

20260521 - Nuralite Industrial Estate

KCC Public Rights of Way

Thank you for your consultation regarding the above application.

I remain satisfied with the approach that we outlined in our correspondence of the 15th January, namely, that the applicant will be required to seek the creation of permissive Restricted Byway rights (presumably with a compensation payment to the landowner(s)) over the length of footpath NS148 that runs between NS155 and Lower Rochester Road, and also along the headland on the south side of Little Church Road between NS151 and Buckland Road, as this would ensure the safety of users of the public rights of way network.

Whilst I acknowledge that this would strictly be part of the temporary traffic regulation order consultations for the one-way system, it is somewhat disappointing to see no reference to this at all in the current consultation, or indeed any recognition of the negative impacts on the public rights of way network if these issues are not addressed and the potential dangers that could arise as a result.

Unless I have missed something, the Demolition and Construction Logistics Plan makes only the following references:-

3.7 - Traffic, Transport and Rights of Way

RSK completed a Construction Traffic Management Plan (CTMP) in April 2026 for the site. The remediation of the site will generate a large number of HGV movements. These will be routed via the proposed route as set below Section 4.10.2 and it is assumed that 100% of HGV movements associated with the site are assigned to this routing. At its peak, the busiest phase of the programme is expected to generate an average of 686 daily two-way trips, of which 420 are HGV trips associated with the remediation and redevelopment. The HGV trips have been distributed evenly across a 10-hour period, resulting in 42 two way HGV trips during each peak hour, or less than one per minute. It is not anticipated that any abnormal indivisible loads will be required.

This section acknowledges the scale of the impact of the access route but despite referencing 'Rights of Way' in the title, it makes no reference to them at all. I would have expected to see some comment on the potential dangers to users of the public rights of way network and how they would be mitigated within this heading, but there is nothing.

The above references section 4.10.2 as the details of the proposed HGV access routes but this section actually reads:-

4.10.2 - Storing and stockpiling of hydrocarbon contaminated soils

This should be corrected to reference section **5.11.2**, although this section also makes no reference to managing the safety of users of the public rights of way network.

The Construction Traffic Management Plan has the following sections, where it might be expected to find some reference to the public rights of way network, the impacts on it and the proposed mitigations:-

Section 2.2 – Considerations.

Section 5.1 – Vehicle routing.

Section 5.4 – Traffic management.

Section 5.9 – Impact on cyclists.

There is, again, no reference to the public rights of way network and the negative impacts and dangers to users at all.

I appreciate that this is an aspect of the traffic management that will be difficult to deal with effectively, and that it will be fully addressed at the application stage for the traffic regulation order but it should be noted that, if adequate mitigations are not put in place, the Public Rights of Way and Access Service will be objecting to the TTRO application.