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Transport
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ME14 1XQ

Your Reference:
TR010032

Interested Party
Reference Number:
20035779

Date: 23rd July 2024

Dear Sir/Madam,

Planning Act 2008 and the Infrastructure Planning (Examination Procedure) Rules 2010

Application by National Highways (“the Applicant”) Seeking Development Consent for the Proposed Lower Thames Crossing Scheme

Request for comments from the Applicant, Natural England, The Crown Estate, and all other Interested Parties

Following publication of the Transport Infrastructure Planning Unit’s captioned letter dated 9th July 2024, KCC would like to comment on Points 8 & 9. These points concern the Applicant’s response to Paragraph 2 of the Secretary of State’s consultation [letter](#) of the 21st May 2024, and in particular, their [Annex A](#) Rest and Service Area Provision.

KCC has long been supportive of the Lower Thames Crossing (LTC) proposals, but we have always been concerned by the impacts of removing the A2 Cobham Rest and Service Area (RASA) as part of the Development Consent Order (DCO). Removal of this existing facility and not providing a replacement will put increasing pressure on the very few alternative facilities within the area. In addition, despite being the gateway to Europe, Kent already suffers from a lack of official heavy goods vehicle (HGV) parking spaces and removal of the A2 Cobham RASA will result in an increase in inappropriate HGV parking in residential areas.

More specifically, the comments we would like to raise in relation to National Highways’ response relate to:

- the reference made to the Department for Transport (DfT) Circular 01/2022
- the loss of HGV parking spaces
- the reference to HGV facilities at Swanscombe Peninsula

DfT Circular 01/2022

Firstly, Paragraph A.2.4 of the Applicant's response refers to Paragraphs 71 to 73 of the DfT Circular 01/2022, stating:

*"A.2.4. Paragraphs 71 to 73 of the DfT Circular 01/2022 set out important context for the provision of roadside facilities, stating that **'it is for the private sector to promote roadside facilities, although there may be a role for the company and local highway authorities to provide these where a need arises'**. The role of National Highways is to ensure that such facilities, promoted through the planning system, meet minimum requirements and can be accessed safely. Roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during their journey."*

However, KCC would dispute the Applicant's interpretation of the DfT's Circular 01/2022 as Paragraph 71 actually states:

*"**In most cases** it is for the private sector to promote roadside facilities, although there may be a role for the company and local highway authorities to provide these where a need arises."*

A project the size and scale of the LTC is clearly extraordinary, it will inevitably result in impacts that cannot simply be left to the private sector to mitigate. Any lost rest and service areas as a result of the scheme need to at the very least be replaced by the Applicant.

Paragraph A.2.3 of the Applicant's response makes the point that Paragraph 8 of DfT Circular 01/2022 acknowledges that its policies may be considered important and relevant to decisions on nationally significant infrastructure projects (NSIPs) in the absence of a stated position in the relevant national policy statement. KCC notes that the National Networks National Policy Statement (2014 or 2024) does not contain advice on the retention or removal of existing lorry parking facilities. We therefore refer to the Circular, namely Paragraph 80, for which the LTC Project appears to contradict the policy to retain existing truckstops (including closed facilities) where there is a need:

"80. It is recognised that on certain parts of the SRN and at certain times a shortage of parking facilities for HGVs can make it difficult for drivers to find safe space to stop and adhere to requirements for mandatory breaks and rests. To alleviate the shortage, the expansion of existing facilities on the SRN is likely to be needed alongside the creation of new parking sites. As a result, existing truckstops (including closed facilities) on or near to the SRN must be retained for their continued and future use unless it can be clearly demonstrated that a need no longer exists."

The Applicant acknowledges that the area around the A2 Cobham Services is an area of need for lorry parking facilities in Paragraph A.2.9. The need for the existing facilities (and indeed the closed facilities serving the opposite direction of traffic) is discussed further in our second section.



Loss of HGV Parking Spaces

Secondly, the Applicant's overall response implies the loss of HGV parking as a result of the removal of the A2 Cobham Services will be minimal. However, whilst there are 10 parking spaces at the existing A2 Cobham Services, a number of HGVs often take breaks on the A2 apron that used to serve A2 Cobham North Services. The loss of these unofficial spaces will add to the increasing demand for HGV parking and force HGV drivers to take breaks in inappropriate locations or residential areas.

Furthermore, the Applicant states in Paragraphs A.2.5 and A.2.6 that non-HGV drivers can use Tollgate Rest and Service Area; however, this is a small local service station and does not provide the same level of facilities compared to a typical RASA on the Strategic Road Network (SRN), for example the Moto Medway RASA further to the east on the M2 between junctions 4 and 5 which has 262 car parking spaces compared to Tollgate Services' nine spaces. There are also no dedicated HGV parking spaces at Tollgate, but HGVs often park on double yellow lines on the public highway. If the facilities (both official and unofficial) at the A2 Cobham Services are not replaced then this has the potential to increase the usage of Tollgate services with no mitigation for the implications on the local road network (LRN) in the immediate surrounding area of the junction with the SRN.

Alongside the loss of facilities, the Applicant does not appear to have considered the impact of drivers diverting off the SRN to use fuel services at Morrisons (Coldharbour Road) or Sainsbury's (Pepper Hill). HGVs already park on one of the access roads on the Sainsbury's site.

Each year KCC undertakes surveys into overnight lorry parking in Kent. These surveys are usually conducted over the months of June and September, with the intention to monitor the extent of HGV parking in the county and identify hot spots of inappropriate parking. Appendix A of this letter includes a map displaying the results of KCC's 2023 summer lorry parking survey in the vicinity of the existing A2 Cobham Services. Whilst it is accepted that Kent has a county wide HGV parking problem, it is important that consideration is given to the fact that the LTC has the potential to exacerbate the problem and currently this is completely unmitigated as part of the LTC proposals.

HGV Facilities at Swanscombe Peninsula

Thirdly, the Applicant's response refers to alternative HGV parking provision being available on the Swanscombe Peninsula in Paragraph A.2.10, yet no further details of these facilities are provided. The only HGV parking facilities that have been identified on the Swanscombe Peninsula are two unofficial sites operated by separate companies (United Truck Stop and Tovizi Transport):

<https://sites.google.com/huunitedlimited.com/www-huunitedlimited-com/home?pli=1>
<https://snapacc.com/map/site/13320/>

These sites appear to be located next to each other providing around 90 spaces. However, it must be clearly noted that these are unofficial facilities that do not have planning permission from the relevant local planning authority, Ebbsfleet Development Corporation.



Furthermore, access to these sites involves a diversion away from the SRN. If these facilities are being promoted by National Highways, then this poses an impact on KCC's LRN that has not been assessed and appropriately mitigated.

Summary

In summary, whilst KCC has long supported the need for a new Lower Thames Crossing and we hope development consent is granted, we have always been clear that the impacts of the proposals need to be appropriately mitigated for the scheme to be a success. Therefore, we would be grateful if the concerns raised in this letter could be considered as part of a decision being made on the outcome of National Highways' Development Consent Order application.

Yours faithfully,

Simon Jones

Corporate Director – Growth, Environment and Transport

