the Design Principles.	Paragraph 6.7.1 of the CoCP sets out the requirement for the Contractor to prepare a Security Management Plan (SMP), and includes the requirement to use industry guidance and standards. Paragraph 6.7.5 of the CoCP requires the Contractors to engage with the relevant Emergency Services in the production of the SMP. Paragraph 6.7.7 of the CoCP sets out a number of measures to be used by the Contractor where		ACTION 11: National Highways to confirm amendment to CoCP paragraph 6.6.5 to include sharing site layouts with relevant DOCO teams for information purposes.

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			<p>appropriate to prevent unauthorised access to sites.</p> <p>Site fencing and hoarding requirements are documented in paragraphs 6.7.8 to 6.7.14 of the CoCP.</p> <p>There is no provision within the CoCP for site layouts to be provided to the Designing Out Crime Officers prior to works commencing, nor provision for responding to commentary on the layouts. Paragraph 6.6.5 requires the site layouts to be provided to the relevant local authorities for information, prior to works commencing.</p> <p>National Highways would be open to sharing site layouts with DCO for information purposes. National Highways do not propose to add Emergency Services as a member of the Joint Operations Forum. This is an internal forum between the Project team, Contractors and Utilities companies undertaking works and does not have any external membership.</p>		
4.5		<p>The ESSP Steering Group recommends that the measures and requirements set out in [the submissions from September 2021] are identified in approved plans and/or control documents.</p>	<p>This document sets out responses to the September 2021 submissions and National Highways will continue to engage with the ESSP SG to discuss and review any further recommendations.</p>		
4.6		<p>Clarification should be provided that the design has and will consider the risk of modern slavery, human trafficking and other</p>	<p>There is no specific requirement within the draft DCO in relation to managing these matters in the design.</p>		<p>No further action is proposed to respond to this recommendation.</p>

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		hidden vulnerability and harm exploiting the new route, and in the location and detailed design of the worker accommodation proposals.	National Highways confirms there is a contractual requirement for the Contractors to comply with the provisions of the Modern Slavery Act 2015, including an audit of compliance, transparency statement and risk register. These are internal contractual documents to be prepared by the Contractors and not considered appropriate for provision to the Secretary of State.		
Emergency Access					
5.1		The procedures and requirements for the development of Contractor emergency plans should be formalised in the DCO, to include an explicit requirement for approval, and a commitment to consultation with relevant emergency services and safety partners. This could be combined with provisions in the Construction Code of Practice and the Construction Traffic Management Plan.	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. The CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The CoCP (para 6.9.2) also requires these procedures be reviewed quarterly, or where there is a change in procedure. As the requirement for emergency preparedness procedures are required by the CoCP, then this requirement is secured under Requirement 4(2) of the DCO.		No further action is proposed to respond to this recommendation.
5.2		Provision should be made for helicopter landing during the construction phase at	The Works Plans provided in the Book of Plans do not set out a specific location for a helicopter		Refer to Action 04.

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		locations in addition to the hyperbaric facilities at the northern tunnel portal. Identification of helicopter landing facilities should be made a requirement prior to commencement of the development, and their location should be confirmed in approved plans.	landing area during construction as this will be a matter for the Contractor to determine through the emergency preparedness procedures based on active work areas and may be subject to change as works progress. The CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The emergency preparedness procedures are considered the most appropriate document to set out the location for the construction phase helicopter landing area and paragraph 6.9.1 is proposed to be amended to include provision for helicopter landing areas – refer to Action 04.		
5.3		Emergency access arrangements should be included within the emergency preparedness procedures to be developed in consultation with the emergency services and safety partners, as outlined in the CoCP. This should include ensuring that any internal haul roads which might be used by the emergency services are fit for that purpose.	National Highways considers that the draft DCO already contains provisions to address this recommendation through the CoCP. The CoCP [APP-336] requires in para 6.9.5 for internal haul roads which might be used by emergency services to be fit for that purpose.		No further action is proposed to respond to this recommendation.
5.4		Emergency preparedness procedures should	National Highways considers that the draft DCO already contains		No further action is proposed to

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		include ensuring that communications provisions are compatible with those used across all of the emergency services and other responding organisations, not just Fire and Rescue (bearing in mind the planned change from Airwave to a new Emergency Services Network), and the continued requirement for ability to use the mobile phone network.	provisions to address this recommendation through the CoCP. The CoCP [APP-336] requires in para 6.9.3 for emergency radio channels to be reserved and compatible with those used by Emergency Services – defined in the CoCP as the 'blue-light services' Kent Police, Kent Fire and Rescue, Essex Police, East of England Ambulance Service, Essex County Fire and Rescue, Southeast Coast Ambulance Service, Metropolitan Police, London Fire Brigade and London Ambulance Service		respond to this recommendation.
5.5		All of the emergency access road provisions in the scheme should be consistently referred to in the DCO, and labelled as such on the relevant Works, Integrated Care Partnerships General Arrangements, Tunnel Area and other approved plans and drawings.	Emergency access provisions have been made in the design and are detailed in Schedule 1 of the dDCO, for example, Work Nos 6D (v) and (vi), 7W (ii) and 8D (v) and (vi). The locations of these emergency access roads are shown on the Works Plans – Volume C – Composite [AS-026] and General Arrangement Drawings – Volume C [APP-017].		No further action is proposed to respond to this recommendation.
5.6		The arrangements for emergency services to enter the emergency access roads should be designed in accordance with the advice provided in Appendix B to this response. This should form part of an approved Emergency Response / Management Plan for the road.	National Highways acknowledges the request for DOCO liaison and Essex Police consultation in Appendix B. National Highways notes the CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the		No further action is proposed to respond to this recommendation.

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			<p>emergency services in development of these procedures. The CoCP (para 6.9.2) also requires these procedures be reviewed quarterly, or where there is a change in procedure.</p> <p>As the requirement for emergency preparedness procedures are required by the CoCP, then this requirement is formalised within the DCO through the CoCP which is a control document requiring approval by the Secretary of State.</p>		
5.7		<p>Emergency Response / Management Plans for the LTC should be required to address how prompt access to incidents is to be achieved, especially if traffic backs up, and given the absence of a hard shoulder. In the absence of these plans to deliver emergency service access to incidents, the ESSP Steering Group’s default position is that a hard shoulder should be provided.</p>			<p>National Highways considers that the Project is no different to other purpose-built trunk roads within the UK and National Highways has well established procedures for managing access to incidents for emergency services. The project team has worked with emergency services to agree to additional access and egress points along the route to facilitate emergency services access to incidents.</p> <p>National Highways confirms no hard shoulder is provided in the design for the Project.</p> <p>No further action is proposed to</p>

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					respond to this recommendation.
5.8		The width of the tunnel emergency access roadways should be assessed in terms of their adequacy to accommodate emergency vehicles (including a review of appliance turning circles), allow sufficient facility for vehicles to pass, and to avoid conflict with members of the public evacuating the tunnel.	National Highways considers that the lane widths for the tunnel emergency access roadways, defined within the Engineering Drawings and Sections Volume B (A122 National Highways cross sections) [APP-031] are appropriate to accommodate emergency service vehicles to pass and avoid conflict with members of the public evacuating the tunnel.		No further action is proposed to respond to this recommendation.
5.9		As removeable barriers are an important element of emergency response around the tunnel: a) they should be clearly identified as such in the DCO Works in Schedule 1 b) justification should be provided for their positioning and number, related to plans for responding to incidents, with consideration being given to the provision of additional removeable barriers.	Removable barriers at the south portal and north portal are labelled in the Engineering Drawings and Sections Volume A on Sheets 1 and 4 [APP-030] respectively. The portal removable barriers are not labelled as a specific work in Schedule 1 of the draft DCO and National Highways does not consider it necessary to include these as a specified work as they are documented in the Engineering Drawings.	The provision of additional removable barriers would be dealt with through the detailed design process in accordance with existing National Highways standards which require consultation with emergency services on elements such as removable barriers.	No further action is proposed to respond to this recommendation.
5.10		Clear provision should be made in the preliminary design for designated emergency helicopter landing areas close to the north and south portals. These could be shown on the control drawings and referenced in the list of authorised Works in the DCO.	Design Principle S3.21 requires an area suitable for landing a helicopter in the vicinity of the tunnel. The location of the helicopter landing area will be determined by the Tunnels Contractor through their detailed design and is therefore not able to be included in the preliminary design as part of the DCO Application. Design Principle S3.21 does not currently		Refer to Action 03.

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			require consultation with the Emergency Services on the helicopter landing area. National Highways propose to update S3.21 requiring consultation with emergency services on the provision of the helicopter landing area.		
Rendezvous Points (RVPs)					
6.1		The preliminary design should be amended to reflect the acknowledged need for Emergency Services Rendezvous Points (RVP), both in the general vicinity of the tunnel portals, and elsewhere along the route. RVP should be included in the list of authorised Works in Schedule 1 of the DCO, and indicated on the approved Works Plans.	Emergency Services Rendezvous Points are identified in Schedule 1 of the draft DCO [AS-038] as Works Nos. 3F and 5A. The general location of the Works are shown on Sheets 13 and 16 of the Works Plans Volume B – Composite [AS-024] being the north and south portal areas in the vicinity of the Tunnel Services Buildings.		ACTION 12: National Highways acknowledges the emergency services written representation noting concerns with regard to the RVP. National Highways propose further engagement with ESSPSG to understand concerns, discuss the justification of proposed areas, alternatives considered and work through potential solutions.
6.3		Consideration should be given to the location of RVPs at an early stage, so that the following can be taken into account in the preliminary proposals: a) road links b) availability of land c) integration with emergency access routes and Emergency Hubs. d) RVP should be identified in more detail on the General Arrangement Drawings if appropriate.	Emergency Services Rendezvous Points are identified in Schedule 1 of the dDCO [AS-038] as Works Nos. 3F and 5A. The general location of the Works are shown on Sheets 13 and 20 of the Works Plans Volume B – Composite [AS-024] being the north and south portal areas in the vicinity of the Tunnel Services Buildings. The locations are also shown on Sheets 13 and 20 of the General Arrangement Drawings Volume B [APP-016]		Refer to Action 12.

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6.4		The preliminary scheme design should be reviewed to consider whether there are other locations on the proposed route, away from the tunnel portal areas, where RVP could be provided, and to include these in the development of Emergency Response Plans.			The preliminary design has been reviewed and no other locations have been identified as suitable. Refer to Action 12.
Emergency Hubs					
7.1		The preliminary design should be amended to provide Emergency Hubs at the tunnel portals, with consequent changes to the list of authorised Works in Schedule 1 (and corresponding Works Plans), the General Arrangement drawings if appropriate. The Emergency Hubs should be integrated with the provision of Rendezvous Points and Forward Control Points, as discussed in the previous section of this response. Details of the Emergency Hubs should be the subject of consultation with the Emergency Services prior to submission to the Secretary of State for their approval.	The Tunnel Services Buildings (TSB) located at the northern and southern portals have been designed to have enough meeting, control and welfare facilities to be used as an emergency hub. Details on the TSBs are provided in the Structures Plans Volume B [APP-044] for the north and south portals. Tunnel Services Buildings are listed in Work No. 3C and 5A in Schedule 1 of the draft DCO.		No further action is proposed to respond to this recommendation.
7.2		What is intended by the new emergency area noted in Work No. 5A (ix) in Schedule 1 of the draft DCO (Works plans 13 and 17) should be clarified in the DCO documents, shown on the General Arrangement drawings and approved plans,	Work No 5A (ix) in Schedule 1 of the dDCO [AS-038] describes a new rendezvous emergency area at the northern portal which is shown in Sheet 20 of the General Arrangement drawings – Volume B [APP-016] and Sheet 20 of the Works		No further action is proposed to respond to this recommendation.

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		and referred to in the description of the development (for instance in Chapter 2 of the Environmental Statement).	Plans – Volume B – Composite [AS-024]. The South portal emergency rendezvous area is described as Work No. 3F and is shown on Sheet 13 of both the General Arrangement drawings – Volume B [APP-016] and the Works Plan – Volume B – Composite [AS-024]. No rendezvous points are shown on Works Plan Sheet 17.		
Emergency Services Response Times					
8.1		A review should be undertaken of the impacts of the LTC on emergency services.	The DCO Application contains an Environmental Statement which has been produced in accordance with the requirements of the EIA Regulations. The Transport Assessment has also been produced in accordance with the DfT's TAG. In addition, the Applicant considers that other documents which are required under the Planning Act 2008 have been prepared in the DCO Application. The draft DCO includes commitments to consultation with the emergency services on elements of the project which relate to the emergency services scope of interest, such as traffic and security.		National Highways has worked with emergency services to review potential construction and operational impacts through traffic modelling at locations requested and agreed with emergency services. This data in the form of GIS maps has been provided to the ESSPSG.
8.2		Further modelling and assessment of the impacts of the LTC on emergency service response times and targets should be undertaken.			National Highways has undertaken bespoke traffic modelling following the recommendation by ESSP. The outputs of the

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					<p>modelling were agreed with ESSP. Nominated operational modelling locations were agreed with ESSP and GIS maps have been provided to ESSP for comment. Construction phase locations have also been agreed with those ESSP members who have provided locations to model, and the outputs have been provided.</p> <p>ACTION 13: ESSP SG to provide comments on modelling for National Highways follow up.</p>
8.3		<p>Following the further assessment of response times, mitigation measures should be proposed where necessary to ensure that emergency service responses do not deteriorate as a result of the project. Mitigation may include:</p> <p>a) funding additional emergency service staffing and vehicles over the construction phase</p> <p>b) requirements on contractors to commission private emergency service support such as ambulance cover with appropriate levels of staffing, training, hours of cover and working practices to be agreed</p>			<p>The modelling outputs have not identified any requirement for additional mitigation measures and the ESSP has not provided comment on the outputs to date. National Highways has worked with emergency services to review potential construction and operational impacts through traffic modelling at locations see 2.3 above. No further action is proposed to</p>

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		and reviewed with the ESSP Steering Group on an annual basis			respond to this recommendation.
8.4		The Emergency Services should be formally consulted on the production and approval of the Traffic Management Plans as a requirement of the DCO.	A requirement for consultation with emergency services in the development of the Traffic management Plan is already secured through Requirement 10 of Schedule 2 of the draft DCO and the outline Traffic Management Plan for Construction (oTMPfC) [APP-547] through reference to consultees in Table 2.1. National Highways notes that Table 2.1 of the oTMPfC requires 'Blue-Light Services' to be a consultee on the Traffic Management Plan, noting that Blue Light Services are not defined. National Highways propose to update the oTMPfC to provide a consistent reference to emergency services as per the CoCP. Table 2.2 of the oTMPfC states that emergency services will be part of the Traffic Management Forum. Table 2.3 of the oTMPfC details elements to be addressed in the TMP as it relates to the Emergency Services.		Refer to Action 02.
8.5		The proposals and (if necessary the draft DCO) should make the setting up of the Traffic Management Forum a clear commitment of the project.	A clear commitment for a Traffic Management Forum is included in the oTMPfC [APP-547]. Table 2.2 of the oTMPfC stipulates that the Emergency Services will be part of the Traffic Management Forum.		No further action is proposed to respond to this recommendation.
8.6		Funding should be provided for the creation of a Police Traffic Management			The Applicant will work with Essex Police to consider whether the

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		Officer, as described in paragraphs 8.23 – 8.25 and Appendix E of this response, to cover the construction phase and the first five years of operation of the LTC.			traffic management officer role agreed with the A12 project can be shared with LTC.
Displacement from a tunnel incident / emergency					
9.1		The DCO list of authorised Works in Schedule 1 should include reference to the provision of tunnel evacuation assembly areas, and these should be indicated on the Works plans, shown on the General Arrangement drawings if appropriate, with further detail required be reference to the Design Principles. The proposals should include details of safe routes from the tunnel to the evacuation assembly areas. Such plans referenced in this recommendation should be approved plans	The draft DCO secures the need for emergency muster points through Design Principle S3.22 which requires the identification of suitable emergency muster points in the vicinity of the tunnel portal.	National Highways considers this is a requirement that is appropriate for development during the detailed design to integrate into other tunnel systems. As such, it is not considered appropriate to specify a location within the General Arrangement drawings	Refer to Action 03 in relation to including requirements for consultation with emergency services for S3.22.
9.2		Any Emergency Response/ Incident Management Plan prepared for the tunnel must include an evacuation section, and extend to show how the scheme will provide for the welfare of members of the public during both short term and longer term incidents; how road users will be reunited with their vehicles where possible; and the means of transport away from the tunnels where necessary. Any Emergency	The CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The CoCP (para 6.9.2) also requires these procedures be reviewed quarterly, or where there is a change in procedure. As the requirement for emergency preparedness procedures are required by the CoCP, then this	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.	No further action is proposed to respond to this recommendation.

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		Response/Incident Management Plan should be a control document.	requirement is formalised within the DCO through the CoCP which is a control document requiring approval by the Secretary of State.		
9.3		Response plans and contractual arrangements with the scheme operators should include provisions to reimburse local authorities and emergency services in for their costs in dealing with major incidents in appropriate circumstances.			National Highways has invited the emergency services group members to submit an Impact 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. National Highways will continue to review this recommendation in conjunction with the ESSP SG. Refer to Action 09.
Fire Suppression and Management of Incidents Within the Tunnels					
10.1		The Construction Code of Practice should make a clear commitment for contractors to produce emergency response plans for dealing with fire incidents in the tunnel, in consultation with the emergency services. These should include any particular requirements related to access from the public highway via internal haul roads, and address	The CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The CoCP (para 6.9.2) also requires these procedures be reviewed quarterly, or		No further action is proposed to respond to this recommendation.

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		the risks to both the workforce and emergency service personnel. The CoCP should also set out the minimum contents required to be included in the Emergency Response Plans as described at paragraph Error! Reference source not found. above.	where there is a change in procedure. As the requirement for emergency preparedness procedures are required by the CoCP, then this requirement is formalised within the DCO through the CoCP which is a control document requiring approval by the Secretary of State.		
10.2		The draft DCO, the Works plans, General Arrangement drawings, Tunnel Area plans and the Tunnel Limits of Deviation should be amended to be clear on the location, number and spacing of tunnel cross-passages which are sought under the Order. If flexibility is required, the cross-passages could be shown on the drawings and expressed in the other documents as subject to confirmation within stated parameters, including the range of separation distances. The ESSP Steering Group considers that these parameters should be expressed in a way which is consistent with paragraph 3.26.1 of CD 352, i.e. 100m, up to a maximum of 150m subject to a quantitative risk analysis.	The spacing of tunnel cross passages is addressed by Design Principle S6.01 [APP-516] and secured as part of the Design Principles document which is a controlled document. The location of cross passages are shown at indicative 150m spacings in the relevant Works Plans, General Arrangement, and Engineering Drawings. The Design Principle S6.01 sets out the maximum distance between passages and requires engagement with the emergency services should a departure be required.	The DMRB CD 352 paragraph 2.15 requires National Highways to set up and operate a Tunnel Design and Safety Consultation Group. It is noted that this is a consultation group and the heads of terms for the TDSCG will need to be agreed by all parties at the start of the meetings, in particular how recommendations are carried forward into the design.	ACTION 14: National Highways to amend S6.01 to make consultation terminology consistent and add reference to updated risk assessment as follows: S6.01 – “The preliminary scheme design has a 150m maximum spacing between cross-passage centre lines. The spacing between cross-passages in the detailed design will be developed in accordance with DMRB CD 352 Design of road tunnels (Highways England 2020c) and supported by risk assessment. The emergency services shall be consulted on the risk assessment and determination of

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					<p>cross-passage spacing.</p> <p>If departures from the standard are proposed that would result in spacing of greater than 150m, there shall be consultation with emergency services on their distance.</p> <p>To support any cross-passage spacing greater than 100m between centre lines, a Fixed Fire-Fighting System (FFFS) will be deployed within the tunnel bore. There shall be consultation with the emergency services on the type and specification of the FFFS."</p>
10.3		LTC should consider revising the Operational Risk Assessment to address a scenario where both tunnel bores are closed at the same time.			The scenario of a fire causing both tunnel bores to be closed at the same time has been considered in an operational risk assessment and the assessment found that there is a remote probability and consequently any mitigation would be disproportionate. This matter will be discussed further with the ESSP SG

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					to elaborate on the rationale for this decision. No further action is considered necessary to address this recommendation.
10.4		If flexibility is sought through the Order, the cross-passage design and spacing in detailed design must be subject to thorough consultation prior to approval by the Secretary of State, with the Emergency Services named as statutory consultees. This would be along the lines referred to in the recommendations made in the General Points section of this Response.	The spacing of tunnel cross passages is addressed by Design Principle S6.01 [APP-516] and secured as part of the Design Principles, General Arrangement Drawings and Engineering Drawings and Sections. The locations of cross passages are indicatively shown in the General Arrangement drawings Volume B [APP-016], Works Plans Volume B [AS-034] and the Engineering Drawings and Sections (Volume A) [APP-030]. The Design Principle S6.01 sets out the maximum distance between passages and requires engagement with the emergency services should a departure be required.	The DMRB CD 352 paragraph 2.15 requires National Highways to set up and operate a Tunnel Design and Safety Consultation Group. It is noted that this is a consultation group and the heads of terms for the TDSCG should be agreed by all parties at the start of the meetings, in particular how recommendations are carried forward into the design.	Refer to Action 14
10.5		Given the potential advantages it offers, the ESSP Steering Group consider that a Fixed Fire Fighting System should be an unequivocal commitment in the preliminary design, DCO and control documents, to be approved in detail. This is especially important if crosspassage spacing may be increased from the benchmark 100m stated in CD 352.	The Design Principle S6.01 [APP-516] sets out the requirement engagement with the emergency services should a departure be required.		No further action is proposed in relation to this recommendation.

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10.6		The British Automatic Fire Sprinkler Association should be consulted at an early stage in the detailed design of the tunnel and the FFFS.	The DCO has no requirement to consult with the British Automatic Fire Sprinkler Association and they are not a listed body. Kent Fire subsequently advised via email (5 June 2023) that BAFSA may not be the obvious point of contact and suggested alternate engineering guidance for review.		ACTION 15: Kent Fire and Essex Fire to confirm if they consider that consultation with BAFSA is still recommended.
10.7		The detailed tunnel design should be subject to thorough consultation with the Emergency Services from the outset, and not just prior to submission to the Secretary of State for approval. LTC should consider whether details of the tunnel safety design should be specifically and separately identified in the DCO as a matter where a dispute mechanism is required, should there be a difference of opinion with the Emergency Services.	National Highways considers that appropriate elements of the tunnel safety design are embedded in the design of the tunnels shown in the DCO Application documents. Those elements of the design relating to Emergency Services have been added to the design principles, such as S3.20, S3.21 and S3.22. As per National Highways response to 2.1, we will work with ESSP SG to identify any additional design elements for consideration through consultation. National Highways has been engaging with Emergency Services from the outset including through initial Tunnel Design Safety Consultation Group (TDSCG) discussions. National Highways acknowledges Emergency Services concerns in relation to early engagement with the TDSCG as set out in the Written Representation. The establishment and operation of the TDSCG is a National Highways requirement through		National Highways note that there have been previous requests by the ESSPSG for the provision TDSCG (under DMRB CD352) to also be secured in the DCO. At the same time, ESSP SG stated they are not satisfied with TDSCG model. Can ESSPSG please confirm their preferred suggestion? No further action is proposed to respond to this recommendation.

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			<p>paragraph 2.15 of the DMRB CD 352. National Highways does not consider it necessary to secure the TDSCG through the DCO. National Highways will continue to engage with the ESSP SG and will work through any concerns on the process, particularly with regard to how recommendations are addressed through detailed design.</p>		
10.8		<p>A multi-agency Emergency / Incident Response Plan for the tunnel should be a requirement of the DCO, for approval by the Secretary of State in consultation with the Emergency Services. The Emergency / Incident Response Plan should be a control document.</p>	<p>The CoCP [APP-336] requires in para 6.9.1 the Contractors to prepare emergency preparedness procedures for each worksite. The CoCP (para 6.9.1) requires consultation with the emergency services in development of these procedures. The CoCP (para 6.9.2) also requires these procedures be reviewed quarterly, or where there is a change in procedure. As the requirement for emergency preparedness procedures are required by the CoCP, then this requirement is formalised within the DCO through the CoCP which is a control document requiring approval by the Secretary of State.</p>	<p>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.</p>	<p>No further action is proposed to respond to this recommendation.</p>
Suicide prevention, mental health and wellbeing					
11.1		<p>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</p>	<p>Details relating to workforce mental health are described in paragraphs 7.12.9 and 7.12.19 to 7.12.21 of the Health and Equalities Impact Assessment [APP-539]. The Register of Environmental Actions and Commitments (REAC)</p>		<p>No further action is proposed to respond to this recommendation.</p>

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		<p>phase of the LTC, including those who do not currently live in the area. Any requirements for mitigation of adverse impacts should be linked to the Construction Code of Practice. The review should take into account, among other guidance, the Kent and Medway Suicide Prevention Strategy, and the ESSP Steering Group, should be involved in this review.</p>	<p>provided in the Code of Construction Practice [APP-336] includes a commitments in REAC PH002 which requires: “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, following engagement with Integrated Care Partnerships.”</p>		
11.2		<p>Any contractor engaged in the in the construction of the LTC should be required to become a supporter partner of Mates in Mind, which would help to ensure that best practice is followed across the project, consistent with CoCP Table 4.1 and the Highways England Environmental Manager responsibilities to integrate with the Quality and Health, Safety, Security and Welfare (HSSW) team for ... a joint assurance focus. This approach should be pursued from the outset, including preparations for the enabling works stage.</p>	<p>The DCO does not contain specific requirements for workforce mental health such as membership of Mates in Mind.</p>	<p>The National Highways Contracts have a requirement for the Contractor to obtain membership and registration to a scheme such as Mates in Mind.</p>	<p>No further action is proposed to respond to this recommendation.</p>
11.3		<p>The current scheme design should be reviewed in terms of whether it has incorporated adequate measures to reduce the risk of suicide during the construction and</p>		<p>National Highways has existing standards and toolkits relating to eliminating and mitigation suicide risk through</p>	<p>No further action is proposed to respond to this recommendation.</p>

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		operational phases, in particular having regard to the Public Health England document Preventing Suicide in Public Places. Any deficiencies in this regard should be reflected in changes to the preliminary design where these would require changes to the description of the authorised Works, the General Arrangement Drawings, the CoCP or requires additional land		design which the Contractor is required to adopt in developing the detailed design. 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.	
11.4		In addition, further guidance for including suicide prevention measures through development of the detailed design should be included in the Design Principles. This would ensure that all aspects of the detailed design - such as bridges, landscape boundary enclosures, and fencing of public rights of way – address the need for suicide prevention measures.		National Highways has existing standards and toolkits relating to eliminating and mitigation suicide risk through design which the Contractor is required to adopt in developing the detailed design. 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.	<p>ACTION 16: National Highways to add an additional Design Principle requiring the adoption of existing National Highways standards and toolkits in assessing suicide risk during detailed design for the operation of the Project as follows:</p> <p>The detailed design process for the highways forming part of the strategic road network or local</p>

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				<p>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.</p>	<p>road network must consider the incorporation of measures, such as enhanced parapets on high-risk structures, so far as is reasonably practicable to reduce the risk of suicides in accordance with the National Highways Suicide Prevention Strategy (or any substituted version of that strategy published by National Highways). The emergency services will be consulted on the proposed measures as part of the detail design process.</p>
Future threats					
12.1		<p>The scheme documents should provide a commitment to ensuring emergency services communications coverage (including forthcoming transfer from Airwave to the new Emergency Services Network) along the entire route and in the tunnel in terms of mast provision and secure protection, cabling, RVPs and possible emergency service hubs.</p>	<p>The CoCP [APP-336] requires in para 6.9.3 for emergency radio channels to be reserved and compatible with those used by Emergency Services – defined in the CoCP as the ‘blue-light services’ Kent Police, Kent Fire and Rescue, Essex Police, East of England Ambulance Service, Essex County Fire and Rescue, Southeast Coast Ambulance Service, Metropolitan Police, London Fire Brigade and London Ambulance Service.</p>		<p>No further action is proposed to respond to this recommendation.</p>

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			<p>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. National Highways will continue to liaise with emergency services to ensure communication requirements within the tunnel are compatible with the changing technology throughout the length of the Project Road.</p>		
12.2		<p>A clear statement should be made regarding which of the major developments planned for the area of influence for the LTC have been taken into account when assessing the effects of the project through the construction and operational phases.</p>	<p>The DCO application includes a document titled Interrelationship with other Nationally Significant Infrastructure Projects and Major Development Schemes [APP-550] which details the interrelationship between National Highways and other major developments.</p>		<p>No further action is proposed to respond to this recommendation.</p>
12.3		<p>A five-yearly review of the impacts of the LTC 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.</p>	<p>There are no provisions within the dDCO requiring a five year review of impacts on emergency services.</p>	<p>National Highways internal policies require the review of the project at 1 and 5 years post opening as part of the Post Opening Project Evaluation (POPE) review process. The POPE review relates to operational performance and safety on the network which could be used to facilitate a review. National Highways does not propose a</p>	<p>No further action is proposed to respond to this recommendation.</p>

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				specific review of impacts on emergency services but will continue to engage with Emergency Services through existing National Highways operational forums to discuss concerns during the operational phase of the project.	