

Construction Environment Management Plan

Northfleet Pulp Layout Area

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Revision History

Issue	Date	Name	Latest changes
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Contents

1	Introduction & Scope	4
1.1	Introduction	4
1.2	Description of the existing site and location	4
1.3	Proposed development	4
1.4	Indicative programme	4
2	Site Management	5
2.1	Construction facilities.....	5
2.2	Off-road parking.....	5
2.3	Deliveries.....	5
2.4	Import and export of materials	5
2.5	Traffic management	5
2.6	Site offices and storage of plant & materials.....	6
2.7	Temporary security fencing	6
2.8	Temporary lighting.....	6
2.9	Mud prevention measures.....	6
2.10	Wheel wash facilities.....	6
2.11	Dust suppression.....	6
2.12	Noise & vibration.....	7
2.13	Recycling / waste disposal.....	7
3	Construction Surface Water Management.....	8
3.1	Contamination sources	8
3.2	Potential receptors	8
3.3	Surface water management.....	8
3.3.1	Sediment control	8
3.3.2	Open excavation areas.....	8
3.3.3	Surface water pollution prevention	8
3.3.4	Wheel-wash setup and operation.....	9
4	Environment.....	9
4.1	Pollution control.....	9
4.2	Contamination remediation.....	9
4.3	Ecological mitigation.....	10
5	Public Consultation.....	11
5.1	Points of contact.....	11
	Appendix A – Drawings.....	12

Appendix B – Transport Statement 13

1 Introduction & Scope

1.1 Introduction

The principal objective of this document is to provide details of the proposed environmental management arrangements during the construction of the Northfleet Pulp Laydown Area.

1.2 Description of the existing site and location

The proposed development site is located within the Kimberly Clark Northfleet Paper Mill, which lies in the Kent borough of Gravesend on the southern bank of the Thames Estuary.

The planning boundary measures approximately 0.51 hectares.

Refer to drawing 05135-RES-LAY-DR-PT-010 included in Appendix A for the site location.

1.3 Proposed development

The proposed development comprises a concrete slab, a footpath, and associated fencing and drainage.

During the construction phase, temporary construction facilities will include a site office, welfare areas, parking and storage areas for plant and materials.

1.4 Indicative programme

Below is an indicative programme for the key project milestones.

	2026			
	February	March	April	May
Civil Works				
Fence and Barrier Installation				

2 Site Management

2.1 Construction facilities

Drawing 05135-RES-ACC-DR-PE-003 in Appendix A identifies the areas proposed for temporary on-site construction facilities.

Temporary on-site construction facilities will include a self-contained office and welfare unit/security gatehouse with an area for storage of large plant and materials. As the permanent works progress, the position of these facilities may vary. Welfare facilities shall comply with Construction (Design and Management) Regulations 2015.

2.2 Off-road parking

Drawing 05135-RES-ACC-DR-PE-003 in Appendix A identifies areas proposed for construction traffic off-road parking.

Off-road parking for construction traffic will be located within the northern papermill site. Vehicles will park either within existing papermill parking areas, or within a grassed area to the east of the proposed works which would be reinstated following the works if necessary.

In the event that additional parking is required, contractors' personnel will be requested to adopt alternative means of transport to minimise number of vehicles.

2.3 Deliveries

Heavy goods vehicles will offload within the main site or a temporary on-site construction area. The site manager will evaluate details of upcoming deliveries for each coming week and through discussions with hauliers will ensure that deliveries are spread out across each week and each day. This measure will ensure that no vehicles would have to wait on the surrounding public road network.

2.4 Import and export of materials

Every effort will be made to source materials locally wherever feasible, reducing the need for long-distance transport and supporting regional suppliers. Delivery routes will be planned to minimise travel distances and optimise logistics, helping to lower emissions associated with construction activities. Similarly, the movement of construction personnel will be organised to limit travel requirements, contributing to overall sustainability objectives and reducing the project's environmental impact.

Although transport by water was explored, the use of the River Thames for import and export has been deemed not feasible due to the unknown load restrictions of the existing wharf and docking area. As a result, river-based logistics cannot be safely incorporated into the project's transport strategy.

2.5 Traffic management

Document 05135-9506633 in Appendix B is the Transport Statement submitted as part of the Northfleet Pulp Laydown Area planning application. This report identifies the wider access routes to site from the A2 road to the south, for regular construction traffic as well as AILs.

Drawing 05135-RES-ACC-DR-PE-003 in Appendix A identifies the proposed routes for construction traffic to reach site from public roads. The drawing also identifies the areas proposed off-road parking for construction traffic.

In the event additional parking is required during the period of works where the number of contractors will be greatest, contractors' personnel will be requested to adopt alternative means of transport to minimise number of vehicles e.g. minibus or to park at other public parking areas, or in line with any other off-site private parking arranged by the contractor e.g. nearby business premises.

Clear signage will be erected at the site entrance showing access routes and parking locations.

2.6 Site offices and storage of plant & materials

Temporary construction areas are shown in 05135-RES-ACC-DR-PE-003 in Appendix A. Site offices will be temporary prefabricated structures. Materials will be stored in fenced laydown areas or containers as appropriate.

2.7 Temporary security fencing

Statutory health and safety signage shall be displayed at the site entrance together with the contact details of the Principal Contractor. No decorative displays will be used during the construction phase and there shall be no viewing areas for the general public.

The proposed works are taking place within an operational papermill site, with existing security and surveillance measures in place that provide an appropriate level of security for the works areas.

2.8 Temporary lighting

Temporary flood lighting maybe used during the construction process, during the winter months in hours of reduced light. All temporary lighting installations will be downward facing and all lights will be switched off during daylight hours when no work is been carried out.

2.9 Mud prevention measures

During the works, measures shall be in place to ensure that debris is not spread onto the adjacent public highway. The public highway will be regularly inspected, and any deposited debris or mud will be dealt with immediately by means of a road sweeper.

2.10 Wheel wash facilities

To prevent vehicles tracking mud and debris onto public roads during excavation and construction works wheel wash facilities will be used. For further details regarding wheel wash facilities please refer to Section 3.3.4 below.

2.11 Dust suppression

Dust management will be carried out in accordance with industry best practice to ensure that local receptors are not affected by nuisance levels of dust from the works.

The hierarchy for mitigation will be prevention, suppression then containment. The following measures will be implemented as required to restrict and control the movement for dust and other airborne pollutants within the site:

- Any stone running surfaces will be damped down using water bowser or other suitable system as required
- Site speed limits to be applied

- Vehicle loads to be covered as required
- Excavation and earthworks areas will be stripped as required to minimise exposed areas
- Any completed earthworks, stockpiles and other exposed areas will be covered with topsoil as soon as practical to stabilise surfaces.

Detailed measures implemented during the works shall follow guidance in *Control of Dust from Construction sites* (BRE DTi Feb 2003) and the Institute of Air Quality Management (IAQM) *Guidance on the Assessment of Dust from Demolition and construction*.

2.12 Noise & vibration

Noise and vibration related to construction activities will not result in any significant effects and will be below standard required thresholds.

Construction works are located within an operational papermill and there are no residential properties within the vicinity of the site.

Operating plant will be kept within the time periods and standards dictated for the site. Any non-compliant plant will be stopped and stood down until it can be rectified and/or removed from site.

The following mitigating measures will help to minimise potential noise and vibration effects on workers within the papermill site:

- Vehicles and machinery shall be switched off when not in use
- Correct fitting and maintenance of silencers and/or enclosures
- Avoiding excessive and unnecessary revving of engines

Any noise complaints will be immediately directed to the Site Manager. Depending on the nature of the complaint, the initial response could be to immediately cease the activity until suitable mitigation measures have been put in place and agreed with the affected party.

Detailed measures implemented during the works shall follow guidance in BS5228 *Noise Vibration and Control on Construction and Open Sites*.

The maximum noise levels expected 1 metre from the façade of any residential unit adjacent to the site is expected to be well below the applicable daytime noise limit of 65dB L_{Aeq} as defined in BS 52281:2009+A1:2014 due to the large distances of approximately 370 m and greater to neighbouring residences.

2.13 Recycling / waste disposal

Each contractor shall ensure the correct storage and disposal of all construction waste in accordance with Site Waste Management Plans. Waste shall only be removed from site by licensed carriers in possession of a current certificate of registration (Control of Pollution Act 1989). Copies of such certificates will be verified by each contractor as well as periodically checked by the Principal Contractor duty holder under Construction Design and Management Regulations 2015 (CDM).

Waste will only be transferred to a disposer licensed to receive the categories of waste involved, with the contractor undertaking spot checks to ensure this happens. Where practicable, types of waste will be streamlined/segregated for re-cycling and reuse.

Where required by the remediation strategy identified in 3.2, excavated hazardous waste will be removed from site and disposed of appropriately.

3 Construction Surface Water Management

The following sections aims to set out how surface water will be managed during the construction work for the pulp laydown area to prevent uncontrolled discharge of water from excavations and hardstanding, as well as protect watercourses and drains from pollution.

3.1 Contamination sources

The following potential sources of contamination have been identified for the project during the construction activities:

- Suspended solids/ fines laden runoff from exposed excavations,
- Suspended solids/ fines laden runoff from imported stone / materials.
- Suspended solids/ fines laden runoff from wheel washing.
- Contamination of groundwater and surface water runoff from site clearance / demolition works.

3.2 Potential receptors

The River Thames is located a minimum of 80m to the north of the proposed works areas. There is not a general slope in the ground between the proposed works and the River Thames.

Adjacent to the proposed works, a private surface water drainage network owned by Kimberly Clark receives surface water from adjacent roads and hardstanding areas. The Kimberly Clark drainage network conveys surface water to a 900mm diameter public surface water outfall sewer owned by Southern Water, which discharges into the Thames.

3.3 Surface water management

To protect the potential receptors identified in Section 3.2 from silt and other contaminants during construction, a series of control measures will be implemented to prevent, contain, or remediate contaminated surface water before reaching a potential receptor.

3.3.1 Sediment control

Silt fences, silt traps and berms will be installed around the construction works perimeter to contain sediment within any overland flow and prevent it reaching the existing surface water network.

Adjacent manholes and gullies will be protected with drain covers and sediment mats. These will be regularly inspected.

3.3.2 Open excavation areas

Sump pumping and / or well points will be utilised to remove surface water from open excavations. Pumped water will be routed through sediment control before discharging into the adjacent surface water network.

Excavations will be battered where appropriate. Where this is not possible, edges will be supported if necessary to prevent water-induced collapse.

3.3.3 Surface water pollution prevention

The discharge of contaminated water such as concrete, oils and chemicals into drains will be strictly prohibited.

Spill kits will be provided around areas for pumping, refuelling, and wheel washing.

All fuels and chemicals will be stored at least 10m from nearby watercourses and drains where possible.

3.3.4 Wheel-wash setup and operation

A handheld jet washer will be set up near to the excavation vehicular exit route. The wheel wash area will be marked by using barriers or cones.

Sediment control measures as detailed in Section 3.3.1 will trap sediment within the overland flow resultant from the wheel washing.

Use of detergents will be prohibited from the wheel wash process.

The operation of the wheel wash is anticipated to be as followed:

1. Vehicle enters wash area and comes to a complete stop.
2. Operator uses the jet washer to clean tyres, wheel arches, mud flaps, and lower chassis.
3. Clean from top downward to push debris to the ground.
4. Maintain 30–45 cm between nozzle and tyre.
5. Continue until no visible soil or debris remains.
6. Vehicle proceeds to final visual inspection near site exit.

4 Environment

4.1 Pollution control

Best practice measures will be implemented to minimise pollution due to construction operations. An emergency spill kit will be available on site and site operatives will be trained in its use. On site fuel tanks will be double skinned. Refuelling will take place over drip trays with a spill kit nearby.

All chemicals will be stored within a storage container with accompanying COSHH data sheets.

Contaminated water will be attenuated and treated if required prior to discharging into existing drainage routes.

Concrete will be washed out of delivery vehicles in a designated area, with mitigation in place to eliminate the risk of this contaminating ground water.

4.2 Contamination remediation

A ground investigation was undertaken within the proposed works area on 20 – 21 / 03 / 2025. The investigation identified a marginally elevated concentration of Dibenz(a,h)anthracene within shallow made ground in the northwest of the works area.

In line with recommendations identified in the ground investigation report, this contaminated material will either be excavated, removed from site and disposed of in accordance with relevant legislation, or capped with the proposed hardstanding. Before these remediation works commence, the remediation strategy and methodology will be submitted to and approved by the Local Authority.

Upon completion of the remediation works, a closure report shall be submitted to and approved by the Local Authority. The closure report will include:

- Details of the proposed remediation works,
- Proof of quality assurance and compliance with the approved methodology,
- Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria,
- Documentation detailing the waste material that has been removed from the site.

During the excavation works, if any areas of odorous, abnormally coloured or suspected contaminated materials are encountered, then operations shall cease, and the exposed materials shall be chemically tested. The works shall not continue in the area of the suspected contamination until an amended risk assessment and, if required, remediation and monitoring measures have been agreed.

4.3 Ecological mitigation

Works will be carried out incorporating the good practice recommendations outlined in the Northfleet Green Hydrogen Site Preliminary Ecological Appraisal 5956 Version 5.0:

- Directing lighting to where needed and avoiding light spillage (whether direct and / or indirect) as far as practicable.
- Limiting the times during which lighting is on to provide dark periods.
- Covering trenches or pits made during construction when unattended, or installation of a shallow angled plank to allow entrapped animals to escape.
- Capping the ends of any pipes, when unattended, to prevent animal access.
- Ceasing construction activities and contacting suitably qualified ecologist for advice should any protected or notable species be observed during works.

5 Public Consultation

5.1 Points of contact

A dedicated Community Liaison Officer will be provided to engage with residents throughout the construction phases of the project, and a regular point of contact assigned for the operational phase.

A dedicated project website is already available (northfleet-greenhydrogen.co.uk) and relevant points of contact will be added or amended as required.

Appendix A – Drawings

05135-RES-ACC-DR-PE-003	Proposed Access Route and Construction Support Areas	02
05135-RES-LAY-DR-PT-010	Site Location Plan	01

Appendix B – Transport Statement

05135-12316996 Northfleet Pulp Layout Area Transport Statement 01