



Delegated Report

Approval of Details Application

Application no: 20260351

Location: Former St Josephs Convent Preparatory School 46 Old Road East
Gravesend Kent

Description: Application for the partial approval of condition 3 (Construction Environment Management Plan (CEMP) attached to planning reference number 20240013.

Applicant: Galliard (Gravesend) Ltd

Site Visit Date: N/A

Planning permission was granted for 'conversion of existing Victorian building into 6 flats. Demolition of existing outbuildings. Erection of a 3 storey medical centre. Erection of a building containing 7no flats. Erection of 41no houses. Associated works to include; access, public open space and landscaping' under application ref. 20240013 on 21 November 2025.

This was subject to a number of conditions including condition no. 3 which this application seeks to partially discharge. Partial discharge is sought in so far as it relates to the construction of the residential element of the approved development only. For clarity, the applicant advises that this includes all elements within the orange boundary line on the submitted site plan which is as follows. This means it does not include the doctor's surgery element of the development permitted under application ref. 20240013.



The information that has been submitted in pursuance to this condition is:

CONDITION – Delegated Report (Blank)

- Covering Letter;
- Application form;
- Drawing (un-numbered) – Proposed Site Plan Boundaries;
- Construction Environmental Management Plan by Galliard Construction.

Consultations

GBC Environmental Protection

The submitted CEMP has been reviewed. It's understood from the application details that this only relates to the residential part of the development as shown on the submitted site plan.

For the sections in the condition that relate to Environmental Protection, sufficient and appropriate details have been included in the CEMP.

There is no objection to the condition being discharged for this part of the development.

KCC Highways

I refer to the above planning application and having reviewed the Construction Environmental Plan submitted, raise no objection on behalf of the local highway authority for the discharge of condition 3.

Officer's Analysis

Condition 3 is:

3. No development shall take place until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority.

The document shall cover all environmental impacts from the clearance and construction phases of this development including details of the following, as well as any other measures deemed reasonably necessary:

(a) Suitable mitigation measures to minimise noise pollution and vibration during the construction phase including the insulation of fixed plant and the silencing of vehicles and mobile machinery.

(b) A Dust Management Plan to minimise emissions to air and to prevent nuisance from wind-blown dust including fencing and the dampening down with water of excavated construction and cover materials on site, and other areas traversed by plant vehicles and machinery.

(c) A Construction Traffic Management Plan covering:

- Means of direct access to the site from the adjoining maintainable public highway
- Surface treatment of the access to avoid spill of migratory material on to the maintainable public highway.

- Details of numbers and routeing of construction and delivery vehicles to / from site

- Timing of deliveries and waste movement.

- Loading and unloading of plant and materials away from the maintainable public highway.

- Parking and turning areas for construction and delivery vehicles and site personnel.

- Type and location of wheel washing and chassis cleaning facilities. - Temporary traffic management / signage.

(d) Details of the location of the proposed construction compound.

(e) Details of security fencing and other site security measures.

(f) Details of stockpile areas for building materials or for fill or removed topsoil.

(g) A Construction Drainage Design Plan to identify the required devices to prevent construction run off from flowing into existing drainage.

(h) Ecological mitigation measures.

(i) Measures to be undertaken to protect any public sewers and water apparatus.

(j) Details of vibration monitoring and mitigation during any necessary piling works. (k) Details of

temporary construction or security lighting; and

(l) Monitoring and review provisions with the Local Planning Authority.

(m) A Community Engagement Strategy covering how local residents, community groups and businesses will be kept informed about the development and construction timetable and works taking place, until completion of the development.

The construction of the development shall adhere at all times and be carried out in full accordance with the relevant approved document or any subsequent variations that may be approved in writing by the Local Planning Authority.

Reason *To ensure that a suitable programme of all works is set out from the commencement of development, to demonstrate that the free flow of traffic on the highway and to minimise the impact on local residents and businesses, in accordance with policies CS11, CS12 and CS19 of the Gravesham's Local Plan: Core Strategy (September 2014).*

For ease of reference the different elements of the condition are repeated below with comments on each section:

(a) Suitable mitigation measures to minimise noise pollution and vibration during the construction phase including the insulation of fixed plant and the silencing of vehicles and mobile machinery

In section 8 of the report under 'Noise Control Measures', a long list of mitigation measures are proposed to minimise noise which are:

- Vehicles and mechanical plant will be maintained in a good and effective working order and operated in a manner to minimise noise emissions. The contractor will ensure that all plant complies with the relevant statutory requirements;
- HGV and site vehicles will be equipped with broadband, non-tonal reversing alarms;
- compressor, generator and engine compartment doors will be kept closed and plant turned off when not in use;
- all pneumatic tools will be fitted with silencers/mufflers;
- care would be taken when unloading vehicles to avoid unnecessary noise;
- the use of particularly noisy plant will be limited, i.e. avoiding use of particularly noisy plant early in the morning;
- restrict the number of plant items in use at any one time;
- plant maintenance operations will be undertaken at distance from noise-sensitive receptors;
- reduce the speed of vehicle movements;
- ensure that operations are designed to be undertaken with any directional noise emissions pointing away from noise-sensitive receptors;
- when replacing older plant, ensure that the quietest plant available is considered;
- drop heights will be minimised when loading vehicles with rubble;
- vehicles should be prohibited from waiting within the site with their engines running or alternatively, located in waiting areas away from sensitive receptors;
- local hoarding, screens or barriers should be erected to shield particularly noisy activities;
- temporary noise screens will be used to reduce noise from particularly noisy activities and the height of perimeter hoarding will be extended where this would assist in reducing noise disturbance at sensitive receptors;
- hours of operation should be strictly enforced and any deviations other than those previously identified will be with the consent of the local authority;
- limiting of high impact activities (including piling works) to specific times of the day. For example, this may include 1 hour on – 1 hour off, or the restriction of such activities between 09:00-12:00 and 14:00-17:00;
- piling will be carried out with the method that minimises both noise and the transmission of vibration to sensitive receptors;
- vehicles, plant and equipment will undergo regular servicing and maintenance to prevent irregular noise levels;
- the location of stationary plant in areas which will have a minimized impact on occupied residential and commercial properties, where feasible;
- static plant, when in operation, is to be sound attenuated using methods based on the

guidance and advice in the BS 5228, where practical;

- implementation of Best Practice Means (as defined in Section 72 of the COPA) by trade contractors at all times, and are to carry out all work in such a manner as to reduce disturbances from noise and vibration;
- preference for electrically powered plant, to mechanically powered alternatives, where practical.

This is considered to be a very well thought out and detailed list which shows that care will be taken during the construction phase to minimise noise. GBC Environmental Protection and KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to part (a) of condition 3.

(b) A Dust Management Plan to minimise emissions to air and to prevent nuisance from wind-blown dust including fencing and the dampening down with water of excavated construction and cover materials on site, and other areas traversed by plant vehicles and machinery.

It is stated that all available techniques (best practicable means) shall be used to minimise, as far as is necessary, the level of dust generation to which neighbouring residential estates will be exposed. It states what information employees and contractors will be advised on as part of their on-site training.

The access to the site directly off the gate at 46 Old Road East shall be laid out and constructed by prior arrangement with and to the requirements and specifications of the local Highway Authority with details agreed with the LPA before construction and the access road are first used. As required the road will be swept and wheel washing carried out with the speedy hire jet washer/bowser facility which will be provided at the site entrances and ensure that there will be no discharge of water onto the highway. In dry or windy conditions, the hard finished areas of the site shall be damped down to prevent dust arising using a 110 litre mobile water bowser. Any vehicles removing and delivering to the site shall ensure all loads/materials are covered over where required and a banksman shall ensure safe access and egress arrangements and prevent overloading, loading and dropping materials from height where practicable. Dusty activities on site will be damped down as detailed above and where practicable the areas following cutting and excavation operations will be covered over. Where possible materials will be brought to site pre-cut and all plant used for cutting will be fitted where possible with water suppression systems, notably the cutting of concrete pipes and rings when required. Full details of how dust levels will be monitored are provided.

This is considered to be a detailed list of how dust will be managed on site from the development. GBC Environmental Protection raise no objections and therefore it is considered that acceptable details have been submitted in relation to part (b) of condition 3.

(c) A Construction Traffic Management Plan covering:

Means of direct access to the site from the adjoining maintainable public highway

This would be from Old Road East through the gate at no. 46 Old Road East shown in the submitted diagram with the green arrows:



The access would be within the application site itself and directly next to the existing school building. GBC Environmental Protection and KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

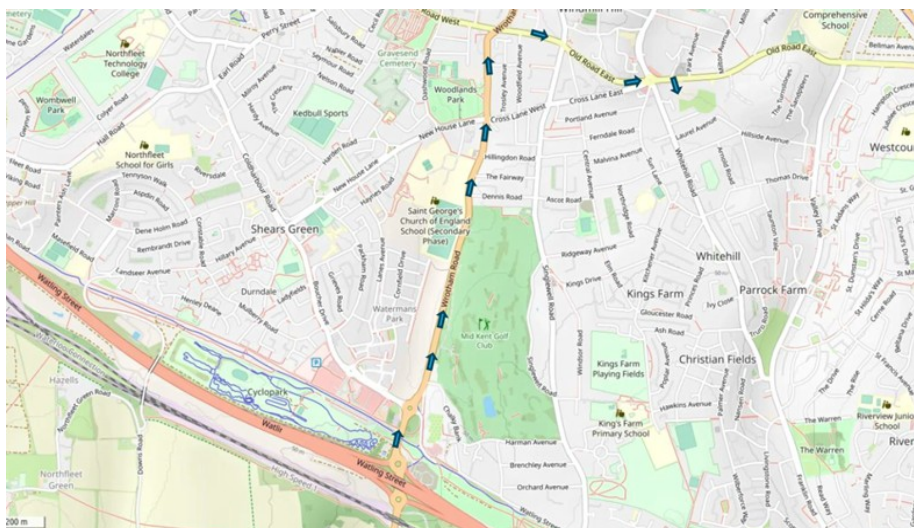
Surface treatment of the access to avoid spill of migratory material on to the maintainable public highway

It is stated that any temporary construction access is to be laid out and constructed by prior arrangement with and to the requirements and specifications of the local Highway Authority, all details will be agreed with the Development Management Team at Gravesham Borough Council before the commencement of works and before the haul road/ access points are first used. KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

Details of numbers and routing of construction and delivery vehicles to/from site

No specific numbers provided but it is stated that a Just In Time system will be used which is one where goods arrive exactly when needed.

It is stated that contractors will use a designated construction traffic route for deliveries to the site and removal of waste etc. Vehicles will reach the site from A2 through Wrotham Road (A227) for approximately 1.1 miles, entering Old Road West (B261), following to Old Road East for approximately 0.7 miles then turning right to enter the site at 46 Old Road East DA12 1NR. Vehicles leaving the site will follow the above route in reverse to reach A2. The proposed vehicle route is as follows:





KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

Timing of deliveries and waste movement

It is stated that the location and the size of the site require them to implement a Just In Time (JIT) delivery system to reduce traffic congestion in the streets around the project. A one-way system of approach will be implemented to prevent reversing and limiting manoeuvring of the vehicles servicing the project.

To minimise the likelihood of congestion during the construction period, strict monitoring and control of vehicles entering and egressing the sites will be implemented. Construction deliveries will be carefully planned with delivery times agreed with each sub-contractor and supplier using a booking system. Delivery schedules will be produced to look at the profiles of up-and-coming deliveries, and to regulate deliveries and eliminate bottle necks.

GBC Environmental Protection and KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

Loading and unloading of plant and materials away from the maintainable public highway

The loading area would be in the centre of the site – the large green square in the below diagram:



It is therefore well away from the maintainable public highway. KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

Parking and turning areas for construction and delivery vehicles and site personnel

It is stated that the location and the size of the development allow for workers and visitors to park their vehicles inside the site boundaries and that the anticipated on-site parking spaces are 25 with 20 for site personnel and 5 for visitors.

KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

Type and location of wheel washing and chassis cleaning facilities - Temporary traffic management/signage.

Secure access points with wheel cleaning facilities will be established at the site access and egress Gate; a speedy hire jet washer/bowser facility will be provided.

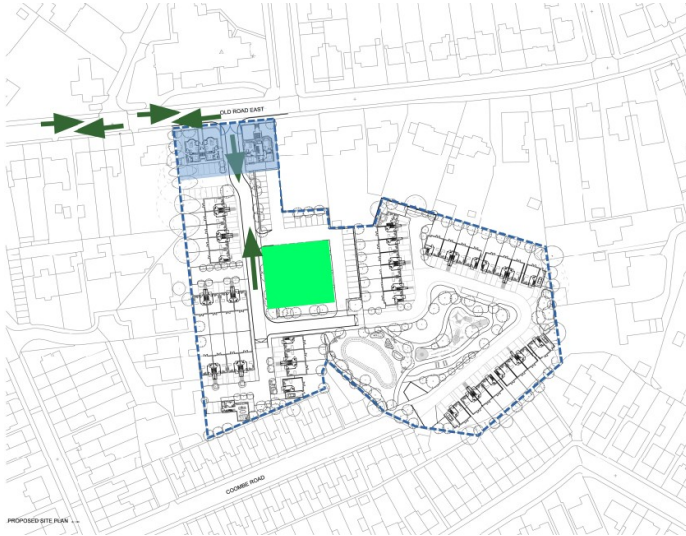
Strict monitoring and control of vehicles entering and egressing the sites will be implemented.

KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this element.

(d) Details of the location of the proposed construction compound

It is stated that the construction site office and associated welfare facilities for the workforce will be

established inside the site boundaries at the location indicated in the sketch of Appendix 1. This is the purple area at the front of the site:



In the centre of the site this is as away from neighbouring properties as it can be. GBC Environmental Protection and KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this part (d).

(e) Details of security fencing and other site security measures

Hoarding to site frontage will be fencing of 2.4m in height, with clear pedestrian warning signs and the required notices of Contractors Contact details. The hoarding location would be where the blue dashed line is in the below plan:



2.4m hoarding is considered acceptable for a construction site, it will be temporary, will secure the site and protect neighbouring properties as much as possible from the construction.

It is considered that acceptable details have been submitted in relation to this part (e).

(f) Details of stockpile areas for building materials or for fill or removed topsoil

They will have the implementation of a 'just-in-time' material delivery system to avoid materials being stockpiled.

The green square area in the centre of the site is the loading area. It is stated that excavated material will

be 100% recycled with the re-use of excavated soil for landscaping.

It is considered that acceptable details have been submitted in relation to this part (f).

(g) A Construction Drainage Design Plan to identify the required devices to prevent construction run off from flowing into existing drainage

The disposal of all waste or other materials removed from the Site will be in accordance with the requirements of the Environment Agency, Control of Pollution Act (COPA), 1974, Environment Act 1995, Special Waste Regulations 1996, Duty of Care Regulations 1991 and the Waste Management Regulations 2011. It is stated that water runs-offs will be regulated the appropriate Thames water Discharge licence will be put in place. It is stated that no substance will ever be discharged to a surface water drain; foul water drains may be used to dispose of some silty or foul water if the consent of the sewerage undertaker has been sought. Management of activities through method statements, toolbox talks and inductions will ensure the workforce are aware of the need to retain water quality. Activities like concrete pours and washing out the chutes must be managed effectively.

It is considered that acceptable details have been submitted in relation to this part (g).

(h) Ecological mitigation measures

It is stated that the CEMP will be updated to include ecological surveys to facilitate site clearance. It should be noted that condition 12 of planning permission ref. 20240013 states that:

'No development shall commence (including site clearance) until a Landscape and Ecological Management Plan (LEMP) has been submitted to, and approved in writing by, the Local Planning Authority. The Plan will include the following:

- Details of a diverse native-species only planting scheme (including initial planting of residential plots) to maintain and enhance biodiversity;
- Details of additional biodiversity enhancements to be provided including type, number and location of measures in accordance with Section 4.2, Table 8 of the Preliminary Ecological Appraisal, Arbtech, May 2023. Boxes for breeding birds will be targeted at those S41 priority species / red/amber listed species likely to occur within the development. Felled tree cordwood will be used to create standing deadwood features and log piles. All boxes included for wildlife will be Woodstone/woodcrete to ensure durability;
- Aims and objectives of management;
- Appropriate management prescriptions for achieving aims and objectives;
- Description and evaluation of all features to be managed;
- Details of information to be provided to residents regarding potential impacts of domestic pets on wildlife and proposed measures to limit such impacts (such as minimum heights for bat and bird boxes; dense thicket planting around nesting areas and log refugia);
- Constraints on site that might influence management;
- Proposals regarding remedial measures;
- Preparation of a work schedule including an annual work plan capable of being rolled forward over a five-year period, for the lifetime of the development;
- Details of the body or organisation responsible for implementation of the plan.

The LEMP will include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer, with details of the management body(ies) responsible for its delivery. The approved plan will be implemented in accordance with the approved details.

Reason In order to enhance the biodiversity of the site in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy (September 2014)."

The CEMP will be updated once the ecological mitigation measures for the development including site clearance have been dealt with under condition 12 of 20240013. As such it is considered that acceptable

details have been submitted in relation to this part (h).

(i) Measures to be undertaken to protect any public sewers and water apparatus

The Contractor will carry out the works in such a way that, as far as is reasonably practicable, the amount of spoil and waste (including groundwater, production water and run-off) to be disposed of is minimised.

It is stated that no substance will ever be discharged to a surface water drain; foul water drains may be used to dispose of some silty or foul water if the consent of the sewerage undertaker has been sought. Management of activities through method statements, toolbox talks and inductions will ensure the workforce are aware of the need to retain water quality. Activities like concrete pours and washing out the chutes must be managed effectively.

Potentially polluting substances will be stored in suitably bunded areas to reduce the potential for ground contamination and, therefore, groundwater contamination. If polluting substances penetrate the ground, the ground will be dug up and removed and replaced with a suitable replacement material. The polluted excavated material will be disposed of according to legislative requirements. This is to prevent redress under the Contaminated Land Regulations 2000 and remove any potential expensive clean-up claims. Absorbent material containing oil digesters will be stored on site for use on minor spillages. If a pollutant can be soaked up before it penetrates the ground, it should be. If a spill does occur a monitoring regime of the canals and rivers will be implemented to ensure the pollution does not reach the water courses and if it does it will be promptly and efficiently managed. The statutory bodies and client will be notified, and a clean-up operation begun as per the company procedures.

It is considered that acceptable details have been submitted in relation to this part (i).

(j) Details of vibration monitoring and mitigation during any necessary piling works

It is stated that a digital seismograph measuring device will be used to measure the amount of vibration produced during the works. Where elevated levels are recorded the source will be investigated and, where possible, alternative techniques employed to reduce the levels.

The Contractor shall also normally limit vibration levels arising from site activities at any residential building between 0800- and 1800-hours weekdays, 0900 to 1400 hours Saturdays.

Vibration levels will be monitored at:-

- 1mm/sPPV for occupied residential and educational buildings
- 3mm/sPPV for occupied commercial premises where work is not of an especially vibration sensitive nature or for potentially vulnerable unoccupied buildings
- 5mm/sPPV for other unoccupied buildings

It is stated that should any of these trigger points be noted, works will cease, and the works assessed to bring within compliance.

In planning work operations, it is said that the following will be considered to mitigate the effect of vibration:-

- Review of working methods to ensure that appropriate plant and methodology is being used to minimize vibration.
- Plan works so that sufficient breaks are allowed for, i.e. two hours on and two hours off.
- Ensure all plant and equipment is well maintained and located, as far as reasonably possible, away for sensitive receptors.

The Contractor will comply with the vibration levels established by agreement with Gravesham Borough Council which will consider BS 5228-2:2009+A1:2014.

GBC Environmental Protection and KCC Highways raise no objections and therefore it is considered that acceptable details have been submitted in relation to this part (j).

(k) Details of temporary construction or security lighting

Lighting to be provided in accordance with the Gravesham Borough Council licence. GBC Environmental Protection raise no objections and therefore it is considered that acceptable details have been submitted in relation to this part (k).

(l) Monitoring and review provisions with the Local Planning Authority

It is stated that this is a working document and will be developed as the project progresses; the updating will typically be carried out through the development of project specific risk assessment and method statement (RAM's) managed by the Principal Contractor. The details of the management plan will be subject to monthly review and audit and be referred to in all monthly site meetings, including the monitoring and recording of water (m3) arising from the use of construction plant, equipment (mobile and fixed) and site accommodation. All staff will be required to read and acknowledge the content of the plan and where appropriate specific training will be given with regard to any duties required. The Principal Demolition Contractor and Principal Construction Contractor will regularly review the CEMP to ensure it accurately reflects the enabling and construction works occurring on site, at a frequency of no less than six months (unless significant changes to the enabling and construction methodology occurs);

It is considered that the document shows that a strong regime of monitoring and review of the CEMP will be in place. It is therefore considered that acceptable details have been submitted in relation to this part (l).

(m) A Community Engagement Strategy covering how local residents, community groups and businesses will be kept informed about the development and construction timetable and works taking place, until completion of the development

It is stated that contact with neighbours and the general public throughout the demolition and construction programme will be pro-actively maintained, with regular update meetings and the issuing of a brief news sheet on progress. Update sheets will be maintained on site hoardings and contact information will be clearly displayed on site hoarding.

The Contractor will nominate a community relations personnel, who will be focussed on engaging with the local community. The Contractor will ensure that occupiers of nearby properties and residents are informed in advance of works taking place, including the estimated duration. The Contractor will inform local businesses and residents likely to be affected by such activities at least 14 days prior to undertaking the works, as well as applying for the appropriate permits and licences, e.g. vehicle crossovers or parking bay suspension.

To successfully develop and implement a 'Neighbour and Public Relations Strategy', the following actions will be undertaken:

- initial Contact: Once full planning permission has been obtained, Demolition and Construction contractors have been appointed, formal contact will be established with the nearest neighbours and those who could potentially be affected by the demolition and construction works; and
- Contact during Works Period: A single point of contact for neighbour and public relations will be established, with a senior member of the project staff nominated for the role. Contact details for this single point of contact will be displayed on the site hoarding. Outside normal working hours, site security will act as the main point of contact via a dedicated phone number. Security will alert the staff contact if necessary (available 24 hours). Should there be any complaints, these will be logged, fully investigated and reported to the relevant department within Gravesham Borough Council as soon as possible. The complainant will be informed as to what action has been taken.

In the case of work required in response to an emergency, Gravesham Borough Council and all neighbours will be advised as soon as reasonably practicable that emergency work is taking place. Potentially affected occupiers will also be notified of the 'hotline' number, which will operate during working hours.

It is considered that there would be strong community engagement with local residents. It is considered that acceptable details have been submitted in relation to this part (m).

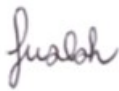
Conclusion

It is considered that sufficient information has been submitted for the partial discharge condition no. 3 of planning permission reference number 20240013, in so far as it relates to the construction of the residential element of the approved development only, which is all the area within the orange boundary line on the submitted drawing (un-numbered) – Proposed Site Plan Boundaries.

This partial discharge of condition 3 of planning permission reference number 20240013 does not include any of the areas of the application site which are outside of the orange boundary line (i.e. the doctor's surgery) for which approval of condition 3 still needs to be made. An informative to this effect will be required.

Recommendation: Approval of Details

See draft Decision

Case Officer:	Ms Rebecca Harrison	Team Leader:	Mrs Faye Walsh
Signed:	<i>Rebecca Harrison</i>	Signed:	
Dated:	22nd May 2026	Dated:	26 May 2026