

# Nuralite Industrial Estate - Full Objection Report

## Application 20260521

Location: Canal Road / Chequers Street / Church Street / Lower Rochester Road  
Junction, Lower Higham

Date: June 2026

## 1. Executive Summary

This document provides a full, evidence-based objection to the discharge of Conditions **2, 5, 8, 9, 11 and 12** associated with planning permission **20250721** for the redevelopment of the Nuralite Industrial Estate.

The developer's own submitted documents confirm:

- **50 HGV movements per hour for three years.**
- All access roads are **narrow, single-track**, with **informal passing places**.
- The route is **“sensitive as it passes the frontage of residential properties.”**
- **500,000 tonnes** of imported material.
- No swept-path analysis for the junction redesign.
- No vibration modelling or structural risk assessment for properties built in 1800s.
- Ecological surveys are **incomplete**.
- Contamination assessments are **insufficient**.

These omissions mean the conditions **cannot legally be discharged**.

In addition, residents face **severe secondary impacts** not covered by the conditions but directly caused by the same scheme, including the **loss of parking, property devaluation**, and **severe disruption to daily lives**.

## 2. Planning Conditions Objection

### Condition 2 - Junction Redesign

- No swept-path analysis provided by the applicant.
- No Stage 1 Road Safety Audit provided by the applicant.
- Suggested kerb realignments and carriageway widening will bring HGVs closer to homes.
- Increased vibration, collision risk, and noise and dirt/dust:
  - Some of the properties on Chequers Street were built in the 1800s. They are structurally sensitive already, with residents already having to pin/stitch walls due to structural movement caused by HGV movements (this will get worse with the increased number expected). The kerb realignments and carriageway widening bring these HGVs closer to these properties, increasing the vibrations that will affect the structure of these properties. The properties on this street already shake when HGVs pass, and there is concern that they will not survive 50 HGV movements per hour, due to the constant structural stress this will put on the properties.
  - One property on Chequers Street has already had the front skim pulled off by a HGV accident. The kerb realignment and carriageway widening will only increase the likelihood of this recurring. There is also a higher collision risk with other road users (including cyclists, walkers, horse riders and other road users). There is also a higher risk of damage to parked cars in the parking spaces on canal road.
  - With 50 HGV movements per hour, the noise to local residents will be constant, meaning they cannot reasonably enjoy their homes, including their gardens.
  - Increased dirt/dust and pollution, both from the diesel particulates and asbestos, not only affects properties and vehicles in the area, but it is also a health concern.

### Condition 5 - Phasing Plan

- No HGV volumes per phase provided by the applicant.
- No peak-time restrictions. The 10-hour window will likely run through rush hour periods, which sees the roads busier, especially if there is an accident or other traffic jam on the A2, as drivers often use Lower Rochester Road as a cut through.

### Condition 8 - Demolition & Construction Logistics Plan

- No structural risk assessment for 1800s properties provided by the applicant.
- No vibration modelling or dust/asbestos risk modelling provided by the applicant.

### Condition 9 - Construction Traffic Management Plan

- The Plan Confirms 50 vehicle movements per hour for three years. This does not take into account the existing excessive amount of HGV movements and other large vehicle movements that residents are having to deal with already. How will the traffic management system cope with 50 HGV movements per hour, **on top of** existing Nuralite HGVs, steel works HGVs (Church Street), RS Skips HGVs (Chequers Street – Lower Rochester Road), Coaches (Canal Road) **as well as** local resident traffic including school traffic, Higham train station traffic, A2 overflow traffic and day-to-day residential traffic. Gravesham Borough Council plans include potential of 2,500 **MORE** houses in Higham. Has this increased traffic been considered? This construction would mean more HGVs using the same road of Lower Higham as not allowed through Upper Higham, as well as the increased residential traffic if those houses are built and occupied.
- There has also been a high volume of new building in Medway, including in Cliffe and Cooling. The traffic management one way system is the main route connecting the roads between these villages and Higham. It is a busy route that is already used by a lot of vehicles.
- All of the above will cause gridlock, which will affect residents' physical and mental health, and quality of life. This also doesn't just impact lower Higher, but will have knock on consequences for Upper Higham, Shorne, Cliffe, Cooling, Chalk and other surrounding villages.

- The Plan admits the roads are narrow and single-track with informal passing places.
- The applicant has not provided modelling of HGV conflict, queueing, or pedestrian/cyclist safety.
- No monitoring locations near residential properties suggested by the applicant. This is something that should be in place already. The existing traffic management conditions in Higham are already abused and not monitored. The suggested system will be the same. No monitoring or consequences in place currently, so residents have no confidence that any other traffic management plans or conditions will be adhered to either.
- There has been no assessment carried out of the current traffic, noise, pollution and vibrations. How can it be safe to add a further 50 HGV movements an hour without this?
- How will emergency vehicles reach residential properties on Chequers Street, Canal Road, Church Street, Gore Green Road, Bull Lane and Lower Rochester Road with the traffic queues created by the traffic management system. These roads are narrow and difficult to pass in places (as noted in the applicant's own documents).
- Access to the public bus stop on Chequers Street and the School Coach Pick up on Chequers Street will be impacted. There are vulnerable and elderly residents who use the bus stop regularly, as well as the multiple local children who rely on the School Coach Pick up to get to school. There has already been one bus stop moved to School Lane. The loss of this bus stop would leave the local residents with no bus stop, and this would isolate the vulnerable and elderly residents.
- Access to public footpaths, which are used by many local residents for cycling, horse riding and walking, will be affected. The roads that are used to access these footpaths will be impossible to cross and walk along, and it will not be possible to access by car due to the queueing and loss of parking.
- No vibration assessment has been provided by the applicant.

## Condition 11 - Ecology

- The applicant's documents state "Further update surveys... **were not carried out.**" How can the removal of this condition be accepted without surveys being completed?
- "Emergence/return surveys... **should be carried out prior to demolition.**" The removal of these conditions would allow the applicant to start work. The residents do not have confidence that proper process would be followed if the conditions were to be removed, given the numerous breaches of other conditions in place already (such as the traffic management plans being abused, illegal clearance of ground, ), and therefore this should be carried out and included as part of the application process.
- The ecological appraisal is incomplete; and the previous mitigation used is outdated. This should be required as part of the process also.
- Idling HGVs, gridlocked due to the excessive volume and unsuitability of the roads, and the proposed traffic management plan, will increase pollution in the area.
- Has any assessment been carried out to determine if there are any protected species in the area, or to determine the impact on local wildlife? It does not appear that the applicant has taken this into account.

## Condition 12 - Contamination

- The site contains asbestos and hydrocarbons. There has been no assessment of airborne asbestos risk during haulage or capping the land.
- Vehicles leaving the Nuralite site after tipping could well be contaminated with asbestos dust/residue. A wheel wash would not be adequate to remove the possible dust accumulation on the body and cab of the HGVs. This will blow off the vehicles as they speed up, passing through the residential area, which is a severe health concern for local residents, and other visitors to the area. If this was to be approved (we remain of the position that it should not), we demand that there be a decontamination unit for all vehicles leaving the site. We also require a facility to test the potential contamination of vehicles before leaving site, to ensure that these conditions are adhered to.

- The capping activity itself would also generate airborne asbestos pollution. There are public footpaths close to the site, and this risk should be addressed, and managed.
- The applicant has not provided dust dispersal modelling or resident risk assessment.
- Canal Road itself is also made from Asbestos. It was never designed to be a road used for heavy traffic; it was laid in the 1970's by a local farmer. The current excessive vehicle movements on the road is a safety concern already, and the additional suggested 50 HGV movements per hour is a huge safety concern.
- Has any assessment been carried out to ensure all activities would remain within the legal control limit of the level of asbestos allowed in public areas? How would this be monitored on an ongoing basis to ensure this is not breached, and there is no risks to the residents and public.
- The residents are already concerned about current activity at the site, and the current lack of control/monitoring of activities.

### 3. Wider Resident Impacts

#### A. Loss of Parking

- The proposed junction redesign and yellow-line restrictions will remove **all on-street parking** on Chequers Street, Church Street, and Canal Road.
- These streets have **no alternative parking provision**; residents rely entirely on these spaces.
- Elderly residents, families, carers, and visitors will be severely affected.
- This will also impact residents who run businesses from their homes and rely on their clients being able to park outside their place of business. Customers of these businesses will not be able to park close by, and therefore are likely to find alternatives, meaning a huge economic impact for these residents.
- Heating-oil deliveries for homes without mains gas will become impossible.
- The removal of parking is **not referenced in the CTMP** but is a direct consequence of the redesign.

#### B. Property Value and Marketability

- Homes with no parking and heavy HGV traffic will suffer at least a **25% reduction in value**.
- Estate agents have indicated such properties would be **unsellable/unrentable** while industrial traffic continues.
- This is a **material planning consideration** under residential amenity and economic impact.
- The council must assess the **economic harm** to residents before approving any conditions.

#### C. Community Safety and Accessibility

- Increased HGV traffic endangers pedestrians, dog walkers, horse riders and cyclists using the canal path (NCN Route 1) and the roads included in the proposed traffic management plan. There are no footpaths on Gore Green Road, Lower Rochester Road, Canal Road, and most of Church Street. This will mean serious dangers to

those on foot trying to reach the train station, local school, bus stop, local shops, or those walking their dogs.

- These roads also provide access to bridleways and are often used by horse riders. There are multiple stables in Lower Higham, especially on Church Street who will be impacted by this as it will be impossible to use them safely with the increased HGV movements and inevitable queuing and traffic jams.
- The junction redesign proposal provided by the applicant prioritises industrial traffic over residential safety, which is not acceptable. Residential safety, the right to park outside their homes and the ability for residents to reasonably enjoy their homes must be the priority of the Council.
- No pedestrian safety audit has been provided by the applicant. Given this is an area that is used often by pedestrians, this must be completed as part of the process.
- Given the recent closure of Higham GP practice, residents of both Upper and Lower Higham must now travel to Cliffe or Cliffe Woods to access to health care. This is the main route to access those villages, and residents will not be able to access health care appointments due to the proposed one way system, and inevitable gridlock this will cause.

#### **D. Severe Disruption to Residents**

- **Daily noise disturbance.** The constant HGV movements will create continuous engine noise, braking, reversing alarms and vibrations throughout the day.
- **Sleep disruption** for those who work shift patterns or night shifts, children and elderly residents.
- **Air quality concerns** due to the diesel particulates from constant HGV traffic, worsening respiratory conditions.
- Single track roads will lead to **blocked access** for residents, unable to leave or return home when HGVs meet or queue.
- **Pedestrian safety risks** include children walking to the bus stop, dog walkers/canal path users, and cyclists will face increased danger from HGV over-swing and blind spots.

- Larger vehicles passing within inches of windows will intrude on resident's daily lives due to a **loss of privacy**.
- **Community isolation** will be caused due to friends, family and carers avoiding visiting due to lack of parking and unsafe access.
- Residents may also have prolonged **stress and anxiety** due to the constant noise, fear of property damage, and inability to park or safely access homes, causing mental health strain.

#### **4. Legal and Procedural Summary**

The conditions cannot be discharged because mandatory evidence is missing.

The wider impacts demonstrate the scheme's incompatibility with Gravesham's Core Strategy policies on:

- **Residential amenity**
- **Sustainable transport**
- **Community wellbeing**

## 5. Questions for Gravesend Borough Council

### A. Junction Safety

- Has the council received **swept-path analysis** for HGVs at the junction?
- Has a **Stage 1 Road Safety Audit** been completed?
- Has any modelling been done on **two HGVs meeting** at the junction?
- Has the council assessed the risk of **building strike**?

### B. Structural Risk

- Has the council required a **structural survey** of 1800s properties?
- Has any **vibration modelling** been submitted?
- Has the council assessed the cumulative impact of **50 HGV movements per hour**?

### C. Traffic Volumes

- Does the council consider **50 movements per hour** acceptable on a single-track road?
- Has any modelling been done on **queueing** at the junction?
- Has emergency access been assessed?
- Has any modelling/assessment been carried out with regards to the possibility of sink holes caused by the increased weight on the road due to the increased HGV movements?

### D. Ecology

- Why were **no updated protected species surveys** carried out?
- Is the council satisfied that Condition 11 is complete?
- Wildlife by the canal and fields surrounding the proposed traffic system will be impacted by the noise and pollution and general disruption. Has any assessment been undertaken regarding this?

## E. Contamination

- Has the council received modelling of **airborne asbestos risk** during haulage?
- Has dust dispersal been assessed for nearby homes?

## F. Parking and Property Impact

- Has the council assessed the impact of **parking removal** on residents and emergency access?
- Has any **valuation impact assessment** been undertaken for affected homes?
- Has the developer explored **rail freight or other non-road alternatives**?
- Will the council require **mitigation or compensation** for residents losing parking and devaluation of property?

## G. Alternative Transport Options

- The site borders **Hoo Junction rail sidings**, already used for freight.
- Rail haulage could remove thousands of HGV movements.
- The CTMP acknowledges the railway but fails to explore its use.

The residents urge the council to request a **feasibility study for rail freight** before approving any conditions, as it appears this is not something that has been considered by either the developer or the council.

There is also Queens Farm Road, which is wider than the roads in the proposed plan and already used by HGVs such as those used by RS Skips, and the other companies at the industrial estate. With a level crossing added at the end (there may already be a level crossing in place), this route would provide direct access to the Nuralite site, causing much less disruption to the residents of Lower Higham. It also appears this alternative has not been considered.

Have the developer/council considered any alternative options, including but not limited to those above?

## H. Other

- The residents feel that they are being discriminated against by the Council. This would not be allowed in Gravesend, so why is it allowed in Higham?
- Works have already been carried out at Nuralite, such as changes to the entrance of the Site and what appears to be illegal land clearing. Why were residents not informed of this work? Are there proper protocols in place to ensure that residents' lives are not being put at risk by asbestos disturbance?
- Why were the council so concerned about a few holiday lettings at Abbey Farm (which have been rejected multiple times, stating one of the reasons being the disruption and impact it would have on the local residents), yet have no concern about the material and severe impact this would have on local residents?
- Is anyone at Gravesham Borough Council looking holistically at all plans submitted for Higham, for example Nuralite plans, new homes plans, re-designation of green belt, Lower Thames Crossing? Considering applications individually is not in the best interest of local residents and there must be a duty of care from the Council to the local residents.
- Higham is a conservation area. The village is historic and should be preserved and protected. Why is Gravesham Borough Council not doing that?
- It will cost millions to introduce the suggested road changes. Has an independent cost benefit analysis on the use of the railway system for the transportation actually been carried out? The residents understand that the applicant has confirmed that use of the railway system is 'untenable' but we have not seen the reasons as to why. The residents believe this is due to cost, which is not their problem. Using the railway systems would hugely reduce the impact to residents, the environment, local wildlife etc.

## **7. Conclusion**

The residents are not necessarily opposing redevelopment but do oppose unsafe redevelopment that has no consideration for the severe negative impacts the residents face. It is hard to find any positive impacts for the residents. This redevelopment should only take place with minimal impacts on the local residents, and this current proposal is the opposite.

It should also be noted that the council have repeatedly rejected proposals for a historic barn at the end of Church Street to be converted to small holiday lettings, stating one of the reasons for rejection is the impact it would have on the local community and residents. This proposal will have a far greater negative impact than the proposed holiday lettings, yet there seems to be little regard for this.

The developer's own documents confirm that the route is narrow, single-track, and passes directly in front of residential properties. They confirm 50 vehicle movements per hour for three years, and 500,000 tonnes of imported material. Yet they have provided no swept-path analysis, no vibration modelling, no structural risk assessment, and no safety audit.

The conditions cannot legally be discharged because the evidence required to demonstrate safety simply does not exist.

Beyond the technical failings, residents face the loss of parking, reduced property values, and the industrialisation of a residential junction. These impacts are unacceptable and must be addressed before any approval is granted.