

Dear Local Planning Authority (LPA),

We object to a planning application 20260521 at the Nuralite Industrial Estate, Canal Road, Higham, and ask Gravesham Borough Council not to approve the discharge of the conditions sought on the current evidence. It seeks to discharge conditions 2, 5, 8, 9, 11 and 12 attached to permission 20250721. We do not consider conditions 2, 5, 8, 9 and 11 ready for discharge on the current evidence, for the following reasons:

1. Condition 2 - highway details and displaced parking. Kent County Council Highways accepts the mini-roundabout in principle but identifies missing information on displaced parking, the affected bus stop, construction and surface finishes, street lighting and other details required by condition 2. It maintains a holding objection and says the condition should not be discharged until the further information is supplied. Displaced parking could also create unsafe or obstructive overspill parking on constrained village roads.

2. Conditions 8 and 9 - construction traffic, noise and public safety. The applicant's Demolition and Construction Logistics Plan predicts a +7.0 dB construction-traffic noise increase at Canal Road, categorised as a Major magnitude of impact. Important controls are still left to a future contractor or a "live" document. The Traffic Management Plan does not clearly set enforceable maximum daily and hourly HGV numbers or show GPS tracking for every construction vehicle. KCC Public Rights of Way also says the submitted material does not properly address dangers and impacts for users of the affected rights-of-way network.

3. Condition 11 - ecology and Habitats Regulations. KCC Ecology has expressly concluded that the information submitted is not sufficient to discharge condition 11, citing the need for an updated ecological mitigation strategy and unresolved bat and water-vole matters. The Environment Agency initially objected because the appraisal did not address ecological receptors in the adjacent canal, then changed its position on the basis of a future updated appraisal. Given the Thames Estuary and Marshes SPA, Gravesham must also complete any Habitats Regulations duties required before an approval which enables the project to proceed.

4. Environmental information, consultation and public participation. The parent redevelopment is Environmental Impact Assessment development. Gravesham should clearly record whether the existing environmental information is adequate for this later pre-commencement decision and obtain further information if required. The Environment Agency's revised ecology response refers to additional applicant information provided on 16 July 2026 which was not identified among the publicly available documents reviewed to date. Any substantive environmental information relied upon should be publicised or consulted on as legally required before determination.

5. Condition 5 - phasing and an up-to-date construction programme. The submitted sequence drawing placed discharge of planning conditions in approximately April to June 2026 and showed other activities on dates which have already passed, while application 20260521 remains undetermined. Gravesham should confirm that the programme is still current or require an updated sequence showing the actual and remaining phases.

6. Lawful commencement and the status of the permission. The original permission had to be begun by 23 December 2024. The 2023 planning history identified construction of a retaining wall as the intended material start, while the current application form states that development began on 1 September 2023 - the same date the relevant 2023 amendment was approved. Before relying on permission 20250721 as extant and implementable, the Council should place clear evidence on the record identifying what material operation was actually carried out, when it occurred and why it lawfully commenced the permission.

Overall conclusion. We remain fundamentally opposed to the Nuralite redevelopment and we object to application 20260521. These pre-commencement conditions are not administrative technicalities: they are important safeguards imposed because this major redevelopment raises serious issues concerning highway safety, prolonged construction disturbance and traffic, public safety, ecology and environmental protection. On the evidence currently available, important safeguards remain incomplete or unresolved, while there is also a serious unanswered question about whether the underlying permission was lawfully commenced and remains capable of implementation.

Consideration to inhabitants of Higham must be of paramount importance.

Thank you and kind regards,

[Redacted Signature]

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Date: 21 August 2026