

Shorne Parish Council

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13th July 2026.

Application Ref: 20260521

Nuralite Industrial Estate Canal Road Higham Rochester Kent ME3 7JA

Application for approval of condition 2, 5, 8, 9, 11 and 12 attached to planning permission reference number 20250721 relating to full details of the road improvements works at the Canal Road / Chequers Street / Church Street /Lower Rochester Road junction (2), full details of the phasing of the development (5), a comprehensive Demolition and Construction Logistics Plan covering all environmental impacts (8), a full Construction Traffic Management Plan (9), an updated preliminary ecological appraisal and review and of the site wide mitigation strategy (11) and a strategy to deal with the potential risks associated with any contamination of the site or the relevant phase (12).

The Nuralite site has its entrance and road access in Higham but the bulk of the actual site lies in Shorne.

The Parish Council examined the original application in 2019 very carefully and submitted detailed representations, and we have also submitted responses to more recent applications. We will not revisit previous responses generally as they are on record, excepting relevant topics raised by this present application.

The applicant seeks approval for six Conditions under ref 20250721, and we have the following comments:

Condition 2:

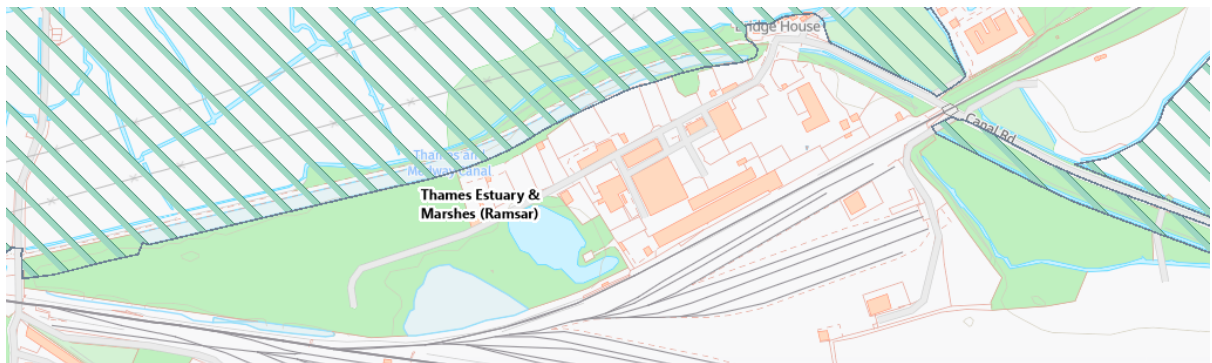
- While a Mini Roundabout Floor Plan has been submitted, the important question is about whether what is proposed is satisfactory.
- The proposed layout is detrimental to a Conservation Area, as is the additional signage needed, and removes/prevents roadside parking for a significant number of local residents without replacement provision. The likely result of parking relocation will be to make road

access on Canal Road even more hazardous than at present. The layout will still be difficult for large vehicles to negotiate, particularly exiting Canal Road without blocking the junction.

- This Condition is essentially interlinked to Condition 3 and others as all traffic Conditions need to be in place/satisfied before significant works can be commenced.

Condition 8:

- The Demolition and Construction Logistics document relates to this Condition.
- We have concerns about potential impacts on users of the footpath and national cycle route immediately to the north of the site.
- The document refers to the Nuralite site being adjacent to the SSSI and Ramsar site however the boundaries of the Ramsar site extend into the Nuralite site itself.
- Additionally, there is Ramsar land both sides of Canal Road south of the railway bridge (only to the east on the north side) and this will be impacted by vehicle movements.
- We do not consider that these aspects are adequately covered at present.



Extract from MAGIC Map showing Ramsar site boundaries

Condition 9:

- The Construction Traffic Management Plan refers.
- Local Parish Councils (Higham and Shorne) should be included in planning as they are also relevant stakeholders.
- The document is mostly about aspects internal to the site whereas we are more concerned about adverse impacts and traffic conflicts that may occur external to the site, including in relation to pedestrians and cyclists using the Canal towpath and Canal Road.
- The likely HGV vehicle movements will average 50 per hour, which is a very large number to be tolerated by local residents. The impact of the low bridge on these numbers has not presently been assessed, and it is also unknown whether Canal Road can structurally support the weights required.
- While there may be some control of HGV movements, vehicle movements by the up to 133 workers vehicles per day are not directed to use specific routes, and this may cause traffic difficulties for residents of areas further from the site that get used for through access. This should be reviewed as there could in fact be significant additional impact on amenity in those areas.
- Need for utilities/infrastructure to be laid along Canal Road has not yet been assessed.

- Turning away vehicles that arrive at the wrong time could increase journey numbers and traffic impacts. Lower Thames Crossing construction (and operation) will adversely effect journey times in the wider area so arrival times at the site could be unpredictable.
- Over-height vehicles turning in the Network Rail entrance will pose additional risks to pedestrians and cyclists.
- Overall conflicts with pedestrians and cyclists whose route takes them under the low and narrow railway bridge will be considerably increased, detailed proposals for segregation and protection are needed.

Condition 11:

- The Preliminary Environmental Assessment refers.
- This is a desk study.
- The document notes that area of hardstanding have been created in various parts of the site, replacing grassland (sections 1.8.7-1.8.9). On the northern boundary of Nuralite these adversely involve the Ramsar site (see map above and “Remediation” sections below).

Condition 12:

- The Remediation Options Appraisal refers.
- The report details various acts by owners of the Nuralite site which have previously caused and spread contamination, such as the bulldozing and uprooting of trees in the western part which led to buried asbestos deposits being brought to the surface.
- The risk from hydrocarbon deposits is noted, which potentially would further contaminate the Canal, and from that spread further into the Ramsar site and marshes ecosystem, and it is good that this soil will be removed.
- However, we remain concerned about contaminated water run-off during construction, and in the future during operation, from business and industrial processes that may be carried out on the site, plus the many associated vehicles. Any local measures against icy surfaces in winter would also pose a risk.

Canal remediation/restoration:

- The Canal immediately adjacent to Nuralite is, or should be, an important historical asset and wildlife habitat which is mostly part of the Ramsar site.
- We note that recent sampling for Asbestos fibres was negative in 9 out of 10 samples, and the only positive sample had only a very low level detected. These figures bode well for restoration possibilities.
- We understand that there are problems presently with the water level in the Canal not being maintained, so we are concerned to see proposals such as sheet piling and cutting back of the sides, which could further compromise the integrity and water retention ability of the Canal bed and banks.
- Similarly, the suggested use of gabion walls and reinforced soil lacks detail, and reasons are not given for the various suggestions.

- There needs to be involvement of key stakeholders, including the two Parish Councils, to review ongoing design development and detailed proposals for achievable remediation/restoration.

Proposed picnic site:

- The proposed picnic area lies on top of the Canal bed but is itself within the Ramsar site, which calls its appropriateness into question.
- An area north of the towpath has already been cleared by the Canal Association only a short distance away, so this proposed area is duplication.
- We questioned previously as to how, if it is to go ahead, the proposed area would be maintained and managed, especially as regards prevention of antisocial behaviour. An operational policy will be needed specifically for the picnic site.
- We also asked as to whether the picnic area would be connected to the business park by a route within the Nuralite site, it being preferable for there not to be any connection in order to prevent damage to the nature areas and security risks for the business units.
- Given the recent low Asbestos count findings it might be preferable to instead fully remediate this area, to include a water pipe connection to the adjacent canal section so as to equalise water levels.