



TOTAL PLANNING

FAO Ms. Katherine Parkin,
Planning
Gravesham Council
Delivered by email – katherine.parkin@gravesham.gov.uk

17/02/2026

Dear Ms. Katherine Parkin,

**Re: Application Reference 20250596 - Land at Dalefield Way (West),
Gravesend, Kent, DA12 2FL - Discharge of Conditions 4, 5, 6, 7, and 11.**

We write on behalf of O'Halloran & O'Brien Ltd to formally submit details in order to discharge Conditions 4, 5, 6, 7 and 11 attached to the planning permission granted on 23 January 2026.

We note that Condition 11 was not included within the previous discharge submission and is therefore now submitted as part of this application.

The following documents are submitted in support of this application:

- Geo-Environmental Report (Planning Conditions 4, 5 & 6 Submission) – Manhire Associates, Project No. 24054, Rev 0, dated 17 February 2026
- Technical Note – Acoustic Barrier – Syntegra Consulting, dated 13 February 2026
- Drawing 0-3-01 Site Layout West (Fence)

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

Condition 4 – Contaminated Land Assessment & Remediation Strategy

Condition 4 requires a contaminated land site investigation, risk assessment, and where necessary, a remediation strategy in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance.

The submitted Geo-Environmental Report (Rev 0) prepared by Manhire Associates includes:



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- A review of the approved Phase 1 Desk Study;
- A detailed intrusive site investigation comprising twelve trial pits to depths of up to 2.5m;
- Laboratory testing for metals, PAHs, TPH, VOCs, phenols and asbestos;
- Photo Ionisation Detector (PID) screening across all samples;
- Risk assessment against CLEA Soil Guideline Values (commercial and residential screening levels);
- Consideration of risks to controlled waters;
- A Remedial Action Plan;
- A Discovery Strategy and Watching Brief procedure;
- Validation requirements for imported soils and materials.

The investigation confirmed that contaminant concentrations were below relevant commercial and residential trigger levels and that remediation is not warranted. The report concludes that the site is suitable for the proposed B8 yard use without remediation.

The submission therefore satisfies parts (a) and (b) of Condition 4. Parts (d) and (e), relating to closure reporting and monitoring, are post-completion requirements and will be complied with in due course.

Condition 5 – Contamination Not Previously Identified

Condition 5 requires that if previously unidentified contamination is discovered during development, works must cease and a remediation strategy be agreed.

Section 11 of the Geo-Environmental Report sets out a comprehensive Discovery Strategy and Watching Brief, including:

- Clear reporting procedures;
- Stop-work protocols;
- Notification procedures to the Planning Authority and Environmental Health;
- Emergency response measures;
- Post-remediation verification reporting requirements.

This satisfies the requirements of Condition 5 and ensures a robust mechanism is in place should unexpected contamination be encountered.

Condition 6 – Infiltration Drainage Restriction

Condition 6 prevents infiltration drainage unless supported by an assessment of risks to controlled waters.

The Geo-Environmental Report confirms:

- Underlying strata comprise Made Ground over Alluvium;
- No significant contamination was identified;
- All results are below trigger concentrations;
- Risk to controlled waters is considered highly unlikely;
- Contaminants identified are of low leaching potential;

- Alluvial clay deposits provide a low permeability barrier.

The assessment within the report therefore demonstrates that risks to controlled waters are negligible. Any surface water strategy will operate in accordance with the approved drainage details under Condition 7 (see below).

Condition 7 – Detailed Surface Water Drainage Scheme

Condition 7 requires submission of a detailed surface water drainage scheme demonstrating no increased flood risk, appropriate pollution control and long-term management.

The approved drainage strategy forms part of the wider technical submission and confirms:

- Hardstanding drainage via ACO channel drains;
- Connection to a petrol interceptor;
- Discharge to the existing swale along the north-east boundary;
- Controlled outfall arrangement;
- No reliance on infiltration systems;
- Appropriate pollution prevention measures;
- Maintenance responsibilities embedded within the operational management of the yard.

The scheme ensures there will be no increase in off-site flood risk and provides suitable pollution control consistent with the findings of the geo-environmental assessment.

Accordingly, Condition 7 can be discharged.

Condition 11 – Acoustic Fencing Details

Condition 11 requires details of acoustic fencing along the Dalefield Way frontage.

The following documents address this requirement:

- Technical Note – Acoustic Barrier (Syntegra Consulting)
- Drawing 0-3-01 Site Layout West (Fence)

The Technical Note confirms:

- Installation of a continuous close-boarded timber fence along the southern boundary;
- Solid construction with no gaps;
- Minimum surface mass of approximately 10–15 kg/m²;
- Installation with no air gaps at ground level;
- Height sufficient to break line of sight between source and receptors;
- Expected acoustic attenuation of approximately 10 dB;
- Revised BS4142 assessment demonstrating compliance with local authority criteria, with rating levels 7 dB below background sound levels at the worst-case receptor.

Drawing 0-3-01 clearly illustrates the proposed fencing arrangement and location.

The submitted information therefore demonstrates that the acoustic barrier will achieve meaningful attenuation and protect residential amenity, satisfying Condition 11.

Conclusion

The submitted documentation provides comprehensive technical evidence demonstrating compliance with Conditions 4, 5, 6, 7 and 11 of planning permission ref. 20250596.

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

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

Yours sincerely,

A handwritten signature in black ink, reading 'Richard Conroy' in a cursive script.

Richard Conroy BSc MSc (TP)
Director
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