

FURTHER COMMENT FROM HIGHAM PARISH COUNCIL REGARDING APPLICATION NUMBER 20190290 – NURALITE SITE.

20190290: 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.

Response to further Highways and Transport information made available on GBC website

We refer to the above application and our previous response. Since then, we have become aware of further correspondence between Highways England and RSK, the Applicant's transport/highways consultants. We are disappointed that none of our highways issues seem to have been addressed, indeed it appears that more traffic will be directed past the school and through the centre of the village than set out in their document dated 20 January 2020 (although only made available on 29 September 2020). Further, not all of the responses from RSK have been made publicly available and we would ask that you send us a copy of document 661792-TN06-Rev00, which is referred to in both Highways England's email response dated 19 November 2020 and RSK's further response dated 24 November 2020 (published 25 November).

The flow diagram attached to the last document suggests that an additional 701 vehicles a day will use Chequers Street with 147 of these driving through the village to reach the A226 and thence the A289 and the M2/A2. In addition, an unspecified proportion, which based on current observed traffic movements, we would estimate to be over 50%, will also drive through the village to go to Strood, Rochester and Chatham.

Neither the traffic assessments nor the environmental assessments consider the effect of the increase in traffic with the resultant increase in pollution on the air quality in the village nor in the vicinity of the school. RSK also prepared the Environmental Statement which does not seem to take into account the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, nor the subsequent decision of the Court of Appeal in *Gladman v Secretary of State for Communities and Local Government*, *Swale Borough Council and CPRE Kent*.

Residents at the junction of Canal Road and Chequers Street already suffer from pollution and noise and the proposals and revised information do nothing to address this, instead they assert that "It should be acknowledged that the application and accompanying transport documents have been

scrutinised and discussed at length with both Kent County Council (KCC) and Gravesham Borough Council (GBC), with agreement reached on all transport aspects.”, which, if true, we find both surprising and disappointing.

Nothing provided by the Applicant and its advisers has addressed our fundamental issues concerning the proposed redevelopment, enlargement and intensification of this site and the consequent unacceptable increase in traffic on narrow rural roads or the roads through the village (which are of such a width that buses and other larger vehicles slow down to pass each other).

There has been no attempt to assess the detriment to health of those living in the village and the effect on the school.

We would also comment that on review of the plans for the modification of junction of Cheques Street with Lower Rochester Road, Church Street and Canal Road, the bus stop appears to have been removed from its location outside Telegraph Cottages and while the Transport Assessment states there are bus stops in Chequers Street, this is no longer the case for southbound vehicles as this bus stop has been declared unsafe and closed by KCC (and apparently will not be the case for northbound buses either, as the applicant is removing it).

In summary we do not believe that the revised information has addressed any of the concerns of this council; that the intensification of the use of the site and useable building area is unjustified and unwarranted and that the traffic generated will be to the great disadvantage of those living in Higham.

We request that you refuse consent for this inappropriate application.

HIGHAM PARISH COUNCIL

03.12.20