



# TOTAL PLANNING

FAO Ms. Katherine Parkin,  
Planning  
Gravesham Council  
Delivered by email – [katherine.parkin@gravesham.gov.uk](mailto:katherine.parkin@gravesham.gov.uk)

13/02/2026

Dear Ms. Katherine Parkin,

**Re: Application Reference 20250596 - Land at Dalefield Way (West),  
Gravesend, Kent, DA12 2FL - Discharge of Conditions 2, 3, 9, and 10.**

We write on behalf of O'Halloran & O'Brien Ltd to formally submit details in order to discharge Conditions 2, 3, 9, and 10 attached to the planning permission granted on 23 January 2026.

The following documents are submitted in support of this application:

- Construction Environmental Management Plan (CEMP) – Version 2 (13 February 2026)
- Construction Dust Management Plan (Miller Goodall, Ref: 103322-2, dated 11 February 2026)
- Construction Environmental Management Plan (Ecology) (ACJ Ecology, February 2026)
- Wildlife Sensitive Lighting Strategy (ACJ Ecology, February 2026)
- Landscape Proposals Drawing MTC191P01 Rev 02 (Buffer Zone)
- 5-Year Landscape Maintenance Plan MTC191R01 Rev 00

A summary of how each condition is satisfied is set out below.

*Condition 2 – Construction Ecological Management Plan (Ecological CEMP)*

Condition 2 requires submission of a Construction Ecological Management Plan (CEMP) prior to groundworks, including biodiversity protection zones, mitigation measures, roles and responsibilities, and contingency procedures.



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Head Office:

37 Beresford Avenue, | Hanwell | London | W7 3AJ

Total Planning Ltd is the Trading Name of: Total Planning Ltd Registered in England and Wales No: 14659162.

E: [richard@totalplanning.co.uk](mailto:richard@totalplanning.co.uk)

T: 07803480461

W: [www.totalplanning.co.uk](http://www.totalplanning.co.uk)

The submitted Construction Environmental Management Plan (Ecology) prepared by ACJ Ecology fully addresses the requirements of the condition. The document includes:

- Identification and mapping of biodiversity protection zones, including the 8-metre buffer along the northern and western boundaries;
- Details of protective fencing (sweet chestnut fencing) and exclusion measures;
- Method statements covering dust and pollution prevention, sensitive lighting, breeding birds, and site monitoring;
- Appointment and responsibilities of a suitably qualified Ecological Clerk of Works (ECoW);
- Toolbox talks and contractor communication protocols;
- Contingency procedures should protected species be encountered.

The ecological mitigation measures are proportionate to the scale of the development and consistent with the Preliminary Ecological Appraisal and approved scheme. The submitted document therefore fully satisfies the requirements of Condition 2.

### *Condition 3 – Construction Environmental Management Plan (General CEMP)*

Condition 3 requires submission of a Construction Environmental Management Plan including a Dust Management Plan in accordance with Appendix D of the Air Quality Assessment, and reference to BS5228, BRE guidance and IAQM Guidance (2024).

The submitted documentation includes:

1. Construction Environmental Management Plan (CEMP) – prepared by O'Halloran & O'Brien Ltd, setting out:
  - Site establishment procedures;
  - Traffic management and delivery controls;
  - Noise and vibration management (with reference to BS5228);
  - Working hours compliant with the planning condition;
  - Pollution prevention and environmental controls;
  - Communication and complaints procedures.
2. Construction Dust Management Plan (Miller Goodall, Ref: 103322-2) which:
  - Identifies dust-generating activities (earthworks and trackout);
  - Identifies sensitive receptors including residential properties approximately 40m from site;
  - Provides IAQM-compliant mitigation measures;
  - Includes water suppression, daily visual inspections, record keeping and complaints procedures;
  - Confirms compliance with IAQM Guidance (2024).

Together, these documents comprehensively address the requirements of Condition 3 and demonstrate that construction impacts on local residents will be appropriately managed and minimised.

### *Condition 9 – 8 Metre Buffer Zone Along Watercourse*

Condition 9 requires submission of a scheme for the provision and management of an 8-metre-wide buffer zone, including planting, protection during construction, and long-term management arrangements.

The following documents address this requirement:

- Landscape Proposals Drawing MTC191P01 Rev 02
- 5-Year Landscape Maintenance Plan MTC191R01 Rev 00

The Landscape Proposals drawing clearly identifies and delineates the 8-metre buffer along the northern and western boundaries. The scheme:

- Retains existing ground flora where present;
- Introduces native planting mixes (M1 and M2) comprising locally appropriate tree, shrub and wetland species;
- Specifies planting densities and stock sizes;
- Provides timber chestnut fencing (900mm high) to protect the buffer during construction;
- Excludes built development, lighting and formal landscaping from within the buffer zone.

The accompanying 5-Year Landscape Maintenance Plan sets out:

- Ongoing maintenance operations;
- Replacement of failed planting;
- Management responsibilities;
- Establishment and long-term biodiversity objectives.

These documents demonstrate that the buffer zone will be protected during construction and appropriately managed thereafter, thereby fully satisfying Condition 9.

### *Condition 10 – Detailed Lighting Plan*

Condition 10 requires a detailed lighting plan including location, specification, lux contours and demonstration of compliance with Bat Conservation Trust Guidance Note 08/23.

The submitted Wildlife Sensitive Lighting Strategy (ACJ Ecology, February 2026) provides:

- Location plan showing lighting positions;
- Specifications for downward-facing, low-level, motion-sensor controlled lighting;
- Identification of retained dark corridors adjacent to marshland habitats;
- Compliance with Institution of Lighting Professionals Guidance Note 08/23;
- Confirmation that lighting does not extend beyond site boundaries;
- Ongoing monitoring and remedial measures.

The strategy confirms that key habitats, commuting routes and foraging areas will remain unlit and that light spill will be minimised. The proposals therefore fully comply with Condition 10.

### *Conclusion*

The submitted documentation provides comprehensive and policy-compliant information addressing all elements of Conditions 2, 3, 9, and 10.

We respectfully request that the Local Planning Authority confirms the formal discharge of these conditions at the earliest opportunity.

Should any clarification be required, please do not hesitate to contact us.

Yours sincerely,



Richard Conroy BSc MSc (TP)  
Director  
Total Planning

[richard@totalplanning.co.uk](mailto:richard@totalplanning.co.uk)  
[www.totalplanning.co.uk](http://www.totalplanning.co.uk)