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Highways and Transportation

Ashford Highway Depot
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Tel: 03000 418181

Date: 1 December 2020

Application - GB/20190290

Location - Nuralite Industrial Estate, Canal Road, Higham, Rochester Kent

Proposal - 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.

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

The highway aspects of this application have been the subject of extensive discussions and correspondence at both pre-application and post-application stages. This has resulted in a comprehensive Transport Assessment being submitted in support of the application generated by RSK Transport Consultants dated January 2020 and subsequently modified as a result of those discussions. It is now considered to be a robust assessment and covers all the highway impacts of the development. It must be remembered that this is an existing industrial site so that whilst it is in an unsustainable location, transport wise, this needs to be taken into account in the assessment.

Traffic Generation

The proposal consists of several elements, each of which has an impact on the local highway network. Firstly, there is the need for approximately 500,000 tonnes of imported material to provide a capping layer to cover the old asbestos works. Secondly, the demolition of the existing industrial buildings on the site which will generate approximately 200,000 tonnes of material that will need to be exported from the site although it may be possible that some of this material could be used as a capping layer but for the purposes of the TA is assumed to be unsuitable. Thirdly there is the traffic generated by the construction of the new industrial buildings and finally the operational traffic from the new industrial estate. Since these four elements cover different time periods they have been combined where necessary to assess the

peak traffic generation for each of the first 3 years and for the separate operational generation subsequently and into the future.

An estimate of the traffic generated for the remediation, demolition and construction phases has been based on first principles according to the number of loads anticipated and number of operatives required – mainly HGVs plus cars used by operatives. The expected generation from the completed industrial buildings has been assessed on TRICS data for similar-sized developments in rural areas. This is considered to form a robust assessment. Traffic generation from the existing industrial premises has been taken into account (approximately 4,000 sq.m.) and has been deducted from the traffic generated from the proposed industrial development.

Current traffic flows along Canal Road have been measured using a ATC and are seen to be mainly light cars / vans with a low number of HGVs. These numbers have been added to the proposed traffic generation to provide an overall forecast of vehicle numbers travelling along Canal Road and onto the local highway network.

In summary, the daily flows of traffic generation for each of the remediation / demolition / construction elements over the first 3 years have been estimated as:

Year 1	142 HGVs	34 cars / vans	Remediation / Demolition
Year 2	204 HGVs	67 cars / vans	Remediation / Demolition / Construction
Year 3	150 HGVs	40 cars / vans	Remediation / Construction

These HGV numbers have been assumed to be equally distributed over a 10-hour day and it would need to be managed (via an appropriate Condition) to restrict those numbers and the spread over the day.

The existing flows along Canal Road taken from the survey have been added to the above additional traffic flows resulting in a peak flow of 70 vehicles per hour in Year 1, 92 vehicles per hour in Year 2, and 72 vehicles per hour in Year 3.

Once the remediation / demolition / construction phases are complete (after Year 3) it is estimated that at peak times a traffic generation of 145 vehicles per hour in the am and 151 vehicles in the pm with a minimum of 115 vehicles per hour with approximately 15% – 20% being HGVs. Daily traffic flows are estimated to be 848 arrivals (121 HGVs) and 873 departures (123 HGVs) over a 12 hour period (07:00 to 17:00).

All the above figures are clearly illustrated by way of graphs on pages iii and iv of the Transport Assessment.

The alternative option of using rail transport from the nearby rail sidings has been considered and investigated but has been found not to be economically viable and impractical. This is accepted and a full analysis is provided in Appendix 2 of the Transport Assessment.

Impact on Local Highway Network

The site is located in a rural area with the majority of the access roads comprising unlit, relatively narrow lanes without footways.

Canal Road, the only access to the site, is adopted as a public highway for the first 450 metres from its junction with Chequers Street, the remainder being a private road. The Highway Authority has no jurisdiction over the private section. However, within the adopted section there

is a pinch point just beyond the residential properties where HGVs would not be able to pass and land is not available for undertaking any widening. It is proposed that temporary traffic signals will be installed for the first 3 years of the works to manage alternate one-way working which is an acceptable solution to avoid queueing or more particularly, reversing by HGVs. There are concerns that this form of traffic control may also be necessary once operations start on the industrial development and this will need to be assessed at the end of the 3-year period for permanent signals. The Highway Authority is able to determine this and to implement any necessary charges as a result.

It is accepted that the local villages of Higham and Shorne are unsuitable for HGV movements and it has been agreed that a HGV routing agreement will be necessary during both the initial phases and in the future for HGVs to use alternative routes. Any vehicles travelling westward would be able to use Chalk Road to link with the A226 at Lion Roundabout since this road is sufficiently wide and with reasonable forward visibility.

It is proposed to introduce a one-way routing strategy for HGV vehicles travelling east using Lower Rochester Road westbound and Gore Green Road eastbound. Whilst it may be possible to implement a Traffic Regulation Order to control these one-way movements (investigation needed) it may also be controlled as part of a Construction Management Plan (Conditional on any consent granted) together with a requirement for all HGVs to be fitted with GPS tracking devices to ensure compliance and to check for any non-compliance. This has been used at other locations and is achievable.

Both Lower Rochester Road and Gore Green Road are relatively narrow (less than 4.0m in parts with lengths of poor forward visibility. Any vehicles meeting an HGV coming in the opposite direction would have difficulty passing and could result in lengthy reversing manoeuvres detrimental to highway safety. In order to overcome this concern, it is proposed to introduce additional surfaced passing places along both roads with a minimum road width of 5.5m and a length of 12m – sufficient to accommodate an HGV. Each passing place will need to be visible from the previous one. A survey of the roads has been undertaken to identify where passing places are required which appears achievable **provided** the passing places are within the existing adopted highway or on land available to the applicant. This needs to be further clarified by the applicant as sufficient information does not appear to be available and therefore would need to be covered by Condition. A suitable S278 / S38 Agreement with the HA would be required to adopt the new passing places.

Further mitigation works are being proposed at the Canal Road / Chequers Street / Church Street / Lower Rochester Road staggered junction in the form of a new mini roundabout. This will improve traffic flows and visibility to accommodate traffic movements at the junction. It has been the subject of a Stage 1 Road Safety Audit and is acceptable to the Highway Authority. The works are all within existing public highway and would be carried out under a Section 278 Agreement with the HA.

Assessment of road junctions in the area, when taking into account the additional traffic generated by the development, has shown that there are unlikely to be any congestion problems at these junctions.

Highway Safety

An analysis of the Crash Records has revealed only 2 sight injury crashes within the last 5 years up to 2019. There is therefore no significant highway safety record on the local roads in the vicinity of the development access.

Sustainability

The development site is located in a rural area with little opportunity for sustainable transport. The nearest railway station is at Higham at the junction of Chequers Street with Chalk Road. It is proposed to operate a mini-bus shuttle service between the industrial development and Higham station. Given the considerable walking distance (1.7 km.) along Canal Road and the station this is considered to be a feasible alternative to the use of the private car by employees of the new industrial units. Final details of the shuttle service will need to be submitted and approved by the LPA prior to first occupation.

Bus services are available in Chequers Street but the distance to the development plus the infrequent / poorly timed service is not considered to be a viable option.

Cycling is an alternative option, particularly between the development and Higham Station. It is proposed that cycle parking at the station will be enhanced at the station (subject to South-Eastern approval) which would hopefully encourage industrial site employees to make a combined rail / cycle journey. NCR1 cycle route passes the site immediately to the north. Cycle parking is proposed within the new development.

The above provisions should be supported by a Travel Plan both for the initial phases and the completed industrial development. The TPs shall be required to be submitted and approved by the LPA prior to any works commencing for the remediation / demolition / construction phase (could be included in a Construction Management Plan) and prior to first occupation of any of the industrial units on the site.

Car / Van / HGV Parking

Since the distance between the development site and the nearest public highway is considerable, the impact of insufficient parking on the site is not considered to be a matter for consideration by the Highway Authority. The Local Planning Authority may wish to consider the parking provision against their own published parking standards.

Conclusions

In summary, whilst there are concerns regarding the levels of traffic movements in a rural location and accessed by narrow lanes, provided the mitigating road measures are undertaken as described above, it is not considered appropriate or sustainable to raise an objection to the proposals and therefore no objection is raised by the Highway Authority provided that the following issues are covered by an appropriately worded and enforceable Condition:

- 1 The road improvement works at the Canal Road / Chequers Street / Church Street / Lower Rochester Road junction generally in accordance with RSK drawing ref. 661792/02A shall be completed under a Section 278 Agreement with the Highway Authority prior to any works commencing.

- 2 The construction of additional passing places along Lower Rochester Road and Gore Green Road shall be completed generally in accordance with RSK Drawing Ref. 661792-10-04B prior to any works on the site commencing and with the agreement of details with the Highway Authority.
- 3 A final Construction Management Plan shall be submitted to and approved by the LPA in co-ordination with the Highway Authority prior to any works commencing. Such a plan shall be generally in accordance with the submitted details included in the Transport Assessment submitted as a supporting document to the application and shall include details of maximum HGV numbers both daily and hourly and HGV routing together with a requirement for a GPS tracking system covering all construction vehicles.
- 4 A lorry routing agreement for HGV vehicles travelling to and from the proposed industrial units shall be entered into and enforced by the LPA in conjunction with the HA prior to first occupation of the industrial units on the site. No HGV traffic shall be permitted to travel through the villages of Higham and Shorne.
- 5 A system of traffic signal control shall be installed along the narrow section of Canal Road to enable one-way working, details and location to be agreed by the LPA in conjunction with the HA prior to any works commencing for a duration to be agreed.
- 6 A Travel Plan shall be submitted to and agreed by the LPA prior to any industrial units coming into use and shall include details of enhanced cycle parking at Higham Station and details of a shuttle bus between the development site and Higham Station to be operated for a period of at least 3 years from commencement of its operation.
- 7 Locations and details of EV charging points within the industrial site shall be submitted to and approved by the LPA and installed prior to first occupation.

INFORMATIVE: It is the responsibility of the applicant to ensure , before the development hereby approved is commenced, that all necessary highway approvals and consents where required are obtained and that the limits of highway boundary are clearly established in order to avoid any enforcement action being taken by the Highway Authority.

Across the county there are pieces of land next to private homes and gardens that do not look like roads or pavements but are actually part of the road. This is called 'highway land'. Some of this land is owned by The Kent County Council (KCC) whilst some are owned by third party owners. Irrespective of the ownership, this land may have 'highway rights' over the topsoil. Information about how to clarify the highway boundary can be found at <https://www.kent.gov.uk/roads-and-travel/what-we-look-after/highway-land/highway-boundary-enquiries>

The applicant must also ensure that the details shown on the approved plans agree in every aspect with those approved under such legislation and common law. It is therefore important for the applicant to contact KCC Highways and Transportation to progress this aspect of the works prior to commencement on site.

Yours faithfully

David Barton
Senior Development Planner