



Paul Butler Associates

Planning, Development & Heritage Consultants

Kimberly-Clark Ltd

Northfleet Mill

Planning Statement

10 April 2026

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1. Introduction

Purpose of this Statement

- 1.1 This Planning Statement is prepared by Paul Butler Associates on behalf of the applicant, Kimberly-Clark. The statement is submitted in support of a full application on land at the Northfleet Manufacturing Site, Crete Hall Road, Gravesham.
- 1.2 The application seeks permission for the construction of a new boiler house with associated infrastructure and pipework. Hydrogen for the new boilers will be supplied by the local electrolyser sited on land within Kimberly-Clark's Northfleet Mill complex (already approved under 20250251). The new boilers proposed will utilise this green hydrogen to decarbonise the paper-making process used to manufacture toilet and facial tissue products. The green hydrogen will power the proposed dual-fuel boiler system within the new boiler house to generate the steam needed for paper manufacturing.
- 1.3 The proposed development therefore marks the critical phase in ongoing investment at the Northfleet Mill site as Kimberly-Clark seek to build clean energy infrastructure to decarbonise what is a hard-to-electrify, energy intensive industry.
- 1.4 This Planning Statement provides an overview of the development proposals, summarises the results of the various technical studies and provides a planning assessment to demonstrate that the application is compliant with relevant local and national policy.

Documents submitted with the Planning Application

- 1.5 The planning application is accompanied by a package of drawings prepared by Beam Consulting. In addition to the engineering design information, the following documents are also submitted in line with Northfleet Council's validation checklist. The application requirements were also agreed with the planning officer at the pre-application stage.

Supporting Documents

- Planning Statement (prepared by Paul Butler Associates).
- Air Quality Assessment (prepared by RSK).
- Noise Assessment (prepared by RSK).
- Preliminary Ecological Assessment (prepared by RSK).
- Biodiversity Net Gain Design Stage Report and Metric (prepared by RSK).
- Flood Risk Assessment and Drainage Strategy (prepared by RSK).
- Geo-Environmental Appraisal (prepared by Dunelm).
- Arboricultural Survey (prepared by Redbox)

Structure of this Statement

1.6 The remainder of this statement is structured as follows:

- Section 2 provides a description of the site and surrounding area and also reviews the planning history of relevance.
- Section 3 presents the proposed development for which planning permission is sought.
- Section 4 sets out the planning policy framework relevant to the site and the proposed development.

- Section 5 provides an assessment of the proposed development against the adopted policy framework, to clearly identify the reasons for granting planning permission.
- Section 6 provides a summary of the overall case for granting planning permission.

2. The Site and Surroundings

The Application Site

- 2.1 The proposed development site is identified on the site location plan (3001954-AME-NF-ZZ-DR-PL-6051 P2). The development site totals 0.41 hectares in size and includes the land and associated areas required for the installation of a new boiler house and associated pipework.

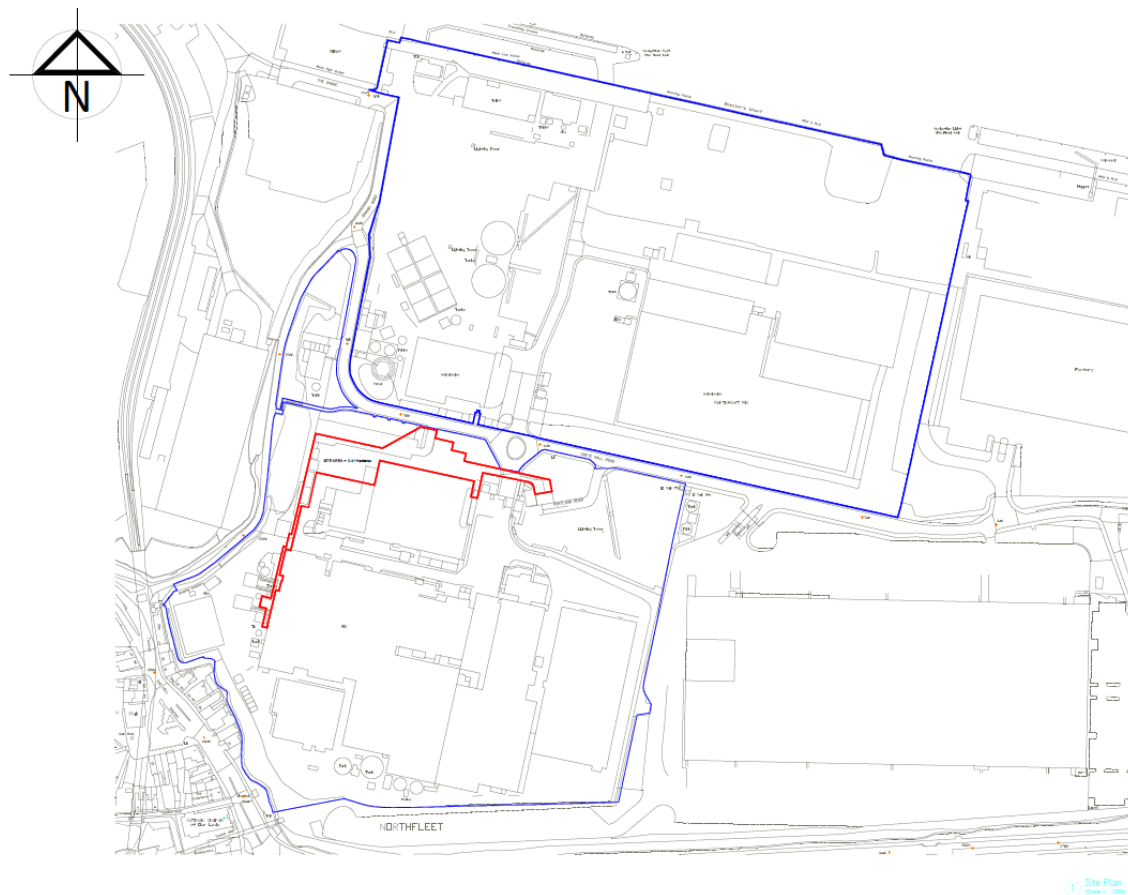


Figure 2.1: Site red line boundary

- 2.2 The site is situated on land to the south of Crete Hall Road. The site location is wholly within the ownership of Kimberly-Clark. The site edged red extends from close to Crete Hall road to the west and south, terminating at the Mill building. The site contains: an area of land, previously occupied by buildings which were demolished in 1999 and re-landscaped; areas

of hardstanding; and the former technical lab office building (a prior notification of demolition application ref 20260264 has been submitted to demolish this building). The levels across the site are generally consistent and the site can be regarded as previously developed land.

- 2.3 At present the existing site locality contains a disused car park which is separated by palisade fencing. Access into this area is possible from Crete Hall Road, however it is currently gated and secured. Access to the site otherwise is possible via the main factory entrance and internal site access route.
- 2.4 There is minimal vegetation within the site boundary with only a small tree and grassland present. Outside of the site boundary, to the north there is a dense line of scrub and hedgerow adjacent to Crete Hall Road which also contains a mature tree. The area is outside of the red line boundary and will not be impacted by the proposed works. Similarly to the east, a landscape area following the demolition of previous buildings contains further grassland and planted trees.

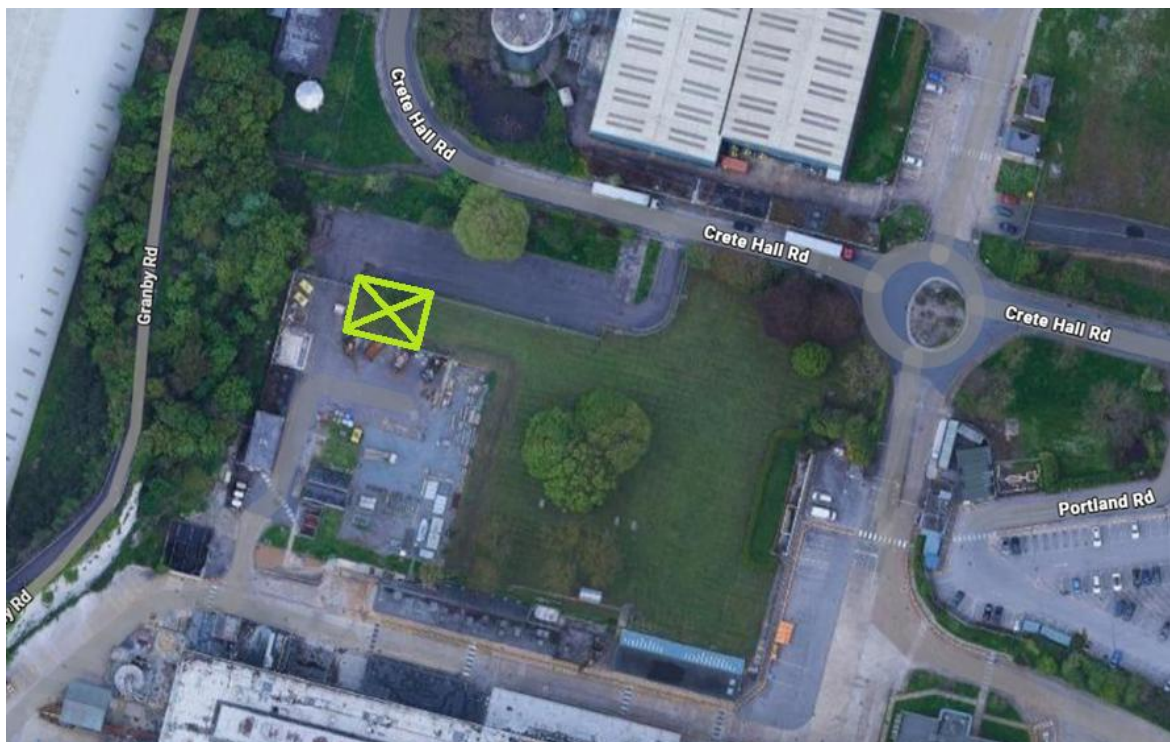


Figure 2.2 Aerial View of the Site (google maps). Green box marks approx. location of new boiler house.

The Surrounding Area

- 2.5 The nearest residential receptors are located around the High Street in the centre of Northfleet to the south / south-west of the site. Due to the nature of the local topography the existing Kimberly-Clark Paper Mill site sits at a lower level than these buildings.
- 2.6 The site is approximately 280 metres from the River Thames and is located within floodzone 2. The site is not located within an Air Quality Management Area or a Site of Special Scientific Interest. The site is not within a Conservation Area and there are no designated heritage assets within influencing distance of the site.
- 2.7 The HYRO electrolyser (approved under 20250251) is located in the Kimberly-Clark north site on the northern side of Crete Hall Road adjacent to the River Thames (not within the red line boundary of this application). Application 20250251 approves the piped supply of hydrogen to the proposed application site.

Planning History

- 2.8 The planning history relevant to the site is outlined below.

Reference	Description	Decision Date	+
20260264	Application to determine if prior approval is required for proposed demolition of buildings; Former Technical Lab Offices.	No decision made by LPA.*	
20250406	Development of a pulp laydown area and associated infrastructure.	Grant. 01.10.25	
20250251	Construction and operation of a Green Hydrogen Electrolyser and associated infrastructure.	Grant. 25.09.25	
20230906	Construction and operation of a 20MW Green Hydrogen Electrolyser and associated infrastructure.	Grant. 09.08.24	

Reference	Description	Decision Date	+
20230909	Request for Screening Opinion in relation to land at Kimberly-Clark Northfleet Mill – construction of a Green Hydrogen Electrolyser and associated infrastructure.	EIA required. 04.04.24	not
20230586	Installation of Solar PV System on roof of Kimberly-Clark warehouse, Northfleet.	Grant. 20.11.23	

Table 2.1: Planning History

**Application 20260264 expired on 06.04.2026. As per condition B.2 (vii) of Part 11 of the Town and Country Planning (General Permitted Development) (England) Order 2015, where a LPA has not made a determination within the 28 day period, the development can then commence provided demolition is undertaken in accordance with the submitted details.*

3. The Proposed Development

Development Context

- 3.1 Kimberly-Clark's Northfleet Mill complex currently has one Tissue Machine (TM3) that is the largest consumer of steam on the Northfleet site. The manufacture of tissue requires a large steam filled cast iron cylinder (Yankee) to be rotated at high speed to dry the tissue.
- 3.2 The existing boiler house is located adjacent to the River Thames in the north of the Mill site. The steam produced at the existing Boiler House is primarily used to heat the cylinder in the TM3 building. The location of the two buildings is identified in figure 1 below.

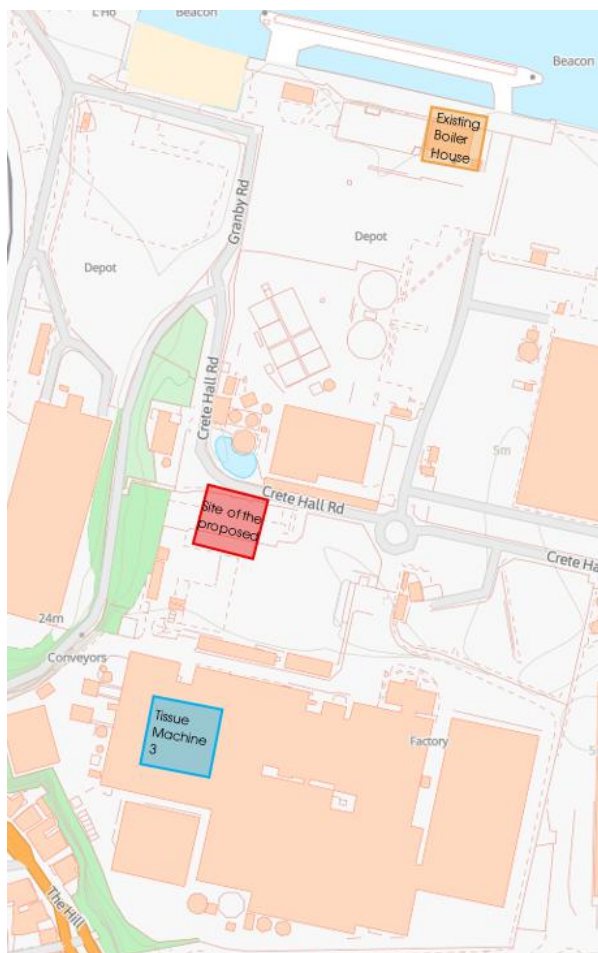


Figure 3.1: Location of existing boiler house, development site and TM3 building.

- 3.3 Originally designed for 3 (No.) tissue machines, there are 4 (No.) main boilers in the existing boiler house. Current operational needs mean that the site can run on 1 boiler with a second on 'hot standby', pressurised ready to run if another boiler fails. The other two boilers are switched off or undergoing maintenance.
- 3.4 These boilers still have many elements associated with past operational design and operate at around 83% efficiency. In addition to this, there are transportation and system losses due to the length (about 600 m) and age of the steam and condensate main pipework from the existing boiler house to the TM3 building (up to 10% additional losses).
- 3.5 As part of the energy transformation works at the site, it is therefore necessary to build a new boiler house in a new location on an area of unused land closer to TM3 on the south of the site to minimise pipe runs, improve efficiency and maximise green energy opportunities.

Hyro Site

- 3.6 The HYRO application approved under application reference 20250251 provides consent for the construction and operation of a Green Hydrogen Electrolyser and associated infrastructure on a separate site to the north (within the Kimberly-Clark north site).

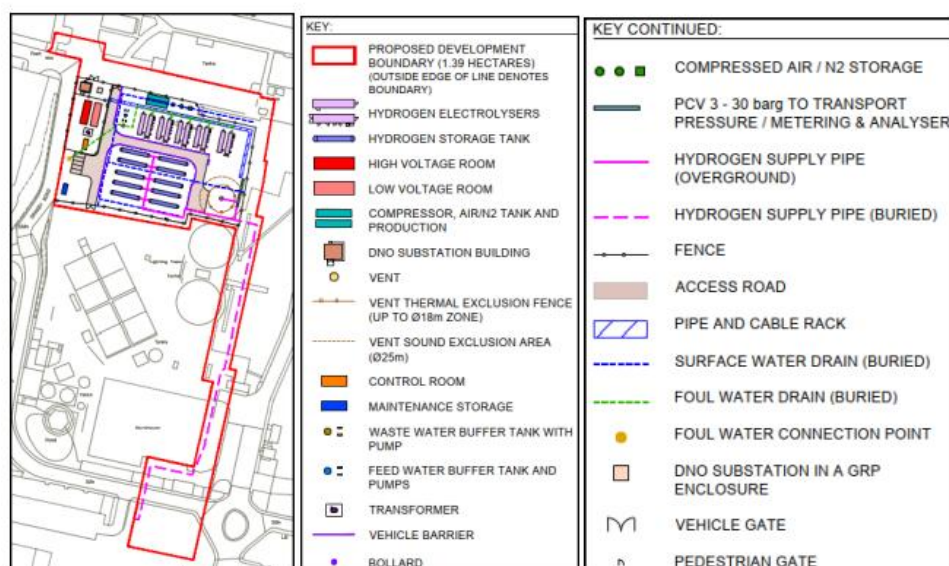


Figure 3.2: Development layout approved under 20250251.

Green Hydrogen

- 3.7 Green hydrogen is obtained by separating hydrogen from oxygen through the electrolysis of water. This electrolysis can be carried out with energy from renewable sources, which makes the process more sustainable and provides a clean energy source. The hydrogen obtained in this way can be stored or used in industrial processes, while the resulting oxygen is released into the atmosphere or can be used as a by-product. It is therefore a pollutant-free process.
- 3.8 Hydrogen for the new boilers will be supplied by the new approved facility to the north. The hydrogen connection will be delivered across the wider site by new pipework approved under 20250251. The approved pipework terminates at the edge of the pre-application site where Hydrogen pressure reduction skid is proposed within the pre-application site.

The Proposed Development

- 3.9 The proposed description of development is as follows: *Construction of a new boiler house with associated infrastructure / pipework and related works.*
- 3.10 The location for the new boiler house is at the south site of the mill complex on an area of land to the south of Crete Hall Road as identified on the proposed site plan (ref 3001954-AME-NF-ZZ-DR-PL-6053 P2).
- 3.11 The new boiler house will contain two no. hydrogen boilers, the intention being to replace fossil fuel natural gas used for steam generation in the manufacture of toilet and facial tissues.
- 3.12 The boiler selection includes the provision of 2 new boilers with full 100% hydrogen firing capability. The boilers will have dual fuel capability to allow use of either hydrogen or natural gas as a fuel. The proposal is for hydrogen to be the main fuel source, with capability to run natural gas as a back-up, when green electricity is not available.

- 3.13 Heavy industry is one of the most difficult sectors to decarbonise, but green hydrogen offers a way to do it. Heavy industries typically require high amounts of energy, and many processes can emit large quantities of CO₂. Green hydrogen can replace coal and natural gas in these processes, providing the energy requirements needed for industrial processes without the CO₂ emissions.
- 3.14 The boiler house will be 25 x 15 metres with a floor area of approximately 440m² over two levels. The lower level being the ground level which will house the new boilers and the upper level being a control room. The boiler house will include 2 no. chimney stacks at a total height of 20 metres above ground terminating from the roof. An Air Quality Impact Assessment is submitted with the application.
- 3.15 In terms of odour, the on-site processes will not result in odorous activity. The back up natural gas supply does have an odour but it will only be detectable in the event of a leak – for safety reasons odourant is deliberately added to natural gas so it can be detected. Hydrogen is inherently odourless and no odorant is normally added. Neither the natural gas supply nor the hydrogen will contain sulphurous compounds in quantities likely to cause an odour as a result of the products of combustion. Detectable odour inside or outside the boiler house as a result of the operation of the boilers is therefore highly unlikely.
- 3.16 Other works proposed as part of the application include:
- Installation of a Hydrogen pressure reducing station local to the new boiler house.
 - A gas booster system in the natural gas supply line (this is required as it is anticipated that pressure of the gas supply to the site is going to be reduced in the near future when the Pressure Regulating and Metering Station is replaced).
 - New pipework to connect to TM3 building.

- Provision of trenched electricity/ water / hydrogen and natural gas supply to the new boiler house.

3.17 The existing boilers will remain in operation until the final phases of the project and beyond to allow a transition to the new facility during a testing and proving period. Following operational validation of the new plant they will be decommissioned and the boiler house stripped of existing plant and repurposed as either a new spare building for future use by Kimberly-Clark or if necessary demolished. Should demolition be necessary, Kimberly-Clark are aware that this should form part of a separate planning consent.

Pre-Application Consultation

3.18 A Pre-Application Enquiry to the Local Planning Authority was submitted on the 10 November 2025. The planning officer met with the applicant and their representatives at the site on the 05 February 2026. A written response was issued on the 16 February 2026 and subsequently the application requirements were confirmed with the planning officer via email correspondence dated 16 February 2026.

3.19 The pre-application response expressed support for the principle of the proposals subject to appropriate supporting information being submitted with the application.

Environmental Impact Assessment

3.20 If a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations but do not exceed the thresholds, or meet the criteria in the second column of the Schedule, or are not at least partly in a sensitive area, are not schedule 2 development and the proposed development does not need to be screened by the local planning authority.

3.21 During pre-application, the applicant shared with the LPA an initial Screening Review which demonstrated that the development is not Schedule 1 development and is not Schedule 2

development by virtue of not exceeding the thresholds in Schedule 2 Column 2. The applicant has therefore concluded that EIA screening is not necessary.

- 3.22 Under Regulation 8 of the EIA Regulations where a planning application has been made without an environmental statement and the planning authority has no record of having previously adopted a screening opinion for the proposal, the planning authority can adopt an EIA screening opinion if they consider it to be necessary.

Environmental Permit

- 3.23 An Environmental Permit variation application to the Environment Agency will be submitted following submission of this planning application.

Hazardous Substances Consent

- 3.24 Hazardous Substances Consent is required for the presence of hazardous substances on, over or under land. It controls the storage and use of hazardous substances which when used in quantities above a specified limit present a major off site risk. The consent provides control over the presence of hazardous substances whether or not an associated planning permission is required.
- 3.25 For hydrogen the controlled quantity listed in Schedule 1 of the 2015 Regulations is 2 tonnes. For natural gas it is 15 tonnes.
- 3.26 The categories of substance which require consent are listed in the regulations. If the amount is above the controlled quantity listed then consent is required, where there is more than one substance to be used then the addition rule applies. It is understood that there is no storage proposed as part of this development. Whilst hazardous substances will be present in the pipework the quantities proposed on site will not exceed the thresholds in the regulations and as such hazardous substances consent is not required.

4. Planning Policy Context

Introduction

- 4.1 Section 38(6) of the Town and Country Planning Act 2004 states that applications for development should be determined in accordance with the adopted development plan unless material considerations indicate otherwise. In the case of Gravesham Borough Council (GBC) the adopted development plan consists of the Core Strategy (adopted 2014) and the saved policies of the Gravesham Local Plan First Review. Due consideration in the determination of the application will also need to be afforded to national policies in the National Planning Policy Framework (NPPF) which represents a significant material consideration.

Gravesham Borough Council Core Strategy (2014)

- 4.2 The policies of relevance to the proposed development are summarised below.
- 4.3 Policy CS01 Sustainable Development. The policy seeks to reflect the ‘presumption in favour of sustainable development’ in national policy whereby planning applications that accord with the policies in the development plan for Gravesham will be approved without delay, unless material considerations indicate otherwise.
- 4.4 Policy CS02 Scale and Distribution of Development. The policy sets out that development will be distributed throughout the borough with new employment floorspace focused in the opportunity areas at Northfleet Embankment and Swanscombe Peninsula East.
- 4.5 The policy promotes regeneration by prioritising the redevelopment and recycling of underused, derelict and previously developed land in the urban area. This will be principally through redevelopment of former industrial sites in the Opportunity Areas of Northfleet

Embankment and Swanscombe Peninsula East, and Gravesend Riverside East and North East Gravesend to create new residential neighbourhoods and employment areas.

- 4.6 Policy CS03 Northfleet Embankment and Swanscombe Peninsula East Opportunity Area. The existing Kimberly-Clark site is identified in the boundary of the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area (sub area 1.7).
- 4.7 The policy states that the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration in Gravesham. Development will bring significant benefits to existing adjoining residential communities and the Borough as a whole through the delivery of new housing and jobs whilst achieving environmental improvement, especially in air quality, and a high standard of design. The policy recognises that the Kimberly-Clark Site is to be retained in employment use and that the council will support proposals which expand and support their operation.
- 4.8 The supporting policy text states at paragraph 4.4.1 that there are clear opportunities in this location to make more efficient use of the land, facilitate river-related activity, accommodate new development and secure environmental improvement as part of the wider regeneration of the area.
- 4.9 The supporting policy text at 4.4.17 describes the role of the Kimberly-Clark site within the sub area.

'4.4.17 Kimberly-Clark site (sub-area 1.7) comprises a flat area of land set at a low level adjoining the River Thames. It is separated from the Northfleet Cement Works Regeneration Area to the west by the chalk spine of Granby Road. The site is currently occupied by the Kimberly-Clark tissue mill and associated buildings. The deep water wharf is used for the import of raw materials used in tissue manufacture and the transshipment of other goods.'

'4.4.18 It is anticipated that this use will continue beyond the plan period and the Council will support its continued operation and expansion. The Council will also support the extension of a heavy rail connection with the Lafarge Tarmac site (in sub-area 1.5) to allow Kimberly-Clark and the Northfleet Embankment East Regeneration Area access to the North Kent and High Speed railway lines.'

- 4.10 Policy CS07 Economy, Employment and Skills. The policy supports industrial facilities in the Northfleet Embankment Opportunity Area. In considering development proposals the council will support the refurbishment and upgrading of existing industrial premises (5.1.33).
- 4.11 Policy CS10 Physical and Social Infrastructure. States that support will be given to proposals and activities that protect, retain or enhance existing physical and social infrastructure.
- 4.12 Policy CS12 Green Infrastructure. The policy generally sets out that there will be no net loss of biodiversity in the borough.
- 4.13 Policy CS18 Climate Change. In respect of flood risk, the policy states:

'With the exception of the previously developed sites along the Thames Riverside (see Policies CS03, CS04 and CS05) and those other regeneration sites which have already been evaluated in accordance with the sequential and exception tests at the application stage, development will be directed sequentially to those areas at least risk of flooding'.

- 4.14 The site is identified within policy CS03 and therefore has already been evaluated in terms of the sequential preference of site. Therefore, whilst in flood zone 2, there is not a requirement to submit a Sequential Test for the proposals.
- 4.15 The policy sets out that in areas at risk of flooding, the development must be accompanied by a Flood Risk Assessment and a Flood Risk Management Plan to demonstrate that they

are adequately safe and defined over their lifetime. A Flood Risk Assessment and Drainage Strategy will be required.

- 4.16 In terms of carbon reduction, the policy sets out the need to reduce the overall carbon footprint of the Borough. The policy seeks development in the key sites of the borough to consider the potential for and include proposals for low carbon and renewable energy generation. The policy also supports stand alone decentralised, renewable or low carbon energy development where it is compatible with national policies for Green Belt and where it accords with policies in the plan.
- 4.17 Policy CS19 Development and Design Principles. Policy CS19 requires new development to be visually attractive, fit for purpose and locally distinctive. Development should also avoid adverse environmental impacts from pollution, including noise, air, odour and light pollution, and land contamination.

National Planning Policy Framework

- 4.18 The National Planning Policy Framework (NPPF) was last updated in February 2025 and sets out that the government's objectives for achieving sustainable development. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. These sustainable objectives should be delivered through the preparation and implementation of plan and the application of the policies in the framework. The NPPF is split into 17 chapters, the chapters of relevance to this development are discussed below.

Chapter 2 – Achieving Sustainable Development

- 4.19 Paragraph 8 of the NPPF advises that: Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to

be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

4.20 Paragraph 11 introduces the presumption in favour of sustainable development, for decision taking this means:

- Approving development proposals that accord with an up to date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed;

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-design places and provided affordable homes, individually or in combination.

Chapter 4 - Decision Making

- 4.21 Paragraph 47 states that: planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Decisions on applications should be made as quickly as possible, and within statutory timescales unless a longer period has been agreed by the applicant in writing.

Chapter 6 – Building a Strong, Competitive Economy

- 4.22 Paragraph 85 sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 4.23 Paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience.

Chapter 12 – Achieving Well Designed Places

- 4.24 Paragraph 135 states that planning decision should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Chapter 14 – Meeting the challenge of climate change, flooding and coastal change

- 4.25 Paragraph 161 states: The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

4.26 Paragraph 168 states: When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:

a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;

b) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions;

4.27 In terms of planning and flood risk, paragraph 170 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Chapter 15 – Conserving and Enhancing the Natural Environment

4.28 Under paragraph 187, the NPPF seeks to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and Development should also remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.29 Paragraph 196 explains that decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

- 4.30 Paragraph 198 advises that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
- 4.31 Paragraph 199 considers air quality issues and advises that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- 4.32 A robust set of environmental reports in terms of land contamination, noise and air quality are submitted in support of the application.

Government Policy on Hydrogen

- 4.33 The importance of hydrogen to the UK's future energy system and industry is reflected in government policy. In November 2020, the UK government published its Ten Point Plan for a Green Industrial Revolution, which proposed a target of having 5GW of low carbon hydrogen production capacity by 2030 (and 1GW by 2025). Building on this, the Energy White Paper set out the UK's strategy for the energy transition over the next decade, which amplified the role that the government sees hydrogen playing in its energy mix. In August 2021, the future role of hydrogen was consolidated in the first ever UK hydrogen Strategy setting out a roadmap for how commitments are intended to be achieved. The Hydrogen Update to the Market 2025 reflects on recent progress with low carbon hydrogen now at the heart of the Government's missions to kick start economic growth and become a clean energy superpower.

5. Planning Appraisal

Introduction

- 5.1 It is a requirement of section 38(6) of the Town and Country Planning Act 2004 that where a development plan contains policies relevant to an application, the decision must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The statutory development plan therefore relating to the Application Site consists of the Gravesham Borough Council Core Strategy (adopted 2014) and any saved policies in the Gravesham Local Plan First Review (1994). Material considerations relating to the application site include the National Planning Policy Framework, Planning Practice Guidance and Supplementary Planning Documents prepared by Gravesham Borough Council.

The Principle of Development

Compliance with Gravesham Local Plan Core Strategy

- 5.3 Policy CS01 'Sustainable Development' aligns with the 'presumption in favour of sustainable development' as contained in the NPPF, whereby planning applications in accordance with the development plan should be approved without delay. As will be demonstrated, the development is capable of complying with the presumption in favour of sustainable development as the proposals, which are supported by a range of technical report, are in clear accordance with policies in an up-to-date development plan, meaning the application should be approved without delay.
- 5.4 The application proposals mark the next important step in Kimberly-Clark's transition towards the use of low carbon hydrogen energy in the manufacturing process.

- 5.5 The Gravesham Local Plan Core Strategy Policies Map identifies the site as falling within the urban boundary and forming part of an 'opportunity area'.
- 5.6 Policy CS02 'Scale and Distribution of Development' seeks new employment floorspace to be focussed on opportunity areas at Northfleet Embankment and Swanscombe Peninsula East and the policy promotes the redevelopment of previously developed land in the urban area. The development capitalises on the Kimberly-Clark site being located within an existing employment location and proposes a form of development that will bring about improvements in terms of green energy production by utilising under used land on the Kimberly-Clark landholding. The development therefore positively responds to Policy CS02.
- 5.7 Under Policy CS03 the existing Kimberly-Clark site is identified in the boundary of the Northfleet Embankment and Swanscombe Peninsula East opportunity area. The policy recognises that the Kimberly-Clark site is a key employment site and provides support for proposals that expand and support existing operations at the site. This policy context therefore expressly supports the principle of development at the site. Similarly Policy CS07 supports development which upgrades an existing industrial operation.
- 5.8 The local policy context in favour of the principle of development is further confirmed via Policy CS18 'Climate Change'. The policy states that the Council will seek to reduce the overall carbon footprint of the Borough. In particular, the Council will support stand-alone, decentralized renewable or low carbon energy development where it accords with policies in the Plan.

National Planning Policy Framework

- 5.9 Government policy at a national level places hydrogen at the heart of the government's ambition to become a clean energy superpower and policies within the NPPF are clear at paragraph 161 that the planning system should support renewable and low carbon energy associated infrastructure.

- 5.10 Paragraph 85 of the NPPF explains that planning decisions should help create the conditions in which businesses like Kimberly-Clark can invest, expand and adapt. Significant weight is to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development and challenges for the future. The proposed development will support economic growth and productivity and through harnessing green hydrogen energy will do so which directly seeks to confront the challenges posed by climate change.
- 5.11 Furthermore paragraph 87c supports the expansion or modernisation of other industries of local, regional or national importance to support economic growth and resilience, thereby further underlining support at a national level for the development proposed.
- 5.12 Similar to Core Strategy policy CS02, paragraph 125c of the NPPF states that planning decisions must give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. In the case of this application, the development is on previously development land and meets an identified need to decarbonise the energy production used in manufacturing processes at the site.
- 5.13 Furthermore Paragraph 161 of the NPPF sets out that the planning system should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimize vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy associated infrastructure.
- 5.14 At paragraph 167, the NPPG states that 'Local Planning authorities should also give significant weight to the need to support energy efficient and low carbon heating improvements to existing building, both domestic and non-domestic'.

- 5.15 Paragraph 168 goes onto set out when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

Summary in Respect of the Principle of Development

- 5.16 The principle of development is therefore considered to be locationally appropriate being in an urban area on previously developed land. The proposed use would be in conjunction with the approved hydrogen facility which would be used for the production of low-carbon hydrogen to support the existing industry on the site, bringing about significant benefits in terms of green energy and infrastructure improvements. Not only is this of benefit for environment and climate change, but it would help to create the conditions in which Kimberly-Clark can invest, expand, and adapt. The proposal would therefore clearly result in a positive impact in terms of the NPPF's social, economic and environmental goals, which lie at the core of the NPPF's definition of sustainable development.
- 5.17 As will be demonstrated in the remainder of this statement, the low carbon proposal accords with all other policies in the Local Plan and NPPF and the supporting application material demonstrates that no adverse impacts will arise as a result of the proposals.

Design and Visual Impact

- 5.18 The industrial nature of the development is reflected in its appearance and functional nature. The development will appear within the context of numerous surrounding industrial buildings of a larger scale and therefore the development is in keeping with the character and appearance of the immediate surrounding area.
- 5.19 The development includes two chimney stacks at 20 metres high, whilst these are sizeable structures, given the large scale context of adjacent development such as industrial buildings, vents and chimneys and the Andrex office tower which all sit within a lower

topographical setting than the non industrial development to the south it is not considered that any concerns in respect of visual impact are likely. The development is therefore considered acceptable in respect of Core Strategy Policy CS19 and Chapter 12 of the NPPF.

Heritage Assets

- 5.20 Whilst there are some heritage assets, including listed buildings and a conservation area, within a 250m radius of the site, they are considered to be far enough away that they are not within the setting of the site. This is because they are not only separated by a considerable distance but also by the topography of the area which includes vast chalk cliffs, created by the extraction of chalk in the preceding centuries. This means that the site of the proposal and the heritage assets are on different height levels. There are also multiple, large areas of mature trees which entirely block the view between the conservation area and the proposed site. Ultimately, this means that a heritage statement is not considered a necessary requirement in this case and the application proposals are acceptable with regard to Chapter 16 of the NPPF.

Environmental Impacts

Ecology

- 5.21 A Preliminary Ecological Appraisal (PEA) Report (prepared by RSK Biocensus) is submitted in support of the application. The PEA assesses the suitability of the site to support protected or otherwise notable plant and animal species. A Preliminary Roost Assessment (PRA) for bats was also undertaken for the Former Technical Lab Offices which is to be demolished, the PRA also supported the prior approval application which is approved by virtue of expiration of the 28 days. The PRA confirms that the building does not contain any suitable roosting habitats.

- 5.22 The PEA outlines precautionary measures in relation to vegetation removal for amphibians, reptiles, birds and badgers. The development is acceptable when assessed against Chapter 16 of the NPPF.

Trees

- 5.23 The removal of one Category C tree is required to facilitate the proposals. A Tree Survey Plan and Tree Protection Plan is submitted with the application to ensure that retained trees are adequately protected during the construction process.

Biodiversity Net Gain

- 5.24 In accordance with legislative requirements, a Biodiversity Net Gain Statutory Metric and Design Stage Report are submitted in support of the application. This details that the current proposed development will result in a net change of -0.63 area habitat biodiversity units. This equates to a -26.16% net loss in biodiversity. Given the urbanised nature of the Application Site, opportunities for providing higher distinctness habitats are limited and would be unrealistic for this location. To achieve a 10% gain, the Kimberly Clark intends to purchase biodiversity units from an offsite habitat bank. This will be confirmed as a condition of planning permission.

The Local Noise Environment

- 5.25 A Noise Impact Assessment (prepared by RSK) is submitted in support of the application. Existing noise condition at the site have been surveyed from locations representative of the nearest sensitive receptors. The assessment models the boiler house and stacks, PRMS and gas booster using established methods to predict the likely noise levels associated with the site post development.
- 5.26 The predicted noise levels indicate that the proposed boiler house plant is unlikely to be distinguishable from the existing residual acoustic environment in terms of overall level and

character, particularly given the existing industrial, commercial and transportation noise sources audible at the receptor locations. The report concludes that at the nearest noise sensitive receptors to the site, noise from the proposed boiler plant is unlikely to be distinguishable or detectable within the context of the acoustic environment and that this is an indication of a low impact. No mitigation is identified as being necessary in the report and it is considered that compliance with Core Strategy Policy CS19 and Chapter 15 of the NPPF is demonstrated.

Air Quality

- 5.27 An Air Quality Assessment (prepared by RSK) is submitted in support of the application. The report assesses the air quality impacts associated with the replacement of natural-gas fired boilers with two new hydrogen-fired boilers (and associated stacks) with reference to existing air quality in the area and relevant air quality legislation, policy and guidance.
- 5.28 The assessment has demonstrated negligible and no significant impacts from the proposed changes to the site operations at nearby human receptors, with nitrogen dioxide and carbon monoxide concentrations staying well below the applicable air quality objectives.
- 5.29 At ecological receptors, the modelling has demonstrated that all site-wide impacts following the proposed changes to the onsite boiler configuration will not exceed Natural England's relevant screening/insignificance thresholds.
- 5.30 Overall, the air quality effects of the proposed boiler replacement is judged to be not significant and the development is considered compliant with Core Strategy Policy CS19 and Chapter 15 of the NPPF.

Flood Risk and Drainage

- 5.31 A Flood Risk Assessment and Drainage Strategy has been prepared by RSK and is submitted in support of the planning application. The FRA details the flood risk affecting the site from

all sources of flooding. The site is currently located in flood zone 2, with a small area in flood zone 1. There are existing tidal flood defences adjacent to the River Thames which provide a 1 in 1000 year standard of protection to the surrounding area. In the event of a breach or failure of defences, a residual risk remains, although this only likely to occur under extreme or highly unlikely breach conditions. A risk appropriate package of mitigation measures is designed into the proposals to ensure that any residual risk can be managed and mitigated for.

- 5.32 In terms of surface water drainage as agreed with Kent County Council, runoff may discharge to the tidal River Thames via the existing public surface water sewer along Crete Hall Road. To align with Southern Water preferences, discharge will be controlled using a vortex flow control to a minimum practicable rate of 2.0l/s. Attenuation will be provided using a geocellular storage tank designed for the 1 in 30 year event plus 35% climate change and the 1 in 100 year event plus 40% climate change, with allowance for tidal surcharge when the outfall is submerged. Full details of the strategy are contained in the supporting report.
- 5.33 The proposals are considered to be compliant with policy contained in Chapter 14 of the NPPF.

Ground Conditions

- 5.34 A Geo-environmental Appraisal Report prepared by Dunelm is submitted in support of the application and details the site investigations undertaken to date. No sources of contamination have been encountered during this investigation and consequently no unacceptable risks have been identified. In terms of hazardous gases, no special gas precautions are required based on the monitoring results to date.

Traffic Impacts

- 5.35 Traffic associated with the construction phase will be related to site preparation, site construction, deliveries of materials, plant and equipment etc. The construction and commissioning phase is expected to last a duration of approximately 9 months.
- 5.36 It is anticipated that no more than 2-3 deliveries will take place per day, this will not be a continuous daily activity and rather will be phased depending on the stage of construction. Deliveries will take place at an appropriate time of day to minimise impacts on the surrounding highway network at peak times. There is sufficient space within the site for deliveries to take place and gain direct access to the application site / construction compound. No deliveries / unloading will take place from the public highway. All contractor parking will occur within the Kimberly-Clark site. A Construction Management Plan will be required at condition discharge to control traffic related activities.
- 5.37 Once in operation the new boiler plant will require periodic deliveries to be made for raw materials such as water treatment chemicals etc. As these deliveries will replace the existing deliveries of similar raw materials to the existing boiler plant, it is not anticipated that any material change will be experienced on the local highway network.

Waste Management

- 5.38 Any general wastes/maintenance wastes generated will be handled/disposed of in accordance with the existing site management procedures. Wastes will be handled by appropriately licensed waste disposal carriers and sent to appropriately licensed waste disposal sites in accordance with duty of care requirements.

Construction Management

- 5.39 Kimberly-Clark in conjunction with the principal contractor will ensure the construction process is managed as effectively as possible. A Construction Management Plan will be

prepared by the principal contractor following planning approval and this will include information with respect to the items listed below.

- Measures to prevent the mobilization of any identified contaminants during construction.
- Procedures for dealing with unexpected contamination discovered during construction.
- Plans for managing excavation and disposal of contaminated materials in compliance with relevant waste regulations.
- An indicative programme for carrying out the works.
- Measures to minimise the production of dust on the site(s).
- Measures to minimise the noise (including vibration) generated by the construction process to include the careful selection of plant and machinery and use of noise mitigation barrier(s).
- Maximum noise levels expected 1 metre from the affected façade of any residential unit adjacent to the site(s).
- Design and provision of site hoardings.
- Management of traffic visiting the site(s) including temporary parking or holding areas.
- Provision of off-road parking for all site operatives.
- Measures to prevent the transfer of mud and extraneous material onto the public highway.
- Measures to manage the production of waste and to maximise the re-use of materials.
- Measures to minimise the potential for pollution of groundwater and surface water.
- The location and design of site office(s) and storage compounds.
- The location of temporary vehicle access points to the site(s) during the construction works.
- The arrangements for public consultation and liaison during the construction works.

5.40 Kimberly-Clark Ltd will work with the Council through the post planning stages in order to formalise the management of the construction phase.

6. Summary and Conclusions

- 6.1 This Planning Statement has been prepared by Paul Butler Associates on behalf of Kimberly-Clark Ltd and supports an application for the construction of a new boiler house with associated infrastructure and pipework. The proposed development will utilise green hydrogen produced by the approved facility to the north. The two new boilers will have 100% hydrogen firing capability, the intention being to replace fossil fuel natural gas used for steam generation in the manufacture of toilet and facial tissues at the site.
- 6.2 The application site provides a suitable location for the new development, by linking into the approved PEM electrolyser facility to the north. The development will be situated on a previously developed area of land within the existing Kimberly-Clark employment location.
- 6.3 The development will support the existing industry on the site, bringing about significant gains in terms of green energy and infrastructure improvements. These improvements will provide clear benefits to the environment through climate change improvements and also create economic benefits through the ability for Kimberly-Clark to invest, expand, and adapt their existing operation. Social benefits will be realised through supporting the investment and growth of a major local employer, thereby allowing jobs to be protected. Employment will also be created during the construction phase of the development.
- 6.4 The proposal would therefore clearly result in a positive impact in terms of the NPPF's social, economic and environmental goals, which lie at the core of the NPPF's definition of sustainable development.
- 6.5 In applying the presumption in favour of sustainable development as expressed in paragraph 11 of the NPPF, for planning decisions this means approving development proposals that accord with an up-to-date development plan without delay.
- 6.6 The application development is considered to be in full compliance with the adopted policies of the Local Plan and also the NPPF. As evidenced in this statement, the Site has

been shown to be a suitable and sustainable location for the development and the supporting technical reports and evidence demonstrate that the development is capable of proceeding without any adverse impacts arising. It is therefore respectfully requested that the development is approved within the statutory determination to allow the implementation of this energy project to proceed within the defined project timescales.

- 6.7 We look forward to working with Gravesham Borough Council during the determination of this planning application.