MILTON PLACE, GRAVESEND

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

April 2026

The Hill Group

MILTON PLACE, GRAVESEND

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

CONTROLLED DOCUMENT

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MILTON PLACE, GRAVESEND

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1. INTRODUCTION

1.1 This Construction Environmental Management Plan (CEMP) has been prepared by Paul Basham Associates on behalf of Hill Group to satisfy a proposed planning condition associated with an application to Gravesham Borough Council (GBC) for up to 76 residential dwellings at Milton Place Car Park, Gravesend under planning reference 20250167. The site location is identified in red within **Figure 1**.

Figure 1: Site Location

1.2 The application is currently pending consideration, however the committee report, dated 30th July 2025, recommended approval subject to the finalisation of the internal layout, finalisation of planning conditions and completion Section 106 legal agreement.

1.3 Within the committee report, a number of conditions were recommended as part of the planning approval. One such condition is Condition 4, which reads:

'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 routing of construction and delivery vehicles to/from the 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 site personnel*
- *Type and location of wheel washing and 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 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 securing lighting

(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.

1.4 This CEMP has therefore been prepared in order to outline how construction will be managed and discharge Condition 4 of the planning consent.

2. EXISTING SITE CONDITIONS

2.1 The site currently consists of Milton Place Car Park which is managed by Gravesham Borough Council, as well as a skate park and public open space.

2.2 The site is bound by Milton Place to the west and Ordnance Road to the south. Immediately north of the site is the Riverside Leisure Area and Khartoum Place and to the east the site is separated from Canal Road by a private residential dwelling which is served via Gordon Gardens.

2.3 The site currently comprises two car parks with a total of 178 spaces, an area of open space and a skatepark. The existing Milton Place Car Park is currently accessed through the Ordnance Road Car Park which is accessed from Ordnance Road on the southern boundary of the site. Previously, access to the Milton Place Car Park could also be taken from Khartoum Place in the northwest corner of the site, however this has been temporarily blocked to prevent through traffic.

2.4 Milton Place is one-way from the signalised junction with the A226 Milton Road and Ordnance Road north for c. 150m until it meets East Terrace and Khartoum Place at the northwestern corner of the site. From that point it becomes two-way for the remaining c. 125m up to its junction with The Terrace. Milton Place is subject to a 30mph speed limit for its entirety.

2.5 Ordnance Road borders the site to the south and runs east/west between the Milton Place/Ordnance Place/A226 Milton Road signalised crossroads to the west to the junction with Albion Terrace c. 250m to the east. At the point that it meets Abion Terrace, Ordnance Road becomes Canal Road and continues northeast. Ordnance Road is two-way and is also subject to a 30mph speed limit and serves the parking spaces via an in/out arrangement. Both Ordnance Road and Milton Place benefit from footways on both sides of the carriageway.

2.6 From the Milton Place/Ordnance Road/A226 Milton Road signalised crossroads there are a number of options to route south towards the Strategic Road Network (SRN) at the A2, from which the M2 can be accessed.

Personal Injury Collision Data

2.7 Personal Injury Collision (PIC) data was obtained from Kent County Council for inclusion within the Transport Assessment submitted as part of application. This was obtained for the most recently available five-year period, running from June 2019 to June 2024 for the local highway network surrounding the site. The study area and resultant PIC data has been extracted from the Transport Assessment and is demonstrated in **Figure 2**.

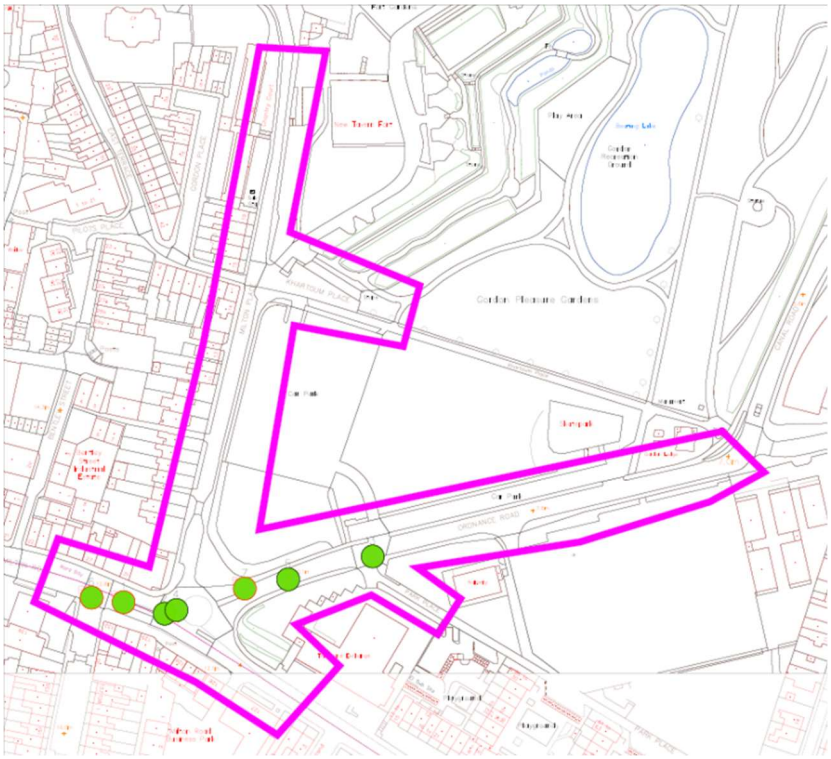

Figure 2: Personal Injury Collision Data

2.8 As shown in **Figure 2**, this exercise demonstrated that a total of 7 incidents were recorded within the scope of the assessment, with all of these classified as slight in severity (as indicated by the green circles). It should also be noted that no incidents were recorded between August 2022 and June 2024.

2.9 As concluded in the TA, a total of 7 incidents in 5 years – all of which were slight in severity and had a variety of causes – is not considered to indicate an existing highway safety concern which is likely to be exacerbated by the proposed development.

3. PROPOSED DEVELOPMENT

3.1 The application seeks permission to build 76 residential units, with 61 of these affordable apartments and 15 private houses. The capacity of the Milton Place and Ordnance Road car parks will be reduced to facilitate the proposed development, with the existing skate park to be retained. A site layout plan is shown at **Appendix A.**

Trip Generation

Construction Phase

3.2 The construction programme is anticipated to be 94 weeks plus an additional 6 weeks of enabling works, equalling a total of 25 months. There will be a tower crane on site for the duration of the construction period for the construction of the tower block, with a forklift for the construction of the houses. There will also be various plant vehicles required throughout the construction period, such as mini diggers, 13t JCBs, piling rigs and dumpers.

3.3 There will be daily deliveries to the site, with these spread throughout the day and ranging from deliveries of small welfare items to larger deliveries of construction materials. It is anticipated that there will be between 20-40 deliveries per day.

3.4 Deliveries to and from the site will be managed by construction staff to ensure that instances of HGVs concurrently coming in and out of the site at the same time are avoided.

3.5 As set out later in this report, the site will be operational on Saturdays as well as weekdays, however HGV movements will not be undertaken on the weekends unless absolutely necessary and discussed in advance with the local residents if appropriate.

3.6 In addition to the deliveries there is anticipated to be up to 85 operatives working on site during peak times of the construction period, with the peak anticipated to be in the summer months. There is anticipated to be some lift sharing for travel to and from the site and public transport options will be highlighted to people working on site, however for a robust assessment an absolute worst-case scenario assumes that there will be 85 cars or LGVs arriving and parking off site in the surrounding area in the morning before leaving at the end of the day.

3.7 The location of where staff will travel from is unknown at this stage given that this is dependent on the appointed contractor. The traffic movements associated with the construction workers will occur before the start of the day (08:00), with workers departing at the end of the day (18:00) which will be outside the traditional network peak hours of 0800-0900 hours in the AM and 1700-1800 hours in the PM.

3.8 The 25-month construction phase is a robust estimate of the construction time and could be less in reality. The impact of the construction period will be carefully managed and therefore the effect on the local road network will be negligible.

Access Arrangements

3.9 A new vehicular access is proposed to serve the residential units from Milton Place which will require the relocation of 3 parking spaces on Milton place further north and the loss of 2 parking spaces. This access will be in the form of a bellmouth junction, with build outs on either side of the access road to maximise visibility and minimise the impact of the new junction on Milton Place.

3.10 It has been agreed with KCC that a junction radius of 1:21 will be used, with vehicle tracking submitted within the TA to demonstrate that the proposed access can accommodate a large family car, a refuse vehicle and a fire tender.

3.11 There are a number of options for pedestrians and cyclists to access the site. A new pedestrian and cycle access is proposed from Milton Place, with an additional link provided into the Milton Place Car Park and a new cycleway on the eastern side of Milton Place between the proposed site access and the Milton Place/Ordnance Road/A226 Milton Road signalised crossroads. A pedestrian footpath connection will also be provided onto Ordnance Road to the west of the Ordnance Roar Car Park.

3.12 For the purposes of construction, it is proposed that the existing access to the car park from Ordnance Road will be used until the new site access on Milton Place is constructed. From that point on, the new site access will be used as the construction access.

4. SITE ACCESS, COMPOUND AND LAYOUT

Site Layout Plan

4.1 A site plan is contained within **Appendix A**. This shows that a welfare unit will be provided towards the northern extent of the site on an area of hardstanding. This unit will be equipped with office and toilet facilities, as well as the storage of small materials.

4.2 All vehicles will also remain on these areas of hardstanding except those that arrive on transporters such as the telehandler, post driver or direct drilling machine and therefore no mud will spill onto the local road network.

Parking

4.3 All vehicle parking associated with construction will take place off site, with the public parking available in the surrounding area able to accommodate this.

5. CONSTRUCTION TRAFFIC AND ROUTING

5.1 The local road network has been assessed in terms of suitability for the movement of HGVs to and from the site.

Route from Strategic Road Network

5.2 As set out previously, the site benefits from having access to the Strategic Road Network (SRN) in either direction from the site access, with the B3004 to the northeast and the B3006 to the west.

5.3 For construction, it is anticipated that construction traffic will exit the M2 at Junction 1 to connect to the A289. Vehicles will then travel northeast along the A289 until the Gads Hill Interchange, from where there will route via the A226 Gravesend Road.

5.4 The A226 Gravesend Road provides a 6.6km route from the Gads Hill Interchange until it becomes the A226 Milton Road c.400m prior to the Milton Place/Ordnance Road/A226 Milton Road signalised crossroads at the southwest of the site. At this point, construction traffic will turn right onto Milton Place to use the one-way route to the site access. The dashed red line within **Figure 3** displays the proposed HGV route from the SRN to the site.

Figure 3: Proposed Construction Traffic Routing

5.5 This route is suitable for all of the anticipated temporary construction vehicles needing to access the site and is not anticipated to have an adverse effect on the operation of the local road network given the infrequent number of construction vehicle trips expected (see **Section 3**).

6. CONSTRUCTION TRAFFIC MANAGEMENT AND MITIGATION

Working Practice on-site

6.1 All materials will be stored within the construction compound, loaded and unloaded safely by trained personnel. A minimum requirement for PPE is hard hat, Hi-Vis and steel capped boots, with additional PPE to be worn for specific tasks as denoted in the contractor's RAMS. In addition, all site visitors will be required to sign in at the site office to ensure adequate safety measures are met. The site will be contained within a CDM area and will be fenced off from the public or unwanted access.

Working Hours

6.2 The construction phase is expected to last approximately 23 months, with the site working hours set out below.

- 08:00-18:00 Monday to Friday;
- Saturdays 08:00-13:00; and
- No working on Sundays and Public Holidays.

6.3 During the construction period it may be necessary in exceptional circumstances to work outside these prescribed working hours. Should this occur, the hours and duration of these works will be subject to consultation with KCC and local residents.

6.4 Each morning the site will be visited by an operative who will open the proposed gate, and then at the end of the day the gate will be closed to ensure that the site cannot be accessed by members of the public.

Management of Deliveries

6.5 Delivery vehicles wanting to deliver materials to the site will be provided with an allocated timeslot to ensure the number of delivery vehicles are managed appropriately as per Section 5 and no delivery vehicles would be waiting on Milton Place or the surrounding roads.

Use of Traffic Marshals

6.6 Traffic Marshals are operatives trained to direct vehicle movement on or around the site. Construction vehicles accessing and egressing the site from Milton Place will be assisted by traffic marshals to ensure this manoeuvre is conducted in a safe manner.

Wheel Washing Facilities

6.7 To ensure that mud and debris is not carried onto the surrounding highway network, wheel washing facilities will be provided on site for the entirety of the construction period. The wheel washing station will be located close to the site access to reduce dirt and dust. A vehicle marshal will be used to inspect

the wheels of all vehicles prior to leaving the site, and to hose off mud, dust or silt contaminate prior to the vehicle leaving the site. A mechanical powered jet wash will be used as it is more controllable than other methods and uses less water. Water arising from the wheel cleaning will be filtered within the site prior to being positively drained. No water arising from the wheel cleaning will discharge onto the public highway.

6.8 In the event that either the nature of the works or weather conditions mean there is a likelihood of wheel washing not being sufficient then a road sweeper would be employed at the developer/contractor's expense.

Dust Management

6.9 Dust mitigation measures will be reviewed will be reviewed in accordance with the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from construction. The site will look to adopt proportionate measures where applicable, consisting of:

- A site logbook maintained to record complaints and actions taken;
- The site team will undertake a dust risk assessment depending on weather conditions and programmed works;
- A site contact number will be displayed at the site boundary; and
- All staff will receive a toolbox talk covering dust mitigation

Activities and Controls

6.10 Cutting, grinding and breaking activities will be minimised and undertaken using hand tools where practicable.

6.11 Materials prone to dust generation will be kept covered or stored in designated areas or used with dust bags and water dampening where practical.

Practical Mitigation

6.12 Water suppression (e.g. handheld hose or bowser) will be used during dry or windy conditions where dust may be generated.

6.13 Damping down of haul routes and working areas during dry weather.

6.14 Stockpiles will be located away from site boundaries where reasonably practicable and in extreme conditions, tarpaulin could be used to cover if needed.

Noise Mitigation

6.15 Noise will be managed on site as set out below, using measures in accordance with the principles of Best Practice Means as set out in BS 55228-1:2009+A1:2014. The site will implement standard construction noise practices appropriate to the scale and duration of works.

Plant and Equipment

6.16 All plant will be well maintained and fitted with appropriate silencers or mufflers.

6.17 Plant will be switched off when not in use, rather than left idling.

6.18 Use of handheld or smaller plant where practicable instead of heavier equipment.

Working Methods

6.19 Noisy activities will be sequenced and programmed to avoid prolonged continuous noise.

6.20 Stationary plant will be positioned as far as practicable from receptors

6.21 Use of temporary screening formed by site hoarding, stored materials, or existing structures where possible (no bespoke acoustic barriers).

Site Management

6.22 Neighbours will be given advance notice of particularly noisy short-term activities where reasonably practicable.

Dust and Noise Management Summary

6.23 The proposed mitigation measures are consistent with recognised industry guidance and reflect a proportionate approach to noise and dust control for the scale of the development, without requiring intrusive monitoring or specialist intervention.

6.24 A Social Value and Community Manager will be in frequent contact with the surrounding residents and community, notifying them on upcoming works that may be louder or cause an increased amount of dust.

6.25 QR codes will be displayed outside of site and will be available for residents to get into contact with the Social Value and Community Manager.

Inspection of Signage

6.26 The site supervisor, or somebody appointed by them, will check the security hoarding and any scaffolding on a daily basis. This is to ensure these are in the correct place and are not creating a hazard to road users.

Consultation with Local Residents

6.27 The applicant recognises it is important to ensure residents are aware of the construction traffic and residents' comments regarding construction traffic are addressed. Local residents will be provided with information on when construction work will commence and end and dates and times of abnormal loads and convoy times.

Air Pollution

6.28 Air pollution will be controlled through regular maintenance of plant and additional servicing when required. All plants will be switched off when not in use. Substances emitting strong odours will be investigated for an alternative equivalent product. In addition to this, there is a presumption of water-based paints both internally and externally.

7. SUMMARY AND CONCLUSIONS

7.1 This Construction Environmental Management Plan (CEMP) has been prepared by Paul Basham Associates on behalf of Hill Group to satisfy a proposed planning condition associated with an application to Gravesham Borough Council (GBC) for up to 76 residential dwellings at Milton Place Car Park, Gravesend under planning reference 20250167.

7.2 The application is currently pending consideration, however the committee report, dated 30th July 2025, recommended approval subject to the finalisation of the internal layout, finalisation of planning conditions and completion Section 106 legal agreement. Condition 4 of the committee report stipulated that a Construction Environmental Management Plan was required as part of any planning consent.

7.3 Milton Place borders the site to the west and is a one-way road 30mph road that connects with the A226 Milton Road and Ordnance Road at a signalised crossing to the south and The Terrace to the north. Ordnance Road borders the site to the south and runs east/west between the Milton Place/Ordnance Place/A226 Milton Road signalised crossroads to the west to the junction with Albion Terrace c. 250m to the east. At the point that it meets Abion Terrace, Ordnance Road becomes Canal Road and continues northeast. Both Ordnance Road and Milton Place are 30mph roads that benefit from footways on both sides of the carriageway.

7.4 Personal Injury Collision (PIC) data was obtained from Kent County Council for the most recently available five-year period, with the scope including the entirety of Milton Place and Ordnance Road and the signalised junction at which both roads meet the A226 Milton Road. This data showed that there were 7 incidents of slight severity within the scope of the study area, with none of these occurring between August 2022 and June 2024. This demonstrates that there is not an existing pattern of accidents that are anticipated to be exacerbated by construction of the development.

7.5 The HGV route uses the A289 (northeast bound), before using the Gads Hill Interchange to continue northwest towards the site via the A226 Gravesend Road. This route continues 6.6km before arriving at the Milton Place/Ordnance Road/A226 Milton Road signalised crossroads, where construction vehicles will turn right onto Milton Place where the site access is located.

7.6 It is proposed that the existing Ordnance Road car park access will be used as the construction access until the proposed development site access onto Milton Place is implemented. From that point onwards, construction traffic will use the Milton Place access.

7.7 During the construction phase (which is anticipated to last approximately 25 months) there are anticipated to be up to 85 operatives on site a day in peak construction periods. Construction workers

will be expected to utilise the public parking available in the vicinity of the site to park each day. Construction workers will be provided with information regarding the available parking prior to arriving on site.

7.8 There will be a tower crane and forklift truck on site for the duration of the construction period, with a variety of other construction vehicles also required during the construction period. There will be between 20-40 daily deliveries that will be spread throughout the day, ranging from small welfare items to larger construction materials. Further details of this can be provided within a final CTMP to be agreed by condition prior to construction and this can therefore be confirmed by Hill Group once planning matters are resolved. This enables final details to be agreed at this point. The applicant would be amenable to this solution if the planning officer considers it suitable.

7.9 A number of other measures will be implemented to ensure safety and reduce disturbance from construction traffic. These include:

- Restricting working hours from 08:00-18:00 Monday to Friday and no deliveries during network peak periods;
- Restricting working hours from 08:00-13:00 on Saturdays, with this limited to light construction traffic only and no operation of HGV convoy system
- Use of traffic marshals for access and site movements;
- Management of deliveries onto the site using allocated time slots and formal traffic management;
- Regular inspections of safety hoarding, scaffolding and signs; and
- Consultation with local residents.

7.10 Whilst some disruption is inevitable, it is considered that the above measures will provide significant steps to ensure the effects of construction traffic on the local road network are minimised as a result of this modest development. Post-construction the proposals are anticipated to lead to a betterment to the operation of the local road network and therefore we would encourage the local planning and highway authority to look favourably upon this development in relation to highways.

Appendix A

SITE-SET-UP PLAN

EXISTING CAR PARK HERAS FENCED OFF UNTIL PROPOSED CAR PARK ADAPTIONS ARE COMPLETE

NEW HOARDING LINE WHEN PROPOSED CAR PARK ALTERATIONS ARE COMPLETED

EXISTING ACCESS TO BE UTILISED UNTIL NEW MILTON PLACE ACCESS IS COMPLETED

OASIS — 1NO. EXISTING DISABLED BAY TO BE STOPPED-UP; THIS WILL BE THE POSITION OF THE TEMPORARY OASIS UNIT - APPROX 3MTHS

HOARDING LINE

COMPOUND/WELFARE/SKIPS/SMALL MATERIALS + GANTRY

POSTPATH

SITE BOUNDARY

PEDESTRIAN GATE

VEHICLE GATE

POTENTIAL VEHICLE GATE FOR ACCESS TO SOIL STOCKPILE

POTENTIAL SOIL STOCK PILE

Notes

Do not scale from this drawing.
All contractors must visit the site and be responsible for taking and checking dimensions.
All construction information should be taken from figured dimensions only.
Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.
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Site Ownership Boundary

Gun Sight Lines

Rev	Date	Description	Drawn	Chkd
P4	03.07.25	Removal of Terrace	SOH	DF
P3	02.06.25	Third Issue	SOH	DF
P2	16.05.25	Second Issue	JTP	MM
P1	21.02.25	Planning Submission	JTP	MM

Drawing Status
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