

SHORNE PARISH COUNCIL

Minutes of the Planning & Highways Committee Meeting held on 11th July 2019 in Shorne Village Hall

PRESENT Mrs S Lindley (Chairman)
Mr J Bugg (Vice-Chairman)
Miss P Clifton
Mr R Theobald
Mr C Rea
Mr B Lane
Mr R Hardy
Mr S White

Mr White was welcomed to his first Planning & Highways Committee meeting.

APOLOGIES Mrs L McCluskey

1. Minutes of the meeting held on 30th May 2019

The minutes were agreed proposed by Mr Lane & seconded by Mr Theobald as a true record and signed off by the Chairman.

2. Matters arising from the Minutes not otherwise on the Agenda.

There were no additional matters arising.

Planning:

3. Planning Applications/Issues pending:

a) Ringland, Pear Tree Lane – works exceed planning permission: A full-width rear extension was being built, despite there not being any planning permission and that permitted development rights have been withdrawn. GBC Planning Enforcement visited to inspect and spoke to the landowners, telling them that they must cease building however the owner has continued building at their own risk. They were also told to submit a new planning application, which has now occurred, but they are citing grounds of permitted development. This property has previously had eight various applications in recent years: a pool building, rear extension, loft conversion with prayer room and 2 additional bedrooms, and large extensions either side of the property. The last application had been for extensions either side of the property, this was approved by GBC but with all other permitted development rights being withdrawn. Works commenced with demolishing the porch and starting to rebuild it although that was not strictly within the permitted application, and also demolishing an outbuilding and the garage in preparation for the side extensions.

- b) 1 Ifield Cottages, Shorne Ifield Road – fencing in of verge: This has been investigated by GBC Planning Enforcement. According to the available Land Registry records, the verge is owned by KCC. Overall, the ownership history of land in the area is complex.
- c) Apex Business Park and Hoo Junction, Queens Farm Road (update): GBC Planning Enforcement had investigated the scaffolding structure and the 3-4 storey prefabricated building. That part of the site has a 3-metre maximum height condition applied, and is also supposed to be only for open storage of plant & equipment however prefabricated buildings do not come into this criterion. The site operators had previously been located at Nuralite where they had also built a tall scaffolding structure without planning permission and were required to take it down again. There has not been any further information about DB Cargo at Hoo Junction.
- d) Nuralite, Canal Road Higham – Industrial Estate proposal: We have submitted detailed representations for this, the entrance is in Higham but the bulk of the site is in Shorne.
- e) Longstanding “To Let” sign in Thong Village: A resident had expressed concern about there having been a “To let” sign in the village for a long time, and this was raised with GBC by Mr Lane. There is a right to put a genuine To Let sign outside a property however GBC are going to contact the agent for clarification.
- f) Verge, fence and gates of Sakho Farmhouse, Thong Lane: Mr Lane had taken this up with GBC again, who concluded that the fence and gates were not an enforcement issue. The matter has also been passed to KCC as regards the paving of the highway verge.
- g) Daymer, Green Farm Lane – new application: There have been various applications, that for a pair of 3-bedroom semi-detached houses was successful at Appeal, which means that we cannot oppose further applications on the same basis. The latest application adds a basement to the right-side property and moves the entire building further back on the site. We have asked for the parking to be revised and located within the true curtilage.
- h) Springhill, Pear Tree Lane: The two-car garage and fence with brick pillars have been permitted.
- i) Pear Tree Lane – request for general Tree Preservation Order: GBC had been asked previously but had declined to take any action. After another approach by Mr Lane they have now agreed to survey the area to see if there are native species trees that are worth preserving.
- j) Pear Tree Lane – house with building materials on frontage: Concern had been raised previously but the pile of rubble has now been removed.
- k) Clothes recycling bank – location request: We had received an enquiry about locating a clothing bank on Parish-owned land. There are not any specific laws but there is an Industry Code of Practice. There can be problems including over Public Liability and also from favouring one Charity. We have advised the enquirer that there is not anywhere suitable.
- l) Woodvale, The Ridgeway – state of house and grounds: Concern had been expressed, GBC are talking to the owners who now reside elsewhere.
- m) Scalers Hill: The application for a cement distribution business has been refused.

n) 29/31 The Street: The planning application that was submitted last August has not been determined by GBC, refusal was expected or negotiation of a more suitable design.

4. Report of Action taken under Standing Order 4(a)(ii), Schedule of Planning Applications (26) dealt with by the Chairman in Consultation with Members (circulated)

There have been three applications since the previous meeting but they included the Nuralite one which was very complex. Mrs Lindley reported that she has been looking into improving the format of the report to the Committee, to perhaps use embedded PDF's and include the link to our submission on the GBC website in the published final version.

5. Notices of Appeal:

- a) 20181068 – Thong House, Thong Lane – Still pending
- b) 20180713 – 15 The Street, replacement windows – Still pending. As discussed previously, Mr Theobald had submitted representations in support of the householder.

6. Major Plans etc affecting the Parish:

Lower Thames Crossing:

- a) Marling Cross Compound and Queens Farm Road: These are in use although the planning application has not yet been determined. It was discussed that there have been problems due to HGV's trying to use the Marling Cross site thinking it is still a lorry park.
- b) Ground Investigation Works: We have asked for more information about this work and a meeting has been offered by Highways England in late July/early August. There had been problems due to poor signage where works are affecting footpath NS169 near Michael Gardens.
- c) Traffic monitoring: This was undertaken on several local roads including Brewers Road and Thong Lane so we have asked to be sent copies of the data.
- d) Hydrology Testing: More hydrology testing is to be undertaken.
- e) Project Director: Tim Jones has left the project.

7. Outside Parish but with impact:

Cobham Lodge, southern end of Valley Drive – application to build 64 flats: There was discussion about how best to approach making input into this at the Regulatory Board. Mr Lane will discuss with Mr Theobald once the date is known.

Highways:

- 8. Accident reports:** None notified
- 9. Traffic monitoring, Speedwatch, Lorrywatch:**

- a) Speedwatch results: Miss Clifton has circulated the recent results – there were three cars detected speeding at the Bowesden Lane survey point (35mph, 36mph and 36 mph)
- b) Lorries: No specific reports

10. Road condition/highways issues and Hazards:

- a) Trees/Vegetation overhanging roads: 2 Park Cottages, Pear Tree Lane and Court Lodge. Residents have made some attempts to cut the vegetation back but not as much as desirable. A request will be repeated in the next Parish Magazine.
- b) Stream emerging in verge outside Silverdene, Tanyard Hill: No update received from KCC. The situation not helped by debris in the road following hedge cutting, Mr Lane is reporting this.
- c) Butchers Hill (top): The puddles still need filling and the ground levelling
- d) Butchers Hill (bottom): The previously reported blocked drains have been cleared
- e) Mill Hill Lane: The broken-up road edges and potholes are to be repaired, date awaited. The drains were investigated and cleared.
- f) Dip on Tanyard Hill near Court Lodge causing puddle: This has been repaired.
- g) Brewers Road and Pear Tree Lane speed limit reduction: Mrs Lindley has been asked to fill in a highway improvement plan form.
- h) Green Farm Lane: There was a report seen on-line about flooding but nothing has been reported to the Parish Council so Mrs Lindley is unsure where and when this was. There was discussion about the weight restriction as Mr White is concerned that vehicles are frequently ignoring it. Mr White previously organised a Lorrywatch scheme there and will look to restarting it as it is thought that it did previously help deter lorries.

11. Parking/traffic problems, Waiting restrictions and Highway modifications:

- a) Dumped cars: The possible dumped car near the See Ho has been removed. The one in Forge Lane is still there, it has been reported to KCC but that vehicle is taxed and has a valid MOT.
- b) Car parking on double yellow lines opposite the Rose and Crown: This has been reported to the police by a parishioner.

12. Feedback from GBC/KCC Joint Transportation Board:

The last meeting was on 5th June 2019, from which there is nothing specific to report. The next will be on 11th September, four items have been put forward for the agenda as minuted previously - Parking around the country park and Road Safety in Park Pale, Yellow Lines on corners near the school, Enforcement time allocation in rural areas, Red Route buses.

13. Open Consultations:

M2 Junction 5/A249 Stockbury Roundabout Improvements Publication of Orders under the Highways Act 1980 on 13 June 2019

<https://highwaysengland.co.uk/projects/m2-junction-5-improvements/>

14. Closed consultations/for information:

Government response to consultation on Planning Reform: Supporting the high street and increasing the delivery of new homes

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799220/Government_Response_to_Planning_Reform_Consultation.pdf

15. Matters raised by Members and attending Parishioners

- a) Mr Rea - Shorne Ifield Road has been cleared of all the recent fly tipping. The possible adverse effect of the introduction of charging at the refuse dumps was discussed.
- b) Mr White - Reported the surface at the bottom of Mill Hill Lane is very slippery and dangerous as there is no skid resistance. A horse slipped underneath the rider, who has been injured. Mrs Lindley will check with KCC about what they plan to do when repairing.
- c) Miss Clifton - Reported hearing motorbikes at Park Pale on Wednesday 10th July but when she attended couldn't see anyone apart from 2 bikes with their engines off. Concern was expressed that residents should not go themselves if there is a problem.
- d) Mr Lane - Harlex are trying to arrange another meeting with the police about parking in Park Pale.
- e) Mr Lane - A resident of Ifield Farm contacted him regarding possibly using the car park & the green on Shorne Common at Mill Hill on Sunday 8th September, 2-7pm for parking associated with a child's birthday party, as it would avoid potential problems on Shorne Ifield Road. This was discussed and it was considered that the Common could not suitably be used for a private event as that would prevent general recreational use. It was suggested that the resident could contact the Scouts to ask whether parking on their site might be possible.

16. Matters from other Committees being discussed for convenience

- a) Mr Theobald - There was a fallen tree bough on the Swillers Lane path, which also had a bees nest in it, the bough has been cleared.
- b) Miss Clifton – Mrs Olid has asked to thank everyone who attended the civic service.
- c) Mr Lane - reported that there has been a request under the Freedom of Information Act to see the Village Hall Lease. There is not a lease but there is a Trust Deed, this will be supplied to the resident.
- d) Mr Lane - 20 residents have volunteered to help distribute the annual report, Councillors will then fill in where necessary.

Meeting finished: 21.30

Signed by Mrs Lindley

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PLANNING APPLICATIONS RESPONDED TO SINCE 30th May 2019:

Ref	Address	Description	SPC Submission
20190482	Lorry Park Marling Cross Valley Drive Gravesend Kent	Erection of temporary portable cabins with associated fenced off laydown area and car parking area with 3m fence around the site, lighting and perimeter landscaping.	<p>The site of this application lies just outside the Parish Boundary but the application will impact on Shorne Parish and our residents.</p> <p>The Parish Council has NO OBJECTION IN PRINCIPLE to this application, but wishes the following comments to be taken into consideration:</p> <ol style="list-style-type: none"> 1. The application refers only to the site of the compound itself but the need for the compound relates to works being undertaken along the proposed route for the Lower Thames Crossing, in Shorne Parish and Chalk, including within areas of the North Kent Marshes and close to the Thames and Medway canal. 2. No detail has been provided of these drilling works, such as: vehicle types and routes, avoiding unsuitable country lanes; days and hours of drilling operations; number of bores to be drilled; noise reduction measures and limits, any vibration consequences; landscape impacts and post-drilling restitution; wheel washing facilities to keep mud from compromising local road surfaces; any associated enabling engineering works. 3. The road safety aspects in the Marling Cross area are of particular concern as Valley Drive is very busy and vehicles are travelling at speed in both directions. The proposal introduces new vehicle movements, the majority (but not all) said to be turning left into and right out of the site. The Transport Appraisal refers to Crashmap data for the last 3 years, however the site had not been operating as a lorry park for probably all of that period and perhaps longer. Usage also reduced after the A2 realignment as the parking area became more difficult to access and less visible from the main road. Inspection of all 20 years of Crashmap data gives a different picture with around 40 incidents in the immediate area although some relate to the previous road configuration. We are concerned that the accident rate may increase again, and request this should be kept under frequent review. <p>(Sent 6/6/19)</p> <p>http://docs.gravesham.gov.uk/AnitePublicDocs/00443655.pdf</p>
20190290	Nuralite Industrial Estate Canal Road Higham Rochester Kent ME3 7JA	The proposal is for the systematic redevelopment of the existing Nuralite site. This includes the importation of inert materials to cap, and landscape the historic asbestos landfill, thus containing its contamination risk. To demolish the existing buildings of the Nuralite industrial estate, deal with existing contamination,	<p>GR/2019/0290</p> <p>Nuralite Industrial Estate Canal Road Higham Rochester Kent ME3 7JA</p> <p>The proposal is for the systematic redevelopment of the existing Nuralite site. This includes the importation of inert materials to cap, and landscape the historic asbestos landfill, thus containing its contamination risk. To demolish the existing buildings of the Nuralite industrial estate, deal with existing contamination, both through capping and removal of areas of hydrocarbon pollution, the laying of new service and utility infrastructure and the construction of 11 new purpose built light industrial type units and a site office.</p> <p>The Nuralite Industrial Estate lies mainly within the Parish of Shorne, the Parish Boundary with Higham (to the east) running north-south through the easternmost part of the site. Hence while the entrance and approach roads are in Higham, the bulk of the site is located in Shorne Parish.</p> <p>The Parish Council previously submitted comments on the Scoping Opinion under reference 20180802. The majority of the comments made then are still pertinent. This submission updates these with regard to the numerous documents supporting this latest application.</p> <p>PRINCIPAL OBJECTIONS:</p>

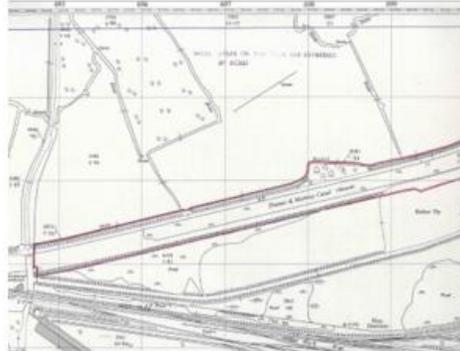
		<p>both through capping and removal of areas of hydrocarbon pollution, the laying of new service and utility infrastructure and the construction of 11 new purpose built light industrial type units and a site office.</p>	<p>There are two main aspects to this planning application, to which we OBJECT:</p> <ul style="list-style-type: none"> • Replacement Industrial Estate layout – We OBJECT to the expansion of the Industrial Estate beyond its original built footprint and particularly beyond the historic boundary of the Nuralite site. Additional replacement units and hardstanding etc should not be allowed outside of the original built area (the previously developed land), as defined by the original route of Footpath NS156 around the western and northern limits of the original Nuralite buildings plus not extending east of the disused reservoir. • Capping the whole site (Contamination remediation) - The western part of the site was in the past polluted in some areas but then remained undisturbed for several decades. The principal problem today is that the land was then disturbed by the applicant and contamination was spread into new areas. It is our belief that the majority of the western parts were in a safe condition prior to this. We OBJECT to the proposal to cap the western part of the site and to the depth stated as we do not believe this to be necessary merely for restoration of the damaged wildlife habitat. Scrub is already naturally regenerating, particularly on the margins of the site, and can continue to do so. We suggest that independent expert advice is needed but otherwise would accept the opinions of GBC/KCC concerning the suitability of the proposals for remediation of the canal, the types and depth and configuration of the capping materials, the new land profiles, and the required design of perimeter and slope structures. However, we would prefer the canal to be re-excavated and remediated in all areas as a Community Asset. We would also like to see a more natural appearance at the perimeter rather than a high and steeply edged, flat-topped platform particularly at the western and south-western boundaries. All the perimeter walling should be plantable so that it is camouflaged. We suggest that the remediated area, stated to be proposed as a Nature Conservation Area, should be more clearly defined and protected by being permanently fenced off from the Industrial Centre and any public picnic area (if permitted). Conditions should be imposed safeguarding against all future development. There also needs to be a separate and conditioned management plan. <p>Other issues arise from the proposals and are detailed below, but we are particularly concerned about:</p> <ul style="list-style-type: none"> • Development in the Green Belt: With a proposed near 50% increase in floorspace the development becomes inappropriate and with a greater impact on Green Belt openness. No special reasons have been provided to support expanding the built area, and the proposals as a whole are not sustainable development. • Further disturbance of the contaminated land: It would be preferable for there not to be any further disturbance of the land. Disturbance that has already occurred has resulted in contaminated soils being distributed more widely over the site and this should be rectified and brought back to the previous longstanding state. • Traffic impacts: There will be significant traffic impact on the Lower Higham Conservation Area with traffic increase and consequent noise, fumes and vibration pollution being imposed on the residents of the Chequers area of Lower Higham and other nearby roads. • Impact on local amenity and environmentally protected land: Likelihood of noise, light and environmental pollution arising from increased site size and activity impacting on the amenity of the adjacent footpath and cycle track, and the North Kent Marshes, plus the impact on the wider landscape. It should be noted that Canal Road passes through the Ramsar Site (see map extract below). The proposed picnic area is also within the Ramsar site. The appropriateness and actual usefulness in the location shown is uncertain and there are obvious disadvantages. Meanwhile the plans do not otherwise show or define any recreational or open-air amenity space for the users of the industrial estate. • Landscape Impact: At present the Landscaping/Habitat Creation plans read well but these need replacing
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with detailed and definite plans which actually get implemented. Rather than building right up to the southern boundary, a margin should be left at the top of the new perimeter bank to allow for dense and tall permanent plantings of trees and bushes to screen the new buildings from close and distant views.

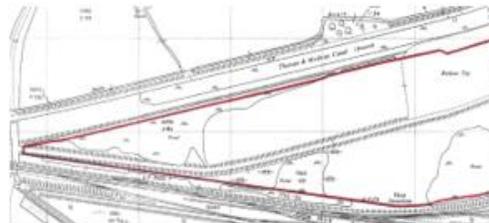
GENERAL POINTS:

Land Registry information: The land which is the subject of this application was acquired by the present owners in May 2013. It consists of two separate parcels of land:

- K426860 is the Nuralite Industrial Centre and the adjacent Canal bed:

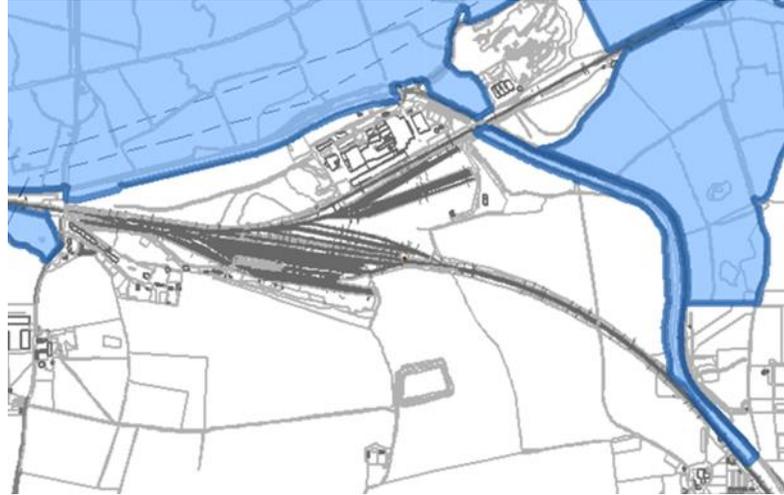


- K645198 is the land of the western part of the application site. The deed contains restrictive covenants concerning use of the land and its effect on neighbouring properties.



The point is that buildings were historically limited to the south-eastern area as previously bounded by the public footpath NS156 prior to its diversion. No buildings etc have ever existed on the western part of the application site, which is a separate physical area.

Location and suitability of the site, and non-sustainable development: While the site is already in existence, a factory having been first built there in the early 1900's, if this were a new application it would be strongly opposed as the location would nowadays be considered highly inappropriate. Originally, the bulk of staff, materials and products were transported by rail. The proposed change of use of the site will nowadays impact adversely on local residents and threaten the adjacent North Kent Marshes and Ramsar Site. Having such an industrial estate in a remote rural area is not a sustainable form of development. There is no housing close nearby and no public transport, therefore the development will encourage increased vehicle use for access by workers and visitors.



Extract from map on GBC website showing the boundaries of the Ramsar Site, see https://www.gravesham.gov.uk/__data/assets/pdf_file/0006/195837/Ramsar-Site-and-Special-Protection-Area-Map.pdf

Alterations to the site since May 2013: Significant adverse alterations to the site have already been made without there being planning permissions in place. These are principally that:

- In 2016 all existing trees and vegetation habitat was cleared from the bulk of the site, along with the removal of the previous perimeter fencing. This activity disturbed Asbestos containing ground at risk to the workers and anyone in the vicinity at the time, including in part of the Ramsar Site. The site was levelled with materials being banked to the edge of the canal, which may have increased its contamination.
- Large areas of hardstanding have been laid out in locations beyond the footprint of the pre-existing Nuralite site.
- High, metal palisade fencing has been erected on the perimeter by the canal where it has visual impact.
- There is open storage of containers stacked up to three high. Previously, a large scaffolding structure was erected, which was taken down after Planning Enforcement intervention.

Application description and building heights: The description refers to 11 purpose built units but these actually comprise 55 two-storey units (all of 7.8m net height) of varying sizes now proposed in 11 separate buildings, plus 5 more hardstanding/open storage areas (height restriction is needed on these) and the offices/canteen building (net height appears to be 6.5m). Due to the ground level being raised prior to building, the gross height of all the industrial

			<p>units for landscape impact assessment is approximately 2m higher, i.e. 9.8m.</p> <p>Plans: We have the following additional comments on the presently submitted plans:</p> <ul style="list-style-type: none"> • Master Plan deficiency: The deposited proposed site plan does not show the western boundary of the site (although included in other documents). • Encouraging sustainable travel: Reference is made in the transport/Travel plans to the units having showers so as to encourage cycle use but the units do not show any internal fitting out that would ensure this and such a facility is also not included in the more communal office/canteen building. • Package Plant and water supply locations: The proposed location for the Package Plant (Sewage collection) and the borehole well and water treatment plant are not shown on the plans. • Refuse arrangements: Location of refuse bins and bin stores, including for the canteen/offices building are not shown. • Cycle Route and Footpaths, site entrance: The proposed arrangements for the cycle route and footpaths, and generally at the entrance to the site are presently vague and more detail is required. An oblong structure is shown by what appears to be a gate, and the land to the east of this (north of the offices building and new entrance road) is not described. No barrier/gate is shown at the entrance. • Fencing: Details are needed of the location and composition of all proposed perimeter fence treatments plus those for the individual units and the hardstanding/open storage areas. • Paths within the site: These are not shown clearly as the plans presently lack detail. The clear line just south of the canal requires clarification as do the edges of the remaining pond. • EIA: The full EIA has not been made available on-line, only an over-brief non-technical summary. • Perimeter vegetation and trees: The siting of buildings close against the southern boundary does not allow for any screening trees and vegetation to be planted there and this should be rectified. The screening to Canal Road should all be retained undisturbed. • Materials/colours to be used: Brick would be preferable to blocks, and metal cladding should be coloured to camouflage the buildings in the landscape, i.e. usually to be some variant of Khaki Green. There is discussion about possibility of “green roofs” but also of photovoltaic panels – “green roofs” would be welcome but conditions would need to be imposed concerning their maintenance and permanence. <p>Parish meeting: The Transport Statement refers to the meeting held in Higham Parish however no meeting was offered to Shorne Parish and there has still not been any contact to the Parish Council from the owners/developers. Higham residents were strongly opposed to the proposed increases in traffic. It is stated that Higham and Lower Higham residents were supportive of the covering of the landfill however that physical area lies in Shorne Parish.</p> <p>Operational Policy: The deposited documents do not include an operational policy detailing matters such as: operating hours (said in text to be 06.00 to 20.00) and their enforcement; any restrictions on tenants/usage of the business units to reduce pollution risks; usage of the canteen and office building; security and other lighting during operating hours and at night; prevention of dust and rubbish etc contaminating the local environment; cleaning and maintenance of the common parts of the site, etc.</p> <p>TRANSPORT AND ACCESS ISSUES:</p> <p>Future traffic levels: Our principal concern is with the operational phase. The traffic assessment and prediction data is flawed in a number of ways and therefore lacks credibility. This is mainly due to it being adjusted using national figures relating to total site floorspace however the way that space is divided up (i.e. the number of individual units) is</p>
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			<p>more relevant as each of the 55 units is likely to have several employees plus visiting vehicles. It is more likely that existing staff numbers and predominant personal vehicle use (which negate the travel plan) will be multiplied up (from 4000sqm in use to over 24000sqm – this cross-references with previously submitted data that employment numbers might increase from 100 to 670-700), which would result in higher traffic figures. Traffic increases will also vary depending on the exact uses of the various units, the extent of distribution uses and especially if any of them attract visiting public, so could be even higher and on-site parking provision may prove inadequate.</p> <p>Unsuitability of access routes and road safety concerns:</p> <ul style="list-style-type: none"> • The proposed road “enhancements” are noted however we are overall concerned about possible creation of an urbanised appearance in a rural environment. • In the Lower Higham Conservation Area the proposed roundabout will lead to prevention of on-street parking immediately outside the houses of many residents, and would likely be displaced into Canal Road so creating a different hazard. • The green area which would be taken at the north-east corner of the junction presently accommodates community facilities and services (postbox, salt bin, disposal bin, road signs, electricity/telegraph pole) which would all need to be reprovided. • The documents refer to different routing of incoming and outgoing traffic during the remediation and construction phases, this needs to be continued and enforced during the operational phases. • The proposal is that vehicles will be directed to use the B2000 and travel via Lower Rochester Road for inbound movements and Gore Green Road for outbound movements. However, the junction of Gore Green Road to Lower Rochester Road is “blind” and the increased inbound traffic on Lower Rochester Road will increase hazards at this junction. • As before, we note the restricted height of the nearby railway bridge, which will result in operational restrictions during all phases. Over-height lorries reaching that point would not be able to turn in Canal Road. • In addition to the comments made by the KCC PROW Officer, which we support, we also point out that connecting between Footpaths NS156 and NS140 relies on using a length of Canal Road passing under the railway bridge. Road configuration to ensure safety of walkers and cyclists should also be created on this section. Traffic calming structures (as elsewhere on Canal Road) should be installed on Canal Road between NS156 and the site entrance. <p>Public parking outside the entrance: As mentioned previously, for very many years, public have parked on unused ground by the entrance to the site in order to take walks. It is likely that they will instead park on Canal Road if no provision is made for public parking.</p> <p>POLLUTION AND OTHER ENVIRONMENTAL ISSUES:</p> <p>Air pollution: For vehicle originating pollution, this is informed by traffic data (see above) which we believe to have been underestimated. Even with the low figures presented there is a prediction of adverse effect at the Lower Higham end of Canal Road. We are also concerned about potential air pollution impacting on Canal Road itself where there is Ramsar Site on both sides of the road, and also pollution to the North Kent Marshes from business activities on the new Estate. The nature of work undertaken by the tenants will have to be closely controlled.</p> <p>Light Pollution: The proposed site is likely to have higher lighting levels than at present, for safety of access and security, this is a concern in a rural and protected area where there is high landscape visibility. The light fittings should be shielded to avoid lights being visible outside of the site and they should be off or dimmed during hours of</p>
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			<p>darkness/at night unless triggered for security purposes.</p> <p>Litter etc: Experience elsewhere of industrial estates accessed via rural roads is that considerable littering occurs along the access route. In this case, the verges of Canal Road are part of the Ramsar Site. The operational policy should include measures to reduce and rectify litter contamination within the site and along all approach routes.</p> <p>Noise pollution: In open, flat landscapes noise travels a considerable distance. There will be additional concerns due to noise from vehicles accessing and moving (especially reversing) within the site, security alarms etc. Modern industrial units do not contain noise well, and doors etc are likely to be open during warmer conditions. This will affect the ambience and tranquillity of the adjacent footpaths and cycle route, and also affect wildlife within the Ramsar site and elsewhere locally.</p> <p>Direct damage to protected land: The proposal will increase recreational use of, and potential damage to, the Ramsar site by staff and visitors - the document notes that on-site workers, said to number up to 700, are likely to remain in the area across lunchtime.</p> <p>Visual intrusion and urban appearance: We do not accept the statements about lack of visual impact made in the EIA summary and the landscape and visual impact assessment. The proposal creates a much more visually intrusive site with two-storey modern buildings (on a raised platform, so equivalent to three-storey in new height) close to the footpath and cycle route, and the Ramsar site. It reduces the visual amenity of important recreational routes including footpath NS156. It creates an urban appearance where presently rural. There will be visual impact over a wide area due to long distance views from much higher ground to the south, which are not sufficiently considered. There should be a requirement for existing mature and tall trees to be retained plus for additional tall permanent plantings all around the perimeter of the buildings area to screen the buildings from long-distance view.</p> <p>Loss of habitat: The proposal seeks to permanently fill in part of the Canal course at the eastern edge of the site however the reasons or need for this are unclear. It is noted that the proposal also involves loss of the easternmost pond and its surrounding dense, mature habitat, which is already a designated local wildlife site.</p> <p>OTHER GENERAL/PLANNING ASPECTS:</p> <p>Utilities/Services: The lack of standard Utility/Services provision to the site is of great concern. However, proper provision of new utilities will be disruptive to local residents and damaging to the rural environment.</p> <ul style="list-style-type: none"> • Electricity: Supply to Bridge House must be maintained and assured as part of this project. • Mains/Potable water supply: It was not made clear in the Scoping application that the site does not have a mains/potable water supply. This would be an essential service provision for any redevelopment of the site. There is an assumption in the proposals that borehole water can be used instead in sufficient volume but water analysis results suggest that this water would need to be treated before use. Possible abstraction of large amounts of borehole water so close to the Ramsar site and marshes is a cause for concern. Conversely, the report also refers to likelihood presently of significant pipe leaks, and stopping these might also adversely influence groundwater levels locally. • Foul drainage/Sewerage: The site does not presently have any main sewer connection. The plans include a large “package plant” (the modern equivalent of a cesspit/septic tank) for sewerage but this will not accommodate large inflow volumes, catering outflows or other sources that include untreated grease or oils or other chemicals that result in biological inhibition – these provisos would restrict business usage of the site or otherwise adversely affect the functioning of the plant. The location of the plant is not shown on the plans. • Rainfall Drainage: A large increase in hardstanding area (“considerable hardstanding area extension”) and also of the total built area with roofs is proposed. While the quantity of rainfall onto the site will be unchanged, the
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20190598	Lark Rise Pondfield Lane Shorne Gravesend Kent DA12 3LD	Application for a Lawful Development Certificate in respect of the proposed swimming pool and enclosure.	<p>This application places the proposed swimming pool building in the same location as previous application 20190257, i.e. north-east of the house, close to the boundary and neighbouring property (Broadwood House). We note the altered dimensions and design of the building since the previous application.</p> <p>The Parish Council has no objection to the principle of this proposal, provided that there are not any significant objections from the neighbours.</p> <p>As a comment, the plans do not show any associated maintenance plant/pump house or changing facilities, which we assume are incorporated within the layout of the proposed building. The location and hours of operation of pumps must be such that there is not a noise nuisance created for the neighbours. (Sent 8/7/19)</p> <p>http://docs.gravesham.gov.uk/AnitePublicDocs/00447072.pdf</p>