

Shorne Parish Council

————— Borough of Gravesham —————



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Nuralite Industrial Estate Canal Road Higham Rochester Kent ME3 7JA

REVISED/ADDITIONAL INFORMATION The proposal is for the systematic redevelopment of the existing Nuralite site. This includes the importation of inert materials to cap, and landscape the historic asbestos landfill, thus containing its contamination risk. To demolish the existing buildings of the Nuralite industrial estate, deal with existing contamination, both through capping and removal of areas of hydrocarbon pollution, the laying of new service and utility infrastructure and the construction of 11 new purpose built light industrial type units and a site office.

This letter provides comments from Shorne Parish Council only on the revised/supplementary documents that the applicant has submitted in October 2020. **The representations that we previously made in July 2019 remain valid and both that and this present submission should be read in conjunction with each other.**

The applicant has submitted six supplementary/updated documents.

1) Revised - Habitats Regulations Assessment 2020 Update:

- **Altered configuration of Canal Road:** The latest version of the proposals include changes to the configuration of Canal Road. These works will impact on the SSSI designated area of Beckley Hill and particularly on the Ramsar site as that lies to the north of the entrance and on one or both sides of Canal Road. That aspect has not been included in the evaluation.
- **Deficient Map:** The map at Appendix 1 does not include the SSSI classified land at Beckley Hill, to the immediate east of the site entrance.
- **Hydrological assessments:** We do not believe the hydrological assessments in Table 1 to be correct. The whole marshes area is interconnected hydrologically through complex ditch and drain patterns, and the proposals include excess water from the site draining into the canal and thence overflowing further into the marshes.
- **Activities on-site:** In the section describing the development there is reference to “.....waste recycling centre, soil and stone processing centre.....”. We do not recall these activities being mentioned previously, and they raise additional concern over greater air and noise pollution.

- **Canal Remediation:** We are uncertain whether there have been any changes to the land profiles etc proposed and detailed in the other Appendices but we would anyway like to see considerably greater remediation of the canal.

2) Revised - Nuralite Water Vole Survey Report:

- **Previous damage:** Conditions of the southern bank and the canal bed itself have previously been altered by the actions of the applicant and predecessors.
- **Recolonisation potential:** If the canal was to be properly remediated then water voles might colonise the canal again from other local habitats.

3) Revised - Wintering bird survey Nuralite Industrial Estate:

- **Validity of surveys:** As described before, the western part of the site was previously bulldozed by the applicant so the then existing habitat was destroyed. Therefore the surveys are not representative of the less recent conditions of the site.
- **Limited recovery to date will be re-zeroed:** There has however already been some recovery, as evidenced in the survey by the presence of birds on the “red” and “Amber” lists but the site will again be stripped of all habitat by the process of building new industrial units and capping of the western part of the site.
- **Replanting:** It is to be hoped that subsequent replanting might eventually enable recovery to at least the original, and hopefully perhaps an improved state.
- **Nesting boxes:** The recommendation for nesting boxes to be installed on the new buildings is noted however it cannot be predicted as to whether the new range of activities to be undertaken on the site will encourage or discourage their use.
- **Within-site landscaping:** There needs to be significant landscaping and plantings installed and maintained within the industrial part of the site, particularly at the southern border.

4) Revised - Construction Management Plan:

- **Transfer of goods between vehicles:** Vehicles destined for the Apex site but taller than the railway bridge height limit of 4.1m should not be allowed to offload onto other smaller vehicles on Canal Road if this will cause obstruction.
- **Safety along whole of Canal Road:** Safety measures for pedestrians and cyclists need to be instituted for the entire length of Canal Road.
- **Warnings about cyclists and pedestrians:** The Road Safety Initiative needs to include warnings about cyclists and pedestrians, especially near the site entrance, and particularly for any over-height vehicles turning at the Network Rail entrance due to the co-location there of Footpath NS156.
- **Opening hours start too early:** The proposed opening hours for construction begin too early (06.00), this should be 07.00 or later, and vehicles should not be entering Canal Road to wait prior to the opening time.
- **Impact of increased traffic:** The proposed increase in traffic including HGV’s will have an unbearable impact on local residents.
- **One-way traffic system:** There is discussion about having a one-way system temporarily for HGV’s using Gore Green Road. In our view, this would need to be implemented for all traffic

and to be permanent in order to ensure traffic and public safety. The turn from Gore Green Road onto Lower Rochester Road is already “blind” and therefore dangerous, and will be more so with additional traffic, particularly HGV’s, using the Lower Rochester Road. This would however be an inconvenience to local residents.

- **Turning onto the B2000:** We remain concerned about the large increase in the number of turning movements, including during construction by heavy, and therefore slow-moving, HGV’s, from Gore Green Road turning right onto the B2000.
- **Passing places:** There is discussion about creating passing places on local roads however in many of these the amount of verge available, particularly in Gore Green Road, is either inadequate or non-existent without land being purchased. These could also negatively impact on local amenity. (See also under Revised Transport Assessment below).
- **Suitability for heavy vehicles:** We would also question whether local roads are structurally suitable for use by very heavy HGV’s, and who would be responsible for consequent repairs.
- **Security gate at entrance:** A security gate is now mentioned however this was not shown on the previously submitted plans.
- **Wheel-washing:** On-site wheel washing facilities must not lead to contamination run-off.

5) Revised - Transport Assessment:

- **Chequers area:** The proposed alterations to the Chequers area have been commented on previously in detail, we remain concerned about the overall unsuitability.
- **Urbanisation:** Regarding this change and those proposed to provide passing places and one-way systems and associated signage, overall we are concerned about the degree of urbanisation that will be imposed on local residents and the Conservation Area.
- **Traffic volume increases:** The proposals result in a predicted more than quadrupling of traffic volumes and particularly of HGV’s, these volumes and types of vehicles will have a significant detrimental effect on the safety of local roads and the lives of local residents. We disagree with the applicant’s conclusion that “The resulting impact of the proposed development is not predicted to have a significant adverse effect on the on the operation of the local highway network...”. The increase in traffic levels will also depend on the nature of the businesses occupying the individual units so is likely to be greater than predicted.
- **Adequacy of turning space before railway bridge:** We are not convinced that there is enough space for larger HGV’s to turn in the Network Rail entrance. On-going availability and permission to use this area is not guaranteed so cannot be relied upon.
- **Accident analysis:** Analysis over a longer time frame reveals more accidents, one fatal (in November 2000) on Gore Green Road. It is obvious that more traffic will lead to more accidents occurring as there will be greater opportunity for conflict between vehicles and between vehicles and cyclists.
- **Widening Canal Road into the Ramsar Site:** The proposals widen Canal Road and add a footway north of the Railway Bridge however the land on each side of the road here is part of the Ramsar Site and SSSI so we would question as to whether the road can actually be widened etc.
- **Location and type of footway:** Any pedestrian footway would be better on the north side rather than the south. A crossing point should be provided south of the Railway Bridge in relation to Footpath NS156 and an all-weather footway provided continuously from there to

the Apex entrance. The structure of the footway should reflect the rural and specially protected natures of the area rather than creating an urban appearance.

- **Chequers mini-roundabout:** The mini-roundabout area needs to also facilitate traffic moving from Church Road to Canal Road, unless this traffic is instead to be compelled to circumnavigate the roundabout.
- **Displaced resident's parking:** The issue of where displaced resident parking will be located, and the impact of this on the proposals and on road safety, has still not been addressed.
- **Additional signage:** The proposed additional "low bridge" signage is appreciated.
- **Options for rail transport:** The options for using rail to transport incoming and outgoing waste materials have not yet been adequately explored.
- **Passing places:** Regarding passing places (see also under Construction management plan above), these would need to be maintained as available, i.e. checked for fly-tipping several times per day and cleared immediately if found to be compromised. Responsibility for this needs to be assigned.

6) Revised - Travel Plan:

- **Aims etc vs reality:** Aims, targets and potential for non-vehicular modes of access are not the same thing as the reality of what will actually happen. Likewise, "..... best endeavours" to control operational HGV movements....." do not ensure compliance.
- **Access route:** The point remains that all practical access to the site is by road, via Canal Road and therefore through Lower Higham residential and Conservation Areas.

Summary:

We continue to object to the proposal to expand the footprint of the industrial area beyond the official/original footprint, and that objection also applies to several large hardstanding areas which have already been laid out and brought into use without planning permission. We also object to the proposed impacts on the historic Thames and Medway Canal and the Lower Higham area.

We remain unconvinced that the importation of materials in the quantity described is actually needed to remediate the western part of the site which is not going to be further disturbed. We would like to see an independent opinion regarding the minimum requirement.

Among other issues, aspects such as supplies of potable water and electricity, and the safe management of foul and surface water drainage remain inadequately addressed.

The revised/supplementary documents submitted by the applicant have not altered our views that due to the location the proposals are not, and cannot be made to be, suitable.

*Planning and Highways Committee,
Shorne Parish Council*