

Reference:
UPRN: GB/20250721

Mrs Lisa Fisher
Planning Services
Gravesend Borough Council
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1 AU

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Application for removal of condition 4 ,6,12 and variation of condition 7 attached to 20190290 – relating to systematic redevelopment of the existing Nuralite site. This includes allowing the removal of passing places, temporary traffic controls, and implementation of a permanent TRO for all traffic

Dear Mrs Fisher,

Thank you for your notification as to the above application to vary this planning permission.

The original transport plan makes several positive references to the proximity of National Cycle Network Route 1 to the site, promoting it as an option for employee travel and reducing traffic movements and emissions. However, as it stands these proposals will substantially harm the safety of cycling in the area, and are likely to prompt the closure of this section of the route.

Lower Rochester Road currently carries National Cycle Route 1 (NCN1) between Higham and Rochester, providing a useful active travel alternative to both driving and the infrequent rural train and bus services. Gore Green Road carries National Cycle Route 179 (NCN179) which offers a less direct route via the Hoo peninsula, suitable for leisure cycling. The routes are regularly used by commuting and touring cyclists, including from overseas, and recent improvements to a nearby section of NCN1, funded by the Department for Transport, are attracting new users including disabled and family cyclists. Both these routes will be

significantly affected by these proposals, and no mention or consideration of this and the impact on these users has been made in any of the submitted documents.

Sustrans' experience is that one-way systems significantly increase average vehicle speeds and this is particularly noticeable on rural roads and where the one-way system is of significant length.

The Department for Transport's cycling design guidance LTN 1/20 states the key to reducing severity of collisions is reducing the speeds of motor vehicles so that they more closely match that of cyclists. By increasing vehicle speeds the proposed amendment of condition 7 runs counter to this guidance. Rural highway design also frequently implements forced give way points (e.g. at village gateways) as a mechanism to reduce vehicle speeds and again this proposal runs contrary to that.

In addition, due to the length of the one-way system, it is likely that there will be poor compliance by cyclists, plus cyclists may become lost or confused, in both case leading to cyclists going against the flow of traffic with no contraflow.

As it stands the scheme is likely to render these roads permanently unsuitable for use by cycles, severing both these routes with no viable prospect for diversion. In contrast, the passing place proposal, while imperfect and substandard for the expected increase in HGV volumes, represented an improvement for active travel in the area by bettering existing roads.

Before consideration is given to consenting the removal of condition 4, the developer must provide evidence of meaningful engagement with said private landowners, which should have included offers to purchase the land in question at a reasonable premium for dedication as public highway.

If the one-way system is to be progressed, measures must be implemented to ensure slow traffic speeds. These should include lowered speed limits to quietway standards enforced by speed humps, with the developer contributing to the ongoing maintenance of this infrastructure. These are already in use on Canal Road and are remarkably successful in reducing the vehicle speed, including HGVs, to a level which approaches acceptable levels for rural cycling.

Alternatively, the local authority could consider widening Lower Rochester Road using compulsory purchase powers, and closing Gore Green to through motor traffic.

Lastly, we note that rail freight was discounted for the import of the capping material due to the complexities of coordination and impact on economic viability of the project, however given this could offer a meaningful and lasting alternative to HGVs for construction and operation of this site, it feels like insufficient consideration has been given to this option.

The complexity of construction coordination should not be given greater weight than that of providing safe active travel routes, and the challenge of reducing carbon emissions which is a duty incumbent on all development.

Your sincerely

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