

**Gravesham Borough Council (IP Ref: 20035747)**

**Response to Secretary of State's 5th consultation on Lower Thames Crossing seeking comments from the Applicant, Natural England, Crown Estate and other interested Parties**

**Rest and Service Area Provision and a material change in circumstances since the close of the Examination in respect of the cessation of the Gravesend-Tilbury Ferry Service that may have implications for the determination of the application.**

**Introduction**

On 9 July 2024, the Secretary of State (SoS) issued a letter inviting comments from the Applicant, Natural England, Crown Estate and other interested parties on various issues. Amongst these were the following:

- Rest and Service Area Provision

This is a further consultation following on from National Highway's response to the question asked on the 21 May regarding the loss of Cobham South Services. Gravesham has concerns regarding the accuracy of that response and wishes to draw your attention to these concerns.

In addition, there has been a material change in circumstances since the close of the Examination in that the Gravesend-Tilbury passenger ferry service has ceased and this may have implications for the determination of the DCO application.

**Cobham South Services and alternative provision**

The SoS asked the applicant the following question at Consultation 4 on the 21 May 2024:

Rest and Service Area Provision

The Secretary of State notes that the Cobham Rest and Service Area (RASA) will be removed as part of the scheme, and the matters raised on this issue in the Statements of Common Ground between the Applicant and Thurrock Council and Kent County Council respectively.

The Secretary of State requests the Applicant provides further information on the impacts of the removal of the RASA from the proposed DCO; what mitigation, if any, is proposed to address these impacts; and compliance with the DfT Circular 01/2022.

The applicant responded by letter dated 29 May 2024, with a detailed exposition of their position set out in Annex A. The response has been published on-line [here](#).

Put simply, the applicant's position is:

- That they are not responsible directly for the provision of rest and service areas;
- That the Tollgate Services to the west of the Cobham South Services provides an alternative facility for car drivers;
- That a rest and service area on Swanscombe Peninsula provides an alternative facility for HGVs etc.; and
- The benefits of the scheme outweigh any harm caused by loss of the rest and service area.

Whilst Gravesham would defer to the views of Kent County Council, as local highway authority, on the adequacy of the applicant's position, several concerns remain. In particular:

- The applicant has conceded that there is an identified shortage of HGV parking and service provision in the area and the loss of Cobham South Services would exacerbate existing problems;
- Whilst the Tollgate Services does provide an alternative for car drivers, it is a small facility and has no HGV parking – which the applicant accepts. However, it still attracts HGVs that park on double yellow lines on the highway leading to it. The loss of Cobham South Services is likely to increase such pressure at this location and elsewhere within the urban area, with detrimental impacts to the local highway network; and
- The applicant has not identified the site and precise location of the alternative rest and service area for HGVs on Swanscombe Peninsula and its status is unclear – i.e. whether it requires or benefits from a grant of planning permission.

Our understanding is that the applicant may be referring to the site publicised on-line at this [website](#). This lies a considerable distance from the A2 and involves HGVs travelling via the local highway network, part of which is designated as the London Road Air Quality Management Area ([Dartford AQMA 2](#)).

The site lies within the Dartford Borough Council area and where the Ebbsfleet Development Corporation has responsibilities for development control and enforcement. Gravesham has therefore asked them to investigate and come to a view on whether the use is authorised. Whilst the Ebbsfleet Development Corporation are investigating the matter, their initial response has been that the use would not appear to benefit from planning permission.

Gravesham's position is that should the conclusion be reached that the use is unauthorised and requires planning permission, it should be disregarded by the applicant in responding to the SoS's question regarding the provision of rest and service areas.

### **Cessation of the Gravesend-Tilbury Passenger Ferry Service**

The Gravesend-Tilbury passenger ferry was subsidised jointly by Thurrock Council and Kent County Council. However, due to issues over funding and the ability to identify an operator to provide the service over the short term whilst alternative options were considered, the ferry was withdrawn on 1 April 2024. At the current time, there is no guarantee that the service will be reinstated or when. Further details are available on the Kent County Council website [here](#).

Whilst Gravesham made representations during the Examination on whether Lower Thames Crossing could assist in the delivery of improvements to the ferry service as the only alternative means of crossing the river in our area by non-motorised users (see [REP9A-050](#) Final Statement of Common Ground and [REP9A-106](#) Final PADS) this point was not conceded by the applicant.

However, it is not the purpose of this representation to rehearse this argument, rather to draw to the SoS's attention the requirements of Article 11 of the draft Development Consent Order ([REP10-005](#)) and its relation to the Framework Construction Travel Plan (FCTP [REP9-234](#)) as a control document and any subsequent Site Specific Travel Plans (SSTP) based upon it.

Schedule 2, Part 1, Requirement 11 to the draft Development Consent Order states:

### **Construction travel plans**

11. (1) No part of the authorised development is to commence until a travel plan for the construction of that part which is substantially in accordance with the framework construction travel plan has been submitted to and approved in writing by the Secretary of State, following consultation by the undertaker with the relevant local highway authority and where different, the relevant planning authority on matters related to its function.
- (2) The authorised development must be carried out in accordance with the construction travel plan referred to in sub-paragraph (1).

The Framework Construction Travel Plan states (amongst other things):

6.4.4 A shuttle bus service from the Gravesend hub would serve the Gravesend ferry pier and a shuttle bus service from the Grays hub would serve the Tilbury ferry pier.

### **River network**

6.4.10 A regular ferry service operated by Jetstream Tours runs from Monday to Saturday between Tilbury riverside and Gravesend. Tilbury sailings are to and from the Tilbury Riverside pontoon, off Ferry Road, Tilbury. On the Gravesend side, sailings are to and from the Town Pier.

6.4.11 Crossings take between five and 10 minutes depending on river traffic and run from both sides approximately every 30 to 60 minutes between 05:40 and 19:10 (correct as of 15 July 2022).

6.4.12 In addition, there are aspirations to run scheduled Uber boat by Thames Clippers services from the Town Pier in Gravesend into central London.

6.4.20 At Gravesend, south of the river, the indicative catchment extends to Dartford to the west; south of the A2; and across to Higham in the east. There is also a small catchment opportunity to the north of the River Thames in Tilbury as a result of the ferry service available. Similarly to the cycle network, bus services comprise a number of towns and suburban areas situated in the wider vicinity of the hub locations, extending a slightly greater distance of approximately 10km in some instances.

Given the potential use of the ferry is intrinsic to the Framework Construction Travel Plan as examined and the only alternative is now to use the Dartford Crossing (road) some 11 km to the west, the SoS may wish to consider the implications of this material change in circumstances and how it might be addressed.



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