

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

**Submission for Examination Deadline 9  
– 15 December 2023**

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

**Interested Party Number - 20035777**

**Comments on Applicant's  
submissions at D8**

## Introduction

1. This submission on behalf of the Emergency Services and Safety Partners Steering Group (ESSP SG) is in relation to material submitted by the Applicant on the topic of the proposed emergency service RendezVous Point (RVP) to the north of the River Thames. At Deadline 8, the Applicant submitted, among other things, the following documents:
  - Draft Development Consent Order v10.0 ([REP8-007](#))
  - Design Principles v6.0 ([REP8-081](#))
  - Stakeholder Actions and Commitments Register v6.0 ([REP8-089](#))

## Background

2. As the Examining Authority will already be aware, the ESSP SG has long been concerned about the approach of the Applicant towards the provision of emergency service RVPs for the Lower Thames Crossing scheme. In September 2021 the ESSP SG made submissions to the Applicant, including detailed advice on RVPs, with the following recommendations (see Annex C of the Draft Agreed Statement of Common Ground between (1) National Highways and (2) Emergency Services and Safety Partnership Steering Group (ESSP SG) v2.0 ([REP6-061](#)). Those submissions to the Applicant included the following recommendations:

### **Recommendation 6.1**

The preliminary design should be amended to reflect the acknowledged need for Emergency Services Rendez Vous 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.

### **Recommendation 6.2**

Consideration should be given to whether sufficient and suitable land has been secured for RVP, particularly in relation to the tunnel portals.

### **Recommendation 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.

3. In March 2022 ESSP SG made further recommendations to the Applicant in relation to draft proposals for RVPs (see Annex B of ESSP Deadline 1 submission – Written Representation Annex B: Rendez Vous Point Recommendations 9 March 2022 ([REP1-339](#))). ESSP SG made it clear in March 2022 that it did not accept the proposals for the RVP at the northern portal. Despite this, the proposals for the northern portal RVP were unaltered in the submitted scheme. Therefore ESSP SG has objected to that element of the proposals (see for instance section B of ESSP Deadline 1 submission – Written Representation ([REP1-338](#)), starting on page 8).
4. Discussions have taken place with the Applicant, seeking to find a suitable alternative RVP north of the River Thames. As reported at paragraph 13 on page 5 in section D of ESSP SG Written Representation to Deadline 7 ([REP7-273](#)), a possible alternative location to the south

of Muckingford Road has been discussed. The alternative RVP proposal is contained in Appendix A to this submission.

### **Current Scheme - Authorised Proposals and Preliminary Design**

5. At the time of writing this submission, the Draft Development Consent Order v10.0 ([REP8-007](#)) (dDCO) submitted by the Applicant includes the following in relation to RVPs:

Schedule 1 Work No. 3 –

*‘Work No. 3F –as shown on sheet 13 of the works plans and being the construction of a new rendezvous point for the new A122 Lower Thames Crossing south portal (Work No. 3C).’*

Schedule 1 Work No.5 –

*‘Work No. 5A –as shown on sheets 16 and 20 of the works plans and being the construction of the new A122 Lower Thames Crossing north portal and tunnel approach, to include—*

*(ix) the construction of a new rendezvous emergency area.’*

6. In relation to Work No. 5A(ix), the RVP north of the River Thames is shown as a grey oblong shaped area on General Arrangement Plans Volume B (sheets 1 to 20) v4.0 Sheet 20 ([REP7-027](#)). The Design Principles v6.0 ([REP8-081](#)) includes the following:

*S9.21 – Emergency Services Rendezvous Point (RVP) - The detailed design and layout of any RVP area (whether in accordance with SACR-021 or otherwise) will be developed in consultation with the emergency services. (page 59)*

*S10.16 - Emergency Services Rendezvous Point (RVP) - The detailed design and layout of any RVP area (whether in accordance with SACR-021 or otherwise) will be developed in consultation with the emergency services. (page 64)*

7. By virtue of Requirement 3 in Schedule 2 to the Draft Development Consent Order v10.0 ([REP8-007](#)), the Project must be designed in detail and carried out in accordance with:

- the preliminary scheme design – which would include the RVP referred to in Work No.5A(ix) and shown on General Arrangement Plans Volume B (sheets 1 to 20) v4.0 Sheet 20 ([REP7-027](#))
- Design Principles v6.0 ([REP8-081](#)) S9.21 and S10.16

*‘... unless otherwise agreed in writing by the Secretary of State following consultation by the undertaker with the relevant planning authority ... .. provided that the Secretary of State is satisfied that any amendments to those documents showing departures from the preliminary scheme design would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement.’*

### **Current Scheme - Stakeholder Actions and Commitments Register (SACR)**

8. Article 61 of the dDCO v10.0 ([REP8-007](#)) requires that:

*'(1) The undertaker must when carrying out the authorised development implement the measures contained in Parts 1 to 3 of the stakeholder actions and commitments register unless—*

*(a) otherwise agreed in writing with the person(s) with the benefit of the measure; or*

*(b) an application submitted by the undertaker for revocation, suspension or variation of the measure has been approved in writing by the Secretary of State, following consultation by the undertaker with the person(s) with the benefit of the measure and any other persons considered appropriate.*

*(2) The Secretary of State must when determining whether to approve a revocation, suspension or variation of a measure under paragraph (1)(b) consider the safe and expeditious delivery of the authorised development and whether— (a) the measure is capable of implementation; (b) the measure no longer serves a useful purpose; and (c) the purpose of the measure could be served equally well with any proposed revocation, suspension or variation.'*

9. SACR v6.0 ([REP8-089](#)) includes on page 17 the following:

**North Portal rendezvous point (RVP) – SACR-021**

*Adjacent to the A122 southbound carriageway, between 600m and 2,500m north of the North Portal National Highways will consult with the emergency services to identify a potential location for a northern RVP that is between 600m and 2,500m from the North Portal, which has direct access to the southbound A122 carriageway. Provided the design and location of that proposed RVP complies with DMRB CD 352, National Highways will use best endeavours to submit a planning application for an RVP in that location (provided that any steps are not inconsistent with the undertaker's licence granted under the Infrastructure Act 2015). In the event an alternative location has permission to be implemented prior to the construction of the proposed North Portal access track, the Applicant will implement that permission and not seek to acquire land or implement the proposed RVP adjacent to the proposed North Portal access track unless otherwise agreed with the emergency services (or, failing agreement, the Secretary of State).*

**ESSP SG Position and Concerns**

10. The ESSP SG position on the current scheme RVP north of the River Thames, (referred to as Work 5A(ix) of the dDCO ([REP8-007](#)) (dDCO); and shown on the preliminary scheme drawings, e.g. General Arrangement Plans Volume B (sheets 1 to 20) v4.0 Sheet 20 ([REP7-027](#))) is that it is unacceptable to the emergency services.
11. The ESSP SG position on the draft alternative RVP proposal contained in Appendix A to this submission is that it is, subject to further detailed design, acceptable in principle. This would be a drive on, drive off facility with five lanes to secure the muster of emergency services vehicles. The provision is 150m in length and 25m in width and is exactly what the ESSP SG have been requesting for a number of years.
12. However, the ESSP SG is very concerned that the Applicant has declined to change the preliminary design in order to:
  - a) remove the current RVP proposal near the north tunnel portal, and
  - b) refer to the alternative RVP in the dDCO and show it on and the scheme drawings.

13. Reliance on the SACR v6.0 ([REP8-089](#)) commitment SACR-021 to provide a suitable RVP (Appendix A of this submission) is not considered acceptable. There are considerable uncertainties associated with the preparation, submission, approval and implementation of a possible future planning application for the alternative RVP. The SACR-021 relies on the ‘... *best endeavours* ...’ of the Applicant. Such an application may or may not be granted and implemented.
14. This is not considered to adequately secure this important piece of emergency infrastructure through the DCO.
15. Indeed, there are potential conflicts and contradictions in the Applicant’s proposals. Despite the caveats in SACR v6.0 ([REP8-089](#)) commitment SACR-021:
  - the description of the Authorised Development in Schedule 1 of the dDCO would remain, including Work 5A(ix) in Schedule 2;
  - Requirement 3 in Schedule 2 to the draft Development Consent Order v10.0 ([REP8-007](#)) to design in detail and carry out the authorised development in accordance with General Arrangement Plans Volume B (sheets 1 to 20) v4.0 Sheet 20 ([REP7-027](#)) and Design Principles v6.0 ([REP8-081](#)) S9.21 and S10.16 would also remain.
16. ESSP SG asks the Examining Authority to carefully consider these conflicts, contradictions and uncertainties. If an acceptable RVP for the north of the Thames is not properly secured and delivered, then there is a real risk that the safety and security of the Project will be significantly undermined.
17. The ESSP SG’s position is that ideally a suitable RVP for the project to the north of the River Thames should be secured by removing references to the current RVP and replacing it with the alternative proposal shown in Appendix A of this submission. This would involve changes to the following documents:
  - a) revising the dDCO ([REP8-007](#)) to ensure that Work 5A(ix) of Schedule 2 refers to the alternative RVP proposal
  - b) changing sheet 20 of the Works Plans Volume B Composite (sheets 1 to 20) v5.0 ([REP7-039](#)) to remove the current RVP at the north tunnel portal and its Work No.5A label
  - c) amend Works Plans Volume C Composite (sheets 21 to 49) v6.0 ([REP7-041](#)) to show the alternative RVP on sheet 24
  - d) changing General Arrangement Plans Volume B (sheets 1 to 20) v4.0 Sheet 20 ([REP7-027](#)), to delete the current RVP at the north tunnel portal
  - e) amend General Arrangement Plans Volume C (sheets 21 to 49) v5.0 ([REP7-029](#)) to show the alternative RVP on sheet 24.
  - f) amend the Design Principles v6.0 ([REP8-081](#)) as follows:
 

~~S9.21 – Emergency Services Rendezvous Point (RVP) – The detailed design and layout of any RVP area (whether in accordance with SACR-021 or otherwise) will be developed in consultation with the emergency services.~~

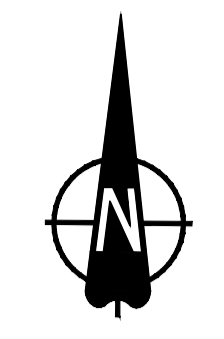
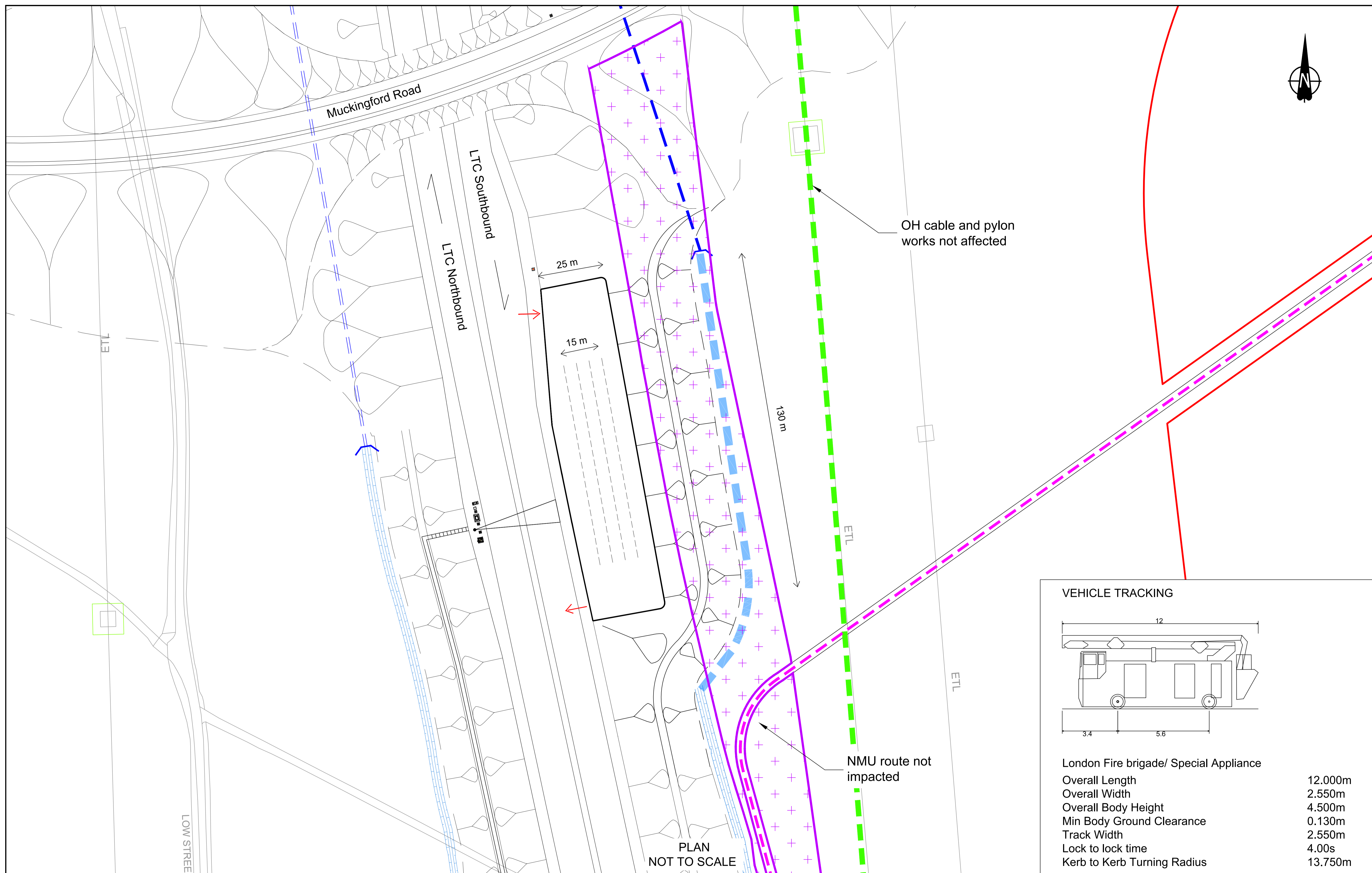
S10.16 - Emergency Services Rendezvous Point (RVP) - The detailed design and layout of any RVP area (whether in accordance with SACR-021 or otherwise) will be developed in consultation with the emergency services.

18. As a consequence, there would also be no need for commitment SACR-021 in SACR v6.0 ([REP8-089](#)), which could be deleted.

**Appendix A:**

**Alternative RVP  
proposal**





**VEHICLE TRACKING**

London Fire brigade/ Special Appliance	
Overall Length	12.000m
Overall Width	2.550m
Overall Body Height	4.500m
Min Body Ground Clearance	0.130m
Track Width	2.550m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	13.750m

P01.1	S0	18/10/2023	GC1	BB		
Rev	Status	Rev. Date	Purpose of revision	Drawn	Checked	Approved

**KEY**

	OS map		DCO proposed ditch		NMU route
	LTC proposed		Indicative ditch realignment		DCO proposed overhead
	Indicative RVP		DCO proposed culvert		Indicative culvert realignment
	DCO boundary				

Client

**LOWER THAMES CROSSING**

5th Floor Beaufort House  
15 St Botolph Street  
London EC3A 7DT

Project **LOWER THAMES CROSSING DEVELOPMENT PHASE**

Drawing title **RVP north portal Option 2.2**

Status	S0	Initial Status or WIP	Original Size	A1	Revision	P01.1
Scale						
Drawn	GC1		Date	18/10/2023		
Checked	BB		Date	18/10/2023		
Approved			Date	18/10/2023		
Drawing number	HE540039-CJV-HGN-S09_AC000000_-SK-CH-00002					