

Planning Team
Gravesham Borough Council
Civic Centre,
Windmill St,
Gravesend
DA12 1AU

16th December 2025

Dear Ms Alison Webster ,

**Re: Condition Compliance for Northfleet Pulp Laydown and Associated Infrastructure
(20250406)**

Please find below and enclosed documents relating to the pre-commencement conditions relating to development application no. 20250406 for the Development of a pulp laydown area and associated infrastructure at Northfleet, Kent.

The conditions to be discharged are detailed below; they relate to the construction of Development of a pulp laydown area and associated infrastructure. RES, acting on behalf of Kimberly Clark, requests written approval from Gravesham Borough Council that the works shown on the plan are acceptable in relation to these conditions.

No.	Condition Wording	Condition Compliance
1	The development hereby approved shall be begun not later than 3 years following the date of this decision.	Noted
2	The development hereby permitted shall be carried out in accordance with the following schedule of approved plans.	Noted
3a)	No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.	Please see the attached Ground Investigation report provided by Erda Associates Ltd dated April 2025.

	a) A site investigation, based on the findings of the submitted Phase 1 Geoenvironmental Desk Study by GVR Geoservices Ltd dated 10/02/25 (Report Ref G22-049A Rev 1) shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.	
b)	A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.	Please see the attached Ground Investigation report provided by Erda Associates Ltd dated April 2025. Erda carried out a site investigation where slightly elevated levels of Dibenzo (a,h) anthracene were detected but no further contaminants were identified within 2 separate reports. The method statement for the expected contaminated lands has been included as evidence. In the event of additional contamination, the following shall apply; • Stop work immediately in the affected area. • Notify site management and environmental lead. • Undertake targeted sampling per BS10175. • Reassess the Conceptual Site Model (CSM). • Classify waste soils under WM3. • Notify regulators if risks to controlled waters or health exist. • Implement appropriate PPE and safe systems of work.
c)	Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.	
d)	Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning	The Principal Contractor will engage with the site investigation company who undertook the site investigation, to determine the methodology

	Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.	for removing the contaminated soil in accordance with BS10175. Noted – A closure report will be submitted to the local planning authority post construction.
e)	Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the Local Planning Authority.	Noted - The Site Operator will follow the recommendations as detailed in the ERDA report. We will follow the recommendation within the report if additional contaminated lands is discovered and if deemed appropriate, a monitoring and maintenance scheme will be developed in agreement with the local authority.
4)	The applicant shall undertake a watching brief during construction in case any contamination issue is encountered. If during development any contamination is found, the Local Planning Authority should be informed as soon as practical and the work shall not continue until written agreement is provided by the Local Planning Authority as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.	Noted. A watching brief will be undertaken during construction, and should any contamination be encountered, the appropriate steps indicated under condition 4 will be implemented.
5)	No development shall take place until a comprehensive Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The document shall be 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	Please see attached Northfleet Pulp Laydown Construction Environmental Management Plan (CEMP).
6)	Full details of any lighting proposed for the site, including light spill, shall be submitted to and	Noted

	approved in writing by the Local Planning Authority prior to its installation.	
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Kind regards,

Craig Allison

Development Project Manager - Hydrogen

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