



Delegated Report

Planning Application

Planning Application No: 20260415

Location: Kimberly Clark Ltd Northfleet Mill Crete Hall Road Northfleet

Description: Construction of a new boiler house with associated infrastructure / pipework and related works.

Applicant: Kimberly Clark

Site Visit Date: Previous Visits

Submitted Documents/Plans

Application Form

Cover Letter

3001954-AME-NF-ZZ-DR-CV-6021 Rev P1 – Landscaping Details

3001954-AME-NF-ZZ-DR-PL-6051 Rev P2 – Site Location Plan

3001954-AME-NF-ZZ-DR-PL-6052 Rev P2 – Site Plan as Existing

3001954-AME-NF-ZZ-DR-PL-6053 Rev P2 – Site Plan as Proposed

3001954-AME-NF-ZZ-DR-PL-6054 Rev P2 – Proposed Plans

3001954-AME-NF-ZZ-DR-PL-6055 Rev P2 – Elevations

3001954-AME-NF-ZZ-DR-PL-6066 Rev P1 – Elevations Showing Pipework

3001954-AME-NF-ZZ-DR-PL-6067 Rev P1 – Demolition Plan

3001954-AME-NF-ZZ-DR-PL-6068 Rev P1 – Pipe Supports

3001954-AME-NF-ZZ-DR-PL-6069 Rev P1 – Roadside Elevations

3001954-AME-NF-ZZ-DR-PL-6070 Rev P1 – Longitudinal Planning Section

3001954-AME-NF-ZZ-DR-PL-6071 Rev P1 – Natural Gas Booster

3001954-AME-NF-ZZ-DR-PL-6072 Rev P1 – Boiler Replacement PMRS Buildings

Tree Survey Plan

BNG Metric

Biodiversity Net Gain Design Stage Report

2062350-RSKA-RP-001-(01) – Noise Impact Assessment

Preliminary Ecological Appraisal Report

446561-01 (02) – REVISED Air Quality Assessment

682039-R1(1)-FRA - Flood Risk Assessment and Drainage Strategy

H31174 – Geoenvironmental Appraisal

817/1 F – Site Services Building

Tree Schedule

Pre-Commencement Tree Protection Plan

Existing Building to be demolished

Planning Statement

Superseded documents

~~Air Quality Assessment~~

Relevant Planning History

Reference	Description	Decision	Decision
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			Date
20260264	Application for determination as to whether prior approval is required for the demolition of the former technical lab / offices.	Prior Approval Not Required	01.05.2026
20250406	Development of a pulp laydown area and associated infrastructure.	Permitted	01.10.2025
20250251	Construction and operation of a Green Hydrogen Electrolyser and associated infrastructure.	Permitted	25.09.2025
20230906	Construction and operation of a 20MW Green Hydrogen Electrolyser and associated infrastructure.	Permitted	09.08.2024
20230909 (SoS Decision)	Request for Screening Opinion in Relation to land at Kimberly-Clark Northfleet Mill, Northfleet - Construction of a Green Hydrogen Electrolyser and associated infrastructure.	EIA Not Required	04.04.2024
20230586	Installation of Solar PV System on Roof of Kimberly Clark Warehouse, Northfleet.	Permitted	20.11.2023

Development Plan

Gravesham Local Plan Core Strategy (2014)

- CS01 – Sustainable Development
- CS02 – Scale & Distribution of Development
- CS03 – Northfleet Embankment and Swanscombe
- CS07 – Economy, Employment and Skills
- CS12 – Green Infrastructure
- CS18 – Climate Change
- CS19 – Development & Design Principles

Gravesham Local Plan: First Review (1994)

- P3 – Vehicle Parking Standards

Paragraph 34 of the NPPF (2024) sets out that policies within adopted local plans should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Such reviews are also a legal requirement as set out in Regulation 10A of the Town and Country Planning (Local Planning) England Regulations 2012.

The Council undertook such a review in September 2019 and found that the adopted Local Plan Core Strategy is in need of a partial review in terms of Policy CS02, due to the increased need for housing since the Local Plan Core Strategy was adopted and the need to ensure that a sufficient land supply exists to meet this need. Whilst saved policies from the Local Plan 1st Review (1994) generally conform with the NPPF (2024), the Council will also seek to replace these.

National Planning Policy Framework (2024)

- Section 2 – Achieving Sustainable Development
- Section 12 – Achieving Well-Designed Places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change

Supplementary Planning Guidance

- SPG 4 – KCC Parking Standards (2006)
- Design for Gravesham – Design Code (2024)

Emerging Local Plan as a Material Consideration

Paragraph 48 of the Framework makes it clear that planning applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise. An emerging

Local Plan, does not form part of the Development. The Framework, at Paragraph 49 allows local planning authorities to give weight to relevant policies in emerging Local Plans, according to:

- The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- The degree of consistency of the relevant policies in the emerging plan to the Framework, the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given to those policies.

West Oxfordshire District Council v Secretary of State for Housing, Communities and Local Government & Rosconn Strategic Land Ltd [2018] EWHC 3065 (Admin) is a High Court judgement that deals with the weight to be given to a Regulation 19 Local Plan. In this judgement the Court found that the weight to be given to an emerging Local Plan, was a matter of planning judgement, which had to be reached having fully considered the relevant part (Paragraph 49) of the Framework.

The Council's emerging Local Plan, is in the process of being consulted upon (it has reached Regulation 19 stage), the Council is not yet aware of whether third parties will support or object to specific policies within the Plan, or whether they will consider the policies with the emerging Local Plan to be broadly sound and consistent with the NPPF (2024). Taking this into consideration, one can only conclude that at this stage of the process, limited (i.e. minimal) weight should be afforded to the emerging Regulation 19 Local Plan. This position would only change once the emerging Local Plan has progressed towards submission and examination, with the Council being fully aware of policies that are subject to unresolved objections and with knowledge of policies that have had their soundness and conformity against the Framework challenged.

This approach accords with the approach taken in a separate High Court case, Gladman Developments Ltd v SSHCLG & Corby Borough Council; & Uttlesford DC [2020] EWHC 518 (Admin) and Court of Appeal [2021] EWCA Civ 104, which was also the subject of a Court of Appeal Ruling [2021] EWCA Civ 104.

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Environmental Protection Officer

It's understood that this is an application for the replacement of the existing gas fire boilers with new dual fuel boilers (primarily hydrogen) and new associated stacks being due fuel. The following comments are made:

Air Quality

The submitted air quality report compares the emissions from the existing boiler flues with predicted emissions from the new boilers/flues. The detailed modelling predicts that the change in emission levels are very minor and will result in no detrimental impact/change to local air quality levels.

There is therefore no objection on air quality grounds.

Contaminated Land

The submitted Geoenvironmental Appraisal which includes a Phase 1 Preliminary Risk Assessment and Phase 2 intrusive investigation, has been reviewed. The intrusive investigation did not indicate any significant contamination with all results being below the GAC for commercial end use. Gas monitoring did not indicate any methane and only low carbon dioxide levels were found. No gas protection measures are needed. Whilst no further investigation or remediation measures are need, it is advised that the following

watching brief condition is attached to any permission.

Watching Brief

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 LPA as to the appropriate measures to be taken to resolve the matter and they are satisfied that those measures have been carried out.

The EA should also be consulted with regards to any impact on controlled waters as the site is over a Principal Aquifer.

Noise

The submitted noise impact assessment has been reviewed. The report follows appropriate methodology and includes a BS4142 assessment. The rating level of the proposed plant will be 4-7dB below the existing background noise level which is already dominated by industrial and traffic noise. Based on this, the noise levels are acceptable and there is no objection to the proposal on noise grounds. The plant/equipment should be installed in accordance with the submitted details and specification.

As advised in the pre-application advice, it is likely that an Environmental Permit will be required from the EA for this proposal. This is likely to stipulate emission criteria and will also consider the stack height in terms of dispersion.

Code of Practice on Construction and Demolition

A condition requiring a Demolition/Construction Environmental Management Plan is advised.

KCC Fire Safety Officer

Thank you for your email dated 29 April 2026. Following my assessment of Fire and Rescue Service emergency access provisions for application number 20260415 I would like to make the following observations.

Upon review of the documents available on the planning portal, it is in my opinion that emergency access under the above act appears to have been met at this stage.

Please be aware that should this proposal be successful it would then be subject to a Building Regulations consultation where the access arrangements would again be examined under section B5.

Fire Service access and facility provisions are a requirement under B5 of the Building Regulations 2010 and must be complied with to the satisfaction of the Building Control Authority. A full plans submission should be made to the relevant building control body who have a statutory obligation to consult with the Fire and Rescue Service.

If you require any further advice, please contact this office using the details above. Please be aware that the Building Safety office hours are 09:00-17:00 Monday to Friday.

KCC Flood and Water Management

As Lead Local Flood Authority, Kent County Council are required to provide technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangement put forward by developers to any new major development.

According to the Town and Country Planning (Development Management Procedure) (England) Order 2010, major development is defined in planning as any development involving any one or more of the following:

- a) The winning and working of minerals or the use of land for mineral-working deposits;
- b) Waste development;
- c) The provision of dwelling houses where:

- i. The number of dwelling houses to be provided is ten or more; or
- ii. The development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c) (i);
- d) The provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or
- e) Development carried out on a site having an area of one hectare or more.

The application under the above reference number therefore falls outside the definition of major development and also falls outside of KCC's remit as statutory consultee.

Notwithstanding the above, please feel free to contact us again if you consider there to be local flood risk issues on this site that may require further consideration.

KCC Biodiversity

SUMMARY –

We have reviewed the information submitted by the applicant and advise that sufficient ecological and biodiversity net gain information has been provided for determination. Recommended condition/informative wording is provided below.

A summary of our review of the submitted biodiversity net gain information is provided below. Detailed comments on the submitted ecological and biodiversity net gain information follow the subheadings below.

Table 1: To show a summary of our review of submitted biodiversity net gain information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 - significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	-26.16%	NA	2 – no significant on-site and off-site	No

Using the national and local guidance regarding significance, we consider that the on-site biodiversity net gain (excluding private gardens) should not be treated as on site significant.

BATS

Bats are fully protected through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Some species of bat (e.g., Bechstein's, noctule, soprano pipistrelle, brown long-eared) are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as Species of Principal Importance (aka. Priority Species) for conservation. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including the local planning authorities, to conserve and enhance biodiversity. Government standing advice indicates that local planning authorities must have regard for the conservation of Section 41 species and all bat species as part of their planning decisions¹⁸.

The Preliminary Ecological Assessment (PEA) highlights that the surrounding area has high bat activity, with there being previous need for an European Protected Species License (EPSL) within a 2km radius, with the nearest site being 580m West of the site. The Preliminary Roosting Assessment of the building was deemed 'negligible' for bats due to sealed external points with a cement roof, as well as some exposed features that do not lead deeper into the building being South-East or West facing, which would not be ideal for bats.

Whilst we argue that considerations should usually be considered for these features, we believe that based on the industrialised area and high disturbance, as well as the lack of surrounding suitable habitat, it is unlikely that bats would be using the building as a roost. As such we are satisfied that no further surveys

are required and sufficient information has been provided. We condition that a Precautionary Working Methods Statement (PWMS) and an artificial lighting strategy be provided to account for foraging and commuting bat species within the area.

GREAT CRESTED NEWTS

Great crested newts (GCN) are fully protected through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).

Great crested newts are also listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 as a Species of Principal Importance for conservation.

Local planning authorities must have regard for the conservation of Section 41 species as part of their planning decisions⁷⁰.

The submitted ecological report has outlined that the proposed development has the potential to have detrimental effects on great crested newts (GCN).

The application site lies within 250 metres of at least 1 ponds/waterbodies and is within a Green Risk Zone within the GCN Risk Zones for Kent⁷¹. Green zones contain sparsely distributed GCN and are less likely to contain important pathways of connecting habitat for this species.

The PEA highlights the pond due to it being 25m from the application site, however due to a lack of suitable terrestrial habitat of grassland, varied hibernacula, and shrub areas, it is extremely unlikely that GCN would be found, with which we agree.

We are satisfied with the information provided and suggest a Precautionary Working Methods Statement (PWMS) be conditioned to consider the species.

PRECAUTIONARY WORKS METHOD STATEMENT

We understand that the site is a low-risk area due to the high urbanisation and disturbance in the application site. Therefore, to protect from limited adverse impacts to protected species during clearance and construction we recommend a precautionary works method statement is a condition with the suggested wording below.

Suggested Condition Wording:

From commencement of works (including site/vegetation clearance), and for the duration of construction, all mitigation for bats, breeding birds, and great crested newts shall be carried out in accordance with the details contained in sections 5, table 9 of the PEA.

ARTIFICIAL LIGHTING

Lighting in the vicinity of a bat roost or along commuting / foraging routes could constitute an offence both to a population and to individuals. Artificial lighting has been shown to be particularly harmful to bats along river corridors, near woodland edges and near hedgerows¹¹. Local authorities have a duty to ensure impacts upon legally protected species are avoided and impacts upon bats are a material consideration in any planning permission under the Natural Environment and Rural Communities (NERC) Act 2006 and through the NPPF 2024.

Therefore, to mitigate against potential adverse effects on biodiversity, the Bat Conservation Trust/Institute of Lighting Professional's 'Guidance Note 8 Bats and Artificial Lighting at Night' (or subsequent updates) should be consulted in the lighting design of the development.

We advise that the incorporation of sensitive lighting design for biodiversity is submitted to the local planning authority and secured via an attached condition with any planning permission.

LIGHTING PLAN REQUIRED

Suggested Condition Wording:

Prior to occupation, a lighting design plan for biodiversity shall be submitted to, and approved in writing by, the local planning authority. The plan shall show the type and locations of external lighting, as well as the

expected light spill in lux levels, to demonstrate that areas to be lit shall not adversely impact biodiversity. All external lighting shall be installed in accordance with the specifications and locations set out in the approved plan and shall be maintained thereafter.

Reason: To limit the impact of light pollution from artificial light in accordance with the NPPF 2024, paragraph 198(c). With consideration for bats and other nocturnal wildlife in accordance with the NPPF 2024, paragraph 187(d).

BIODIVERSITY NET GAIN

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications¹⁰⁷ for development (unless exempt^{108,109}) must deliver at least a 10% biodiversity net gain (BNG), shown via use of the Statutory Biodiversity Metric prior to commencement of any development.

Significant on-site gains, and all off-site gains will need to be secured for at least 30 years.

Having reviewed submitted information¹¹⁰, we consider a 10% biodiversity net gain is a statutory requirement of this proposed development.

We have produced the following table to aid the local planning authority in ascertaining whether sufficient BNG information has been submitted:

Table 2: To show whether the applicant has met the minimum valid requirements, expected information standards in line with planning practice guidance any applicable national or local policies.

Information Needed	Provided	Comments
Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition.	Yes	
The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate).	Yes	A site visit was carried out by a suitably qualified ecologist on 09/04/26. This is considered acceptable to inform the habitat baseline for this application given the site size, location and habitats reported.
Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date.	Yes	Previous date of 04/02/26 used, due to 0.1 habitat units lost for removal of scrub area, which is accounted for within the metric as a loss of habitat units.
The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value.		The site is 0.41 hectares in size, according to the information in the application form. The habitat area reported in the biodiversity metric calculation tool matches the reported red line boundary site area as per the application form. Baseline Habitats We are content with the baseline habitat classifications. We highlight to Gravesham Council that the Kent and Medway Local Nature Recovery Strategy (LNRS) was published 28th November 2025. The LNRS changes how strategic significance is considered and any BNG assessments produced after the LNRS was published

		can no longer use <i>Location ecologically desirable but not in local strategy</i>. All baseline information must be set to <i>Area/compensation not in local strategy/ no local strategy</i> The baseline information has correctly reflected the published LNRS requirements.
A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have: - a statement to the effect that these activities have been carried out; - the date immediately before these activities were carried out; - the pre-development biodiversity value of the onsite habitat on this date; - the completed metric calculation tool showing the calculations, and - any available supporting evidence of this.	Yes	Reported loss of 0.1 ha of scrub within application form and PEA, dated 09/04/26. This has been accounted for within the metric
A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date).	N/A	None reported.
Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	Yes	

Post-development Habitats

Habitat Creation and Enhancement Tabs

We consider that the proposed habitat creation/enhancement and proposed uplift of 10% BNG is not achievable and realistic on site. As such, off-site biodiversity net gain will be required – further details on offsite BNG can be found at the end of the report.

We advise that it is our view that the proposal does not meet the requirements of onsite significant and does not need to be secured for 30 years. However, we advise that the proposed habitat will have to be managed, and we have recommended a LEMP Condition.

Information has been submitted with this application to give confidence that the biodiversity gain hierarchy can be effectively applied to this application, and how conditions should be applied should planning consent be granted. Details of the BNG hierarchy can be found at the end of the report.

Deemed Condition

The development, if permitted, will be subject to the deemed condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

The condition cannot be varied or removed. An application must be made to discharge it as any other condition. If planning permission is granted, the statutory biodiversity gain condition (and its reason for imposition) should not be included on decision notices as a condition. We recommend it is included in decision notices in the form of an informative.

Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 sets out the biodiversity net gain information which needs to be included on non-exempted decision notices. The Planning Practice Guidance (Paragraph: 026 Reference ID: 74-026-20240214)¹ provides a link to a document with suggested paragraphs for Biodiversity Gain Information to fulfil these requirements.

Biodiversity Gain Plan – suggested condition

The following condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application.

The Biodiversity Gain Plan shall be prepared in accordance with the baseline information within table 9 of the PEA for Kimberly Clarke Ltd site, dated 07/04/26 and prepared by RSK Biocensus.

BIODIVERSITY GAIN PLAN

Single Phase Development

Suggested Condition Wording:

The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Report information for Kimberly Clarke Ltd, dated 09/04/26 and prepared by RSK Biocensus.

Reason: To ensure the proposals are in accordance with details submitted and considered as part of the planning application.

The above condition is not a statutory requirement but unless imposed there would be no requirement that the Biodiversity Gain Plan submitted for approval to be in accordance with any biodiversity or ecological information submitted with the planning application. This condition may not be appropriate for some outline planning permissions where the post-development biodiversity value will not be known until reserved matters have been approved.

LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)

Suggested Condition Wording:

Prior to any landscaping works commencing on site a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the local planning authority. The plan shall accord with the measures outlined in the X associated with the planning application and shall include details of the following:

- a. Habitat creation measures, including full details of tree, shrub and hedgerow planting, modified grassland creation and aquatic planting around SuDS features;
- b. A full planting schedule utilising primarily native species;
- c. Full elevations plans detailing the model and location of integral swift boxes in accordance with BS 42021:2022 (north/east facing, 4m from the ground and with unobstructed access);
- d. Details of externally-mounted bat and bird boxes which are to be of durable construction and suitably located;
- e. Locations of 13×13cm holes in closeboard fencing provided for hedgehogs
- f. Rolling, long-term maintenance measures covering up to a 30-year period; and
- g. Details of responsible persons.

The approved plan shall be implemented as described and retained thereafter.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006.

EVIDENCE OF IMPLEMENTATION - LEMP

Suggested Condition Wording:

Within twelve months of first use of the development hereby approved, photographic evidence of the implementation of such habitat creation and biodiversity enhancement measures as are required by condition of the LEMP condition shall be submitted to the local planning authority for approval. The approved measures shall be thereafter retained.

Reason: To protect and enhance biodiversity in accordance with paragraphs 187 and 193 of the National Planning Policy Framework (December 2024), and in order for the Council to comply with Part 3 of the Natural Environment and Rural Communities Act 2006

ENHANCEMENTS UNRELATED TO BNG (NON-BNG)

Other biodiversity enhancement measures, which are unrelated to BNG, are detailed in the submitted in Section 4.6 within the PEA and include the following:

- Provisions of a sensitive lighting plan
- Provisions of bird and bat boxes to increase nesting/roosting opportunities
- Provisions of log piles and generation of hibernacula for reptiles and amphibians

We support the inclusion of these enhancements into the proposed development as they accord with paragraph 187(d) of the NPPF 2024, which states: "Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs." The implementation and retention of these enhancements should be secured via planning condition and evidenced via the LEMP.

BIODIVERSITY GAIN HIERARCHY

The applicant is required by law to deliver biodiversity gains in accordance with the biodiversity gain hierarchy, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 Section 37A. The hierarchy is summarised as:

- Avoid: Avoiding adverse effects of the development on on-site habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than four (i.e. medium or higher);
- Mitigate: So far as those adverse effects cannot be avoided, mitigating those effects;
- On-site habitat enhancements: So far as those adverse effects cannot be mitigated, habitat enhancement of on-site habitat;
- On-site habitat creation: So far as there cannot be that enhancement, creation of on-site habitat;
- Off-site: So far as there cannot be that creation, the availability of registered offsite biodiversity gain;
- Statutory credits: so far as that off-site habitat enhancement cannot be secured, purchasing biodiversity credits.

OFF-SITE GAINS

Off-site biodiversity gains

'Off-site' biodiversity gains are any BNG measures proposed outside of the red line boundary. It can be achieved through habitat creation on land owned by the applicant/developer, a third-party provider or through the purchase of BNG units from a habitat bank operator for a site which is registered on the Biodiversity Gain Site Register.

The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any off-site units if these are used. BNG sites must be registered here: Register a biodiversity gain site - GOV.UK.

If off-site habitat creation is required, we direct the applicant towards the Kent Biodiversity Net Gain Site Register¹²⁵ available on the Making Space for Nature in Kent and Medway website. Biodiversity Net Gain Guidance for Kent is also available on this website.

If any off-site habitat creation/enhancement is proposed outside of the LPA boundary/National Character

Area of the impact site these will be subject to spatial risk penalties.

Where off-site gains are secured on land owned by the developer (but outside the redline boundary), or on third-party land (but not through a 'habitat bank operator'¹²⁶), the biodiversity net gain needs to be subject to a deed of conservation covenants or Section 106 (as appropriate). Section 106 agreement templates are available on the Planning Advisory Service website. It is generally inappropriate to rely solely on conditions to secure off-site biodiversity net gain. The following needs to be secured as part of the off-site biodiversity net gain:

- The submission of a habitat management and monitoring plan (HMMP);
- Notice of HMMP implementation and completion of the habitat creation and enhancement works;
- Timescales for completion of habitat creation, and the submission of a completion report;
- Submission of monitoring reports;
- A habitat monitoring fee to be paid to the local planning authority on every habitat management monitoring event.

The HMMP shall be submitted when the general BNG condition is discharged and shall contain the following information ¹²⁷:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Where off-site gains are to be secured through a 'habitat bank operator' (which has its own legal agreement and HMMP), no additional conditions or section 106 obligations are required, but the deemed condition still applies.

How the BNG is to be achieved will have to be agreed, secured and, where applicable, registered on the Biodiversity Gain Site Register, prior to the submission of the pre-commencement Biodiversity Gain Plan.

Statutory Credits

If it can be demonstrated that onsite biodiversity gains are not possible, the developer will need to demonstrate that they have approached 3 local or national suppliers, habitat banks or trading websites before considering statutory credits. The only exception¹²⁸ to this is where a developer has a unit deficit smaller than 0.25 biodiversity units (area or linear), in which case they do not need to approach 3 suppliers before considering statutory biodiversity credits. Statutory credits are intentionally marked up in price to prevent undercutting the off-site market; these prices are reviewed every 6 months. Prices are available here: Statutory biodiversity credit prices - GOV.UK.

It is not usually necessary to secure the biodiversity net gain through additional conditions (other than the deemed condition) or a section 106 agreement.

REGISTERING OFFSITE BNG

If land has been purchased for the purposes of creating and selling offsite units (i.e. a habitat bank) but the Land Registry does not reflect the change of ownership, Natural England have confirmed that the following evidence of ownership is acceptable:

- The current Land Registry entry and title plan, no more than two months old;
- A certified signed transfer document; and

- Evidence that an application to register the transfer has been made to the Land Registry.

KCC Highways

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters:

The supporting documentation indicates that there will no significant increase in traffic movements on the public highway, as a result of these proposals. It is also appreciated that there will be no significant increase in vehicle movements associated with the day to day operation of the site.

The greatest impact on the highway will be experienced during the construction phase and this could be controlled adequately with a Construction Management Plan to ensure the impact is minimal.

Consequently, I can confirm that provided the following requirements are secured by condition or planning obligation, then I would raise no objection on behalf of the local highway authority:

- Submission of a Construction Management Plan before the commencement of any development on site to include the following:

- (a) Routing of construction and delivery vehicles to / from site
- (b) Parking and turning areas for construction and delivery vehicles and site personnel
- (c) Timing of deliveries
- (d) Provision of wheel washing facilities
- (e) Temporary traffic management / signage

Health and Safety Executive

No comments received.

Port of London Authority

Thank you for consulting the Port of London Authority (PLA) on the application in relation to the construction of a new boiler house with associated infrastructure / pipework and related works.

We note that the majority of the application site is located within Flood Zone 2 therefore Impacts of the proposed construction on ground water and surface water flooding must be considered to ensure there are no negative impacts on the river. We support the condition and informatives requested by the Environment Agency We note in the Flood Risk Assessment (FRA) that the site will discharge to the River Thames via the existing drainage system (paragraph 7.3.1). Any potential new or amended use of the river for extraction or outfall will require a River Works Licence with the PLA and the PLA's Statutory Consents and Compliance team must be contacted at lic.app@pla.co.uk to discuss further.

The proposal must consider Policy CS11 Transport of the Local Plan and the emerging Local Plan Policy LP19 Sustainable Transport and Decarbonisation, in the context of supporting the continued use of the River Thames for commercial transport, whilst safeguarding and maximising the use of the existing commercial wharves. There is no Construction and Logistics Plan for the application. Water transport is recognised as one of the most sustainable modes for freight movement and therefore due consideration should be given to help displace HGV movements from the local highway where possible, to reduce the carbon footprint and maximise the use of the river. Further detail must be provided on the use of the river within the supply chain for the movement of construction materials and waste where appropriate. Finally, it is noted that not all the biodiversity lost as a result of the development can be replaced onsite and it is the intention to purchase Biodiversity Units as a means of meeting the full compensatory requirement. The PLA's Thames Vision 2050 has an aspiration to improve the habitats and the estuarine environment of the Thames and would be willing to work with Kimberly Clark to achieve this goal

Natural England

Thank you for your consultation on the above dated 29 April 2026 which was received by Natural England on 29 April 2026.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Environment Agency

Thank you for consulting us on the above application which we received on 29 April 2026. As part of this consultation, we have reviewed the available documents via the planning portal and specifically the following documents:

- Application Form (PP-14784927, 10/04/2026)
- Flood Risk Assessment & Drainage Strategy (682039-R1(1)-FRA, April 2026, Hyro Energy Ltd)
- Site Plan – Proposed (3001954-AME-NF-ZZ-DR-PL-6052, 26/03/2026, Ameresco)

Environment Agency position

We have no objection to the proposed application subject to the following planning conditions being included in any permission granted.

The proposed development will be acceptable, if a planning condition is included requiring the submission and validation of a detailed land contamination management strategy for unsuspected contamination during the enabling, construction and/or development works

Please refer to the following sections for our full response and informatives for the development:

- Section 1: Technical Comments
- Section 2: Conditions and Informative
- Section 3: Advice to Local Planning Authority / Applicant

Please note that our comments are based on the details available to us at the time of writing. If any subsequent changes are made to the application, please reconsult us.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you have any queries regarding this response, please contact me.

UK Power Networks

No objection.

Southern Gas

Thank you for your enquiry, there is a high pressure pipeline in the vicinity of your works. Your proposals would require the exact location of this pipeline and other SGN assets to be located before any work commences, either by electronic detection or by hand excavated trial holes as specified in the attached SW/2 document. These works must be supervised by an SGN representative, please contact Thomas Skinner on 07974455867 / thomas.skinner@sgn.co.uk to arrange a pre-works site visit and any future supervision. We would like to reiterate that no works should be carried out within the vicinity of a high pressure pipeline until consultation with an SGN representative has occurred. We thank you for your patience at this time

Please note that no mechanical excavations are permitted within 3m of the pipeline at any time.

This pipeline is registered with the Health and Safety Executive as a Major Accident Hazard Pipeline.

SGN High Pressure Gas Pipelines in the vicinity of your works		
Pipeline Number	Pressure Regime	Building Proximity Distance (Zone 1)
GM20	HP	9.0
This table does not include SGN's low medium and intermediate pressure assets, which may be in the vicinity.		

Building Proximity Distance

The building proximity distance (Zone 1) for the pipeline is shown in the table above for all our high pressure gas pipelines in the vicinity of your works. This should not however be confused with the HSE consultation zones 2 & 3 which will be considerably greater, further guidance of the requirements can be found in HSE Document: PADHI: HSE's Land Use Planning Methodology. Zone 1 is a safety factor with reference to habitable buildings as recommended by IGE TD/1. It is calculated from the diameter, material, wall thickness and pressure of the particular pipeline. Under Pipeline Safety Regulations 1996 this distance is declared to the HSE. Any intrusion within this safety zone will not be taken lightly and any intention to proceed should be accompanied by a risk assessment or provision of other supporting evidence, especially in the event of any legal proceedings at a later date.

Vehicle Crossing

Vehicle crossings over the pipeline must be kept to a minimum and must cross at 90 degrees. The crossing will require agreement with SGN and may require design and calculations, as evidence to prove there is minimal added stress to the pipeline. Method statements must be agreed before works commence.

The pipeline is of prime importance to the gas supplies of this area. It is essential that you comply with the restrictions detailed below and in the document SGN/WI/SW/2 in order to protect our plant and equipment and for the safety of your own operatives. A SGN representative must be contacted before any works commence. Further guidance / restrictions are detailed below:

1. No mechanical excavation is allowed within 3 metres either side of pipeline.
2. No plant or storage of equipment shall be made within any easement strip.
3. If any metallic pipes or cables are being laid in proximity to gas pipelines then interference testing will be required, the cost of which to be borne by the promoter of the works. A minimum clearance of 600mm is required.
4. All precautions stated in publication SGN/WI/SW/2 (Safe Working in the Vicinity of High Pressure Gas Pipelines) shall be fully complied within all respects. Acceptance of SGN/WI/SW/2 shall be acknowledged by the responsible site person signing and returning the form Appendix A (back page) to the SGN representative contacted in (7).
5. No thrust boring shall take place within 3 meters of the pipeline.
6. All planting within the easement strip should comply with 'Notes for Guidance on Tree Proximity'.
7. Before commencing work on site you must contact our Pipeline Maintenance Section on the number above at least seven days before work commences. A Southern Gas Networks representative will then contact you to arrange to visit site. Details of working near to high-pressure gas pipelines can then be discussed.
8. Pipeline sections that are planned and agreed by SGN to be permanently covered (i.e. by road surface) will require a coating survey. SGN will repair any indicated coating defects free of charge. The survey costs will be borne by the promoter of the works. Prior to any surface cover cathodic protection coupons and reference cells will require installation at no cost to SGN.
9. This pipeline is cathodically protected and as such has test cables located in test posts, were these to be lost through this work we would look to you for remedial action at no cost to SGN.
10. Intrusive construction methods will require an agreed method statement prior to work starting.
11. Any extended period of SGN site supervision may incur charges to you. These will be charged based on visiting times, materials and occurrences. You will be informed when these come into effect and be invoiced direct.
12. Any piling or boreholes within 15 metres of the pipeline may require vibration monitoring. No piling or boreholing must take place within 3 metres of the pipeline.

Please ensure these conditions, together with any relevant drawings are forwarded for use by the construction personnel of your works.

Please note that further restrictions on activities may need to be imposed as a result of a site inspection.

Southern Water

Thank you for your correspondence, please see our comments below regarding the above application.

Development Site is not within Southern Water's Supply Area

The development site is not located within Southern Water's statutory area for water supply services. Please contact Thames Water who are the relevant statutory undertaker.

Proposed SUDS features

If it is the intention of the developer for Southern Water to adopt the proposed SuDS, the system shall be designed and constructed in line with the Design and Construction Guidance www.water.org.uk/sewage-

sector-guidance-approved-documents/

No Soakaways should be connected to the public surface water sewer.

The supporting documents make reference to drainage using Sustainable Drainage Systems (SuDS). Where SuDS form part of a continuous sewer system, and are not an isolated end of pipe SuDS component, adoption of SuDS will be considered if requested by the developer if they comply with: Design and Construction Guidance (Appendix C), CIRIA guidance and Southern Water SuDS Guidance available here:

<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>

<https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS>

<https://www.southernwater.co.uk/media/l4ndl3db/suds-final-080824.pdf>

Where SuDS rely upon facilities which are not adoptable by sewerage undertakers the applicant will need to ensure that arrangements exist for the long-term maintenance of the SuDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system.

Thus, where a SuDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SuDS scheme.
- Specify a timetable for implementation.
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime. This initial assessment does not prejudice any future assessment or commit to any adoption agreements under Section 104 of the Water Industry Act 1991.

Tree Planting

We have restrictions on the proposed tree planting adjacent to Southern Water sewers, rising mains or water mains. Reference should be made to Southern Water's publication "A Guide to Tree Planting near water Mains and Sewers" (https://www.southernwater.co.uk/media/pddob0vn/ds-tree-planting-guide-1_nwm.pdf) and the Sewerage Sector Guidance (<https://www.water.org.uk/sewerage-sector-guidance-approved-documents/>) with regards to any landscaping proposals and our restrictions and maintenance of tree planting adjacent to sewers, rising mains and water mains.

Condition: In order to protect public apparatus, Southern Water requests that if consent is granted, the following pre commencement condition is attached to the planning permission; The developer must advise the local authority (in consultation with Southern Water) of the landscaping proposals in proximity of public apparatus in order to protect it in accordance with Southern Water's guidance, prior to the commencement of the development.

No foul drainage required for this application.

Neighbouring properties

A site notice was displayed near the site; 395 surrounding properties were consulted and 1 comment was received objecting to the scheme.

Summary of objection:

- Concerns raised regarding noise levels, citing present noise levels as incessant.

Officer's Analysis

Principle of Development

Policy CS02 of the Local Plan Core Strategy (2014) states:

4.2.26 The strategy prioritises development in the urban area as a sustainable location for development. This will be achieved by:

- Promoting 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;
- The continued development of a new sustainable mixed use community in the Ebbsfleet (Gravesham) Opportunity Area, which will include the provision of high quality employment floorspace;
- Revitalising the Gravesend Town Centre Opportunity Area as a focal point for retail, leisure, cultural and tourism facilities and small scale office provision to serve the needs of the Borough whilst preserving and enhancing its character as a riverside heritage town; and
- Bringing forward a range of suitable sites in other parts of the urban area for residential and employment development, including Land at Coldharbour Road Key Site.

Policy CS03 of the Local Plan Core Strategy (2014) states:

4.4.30 The Swanscombe Peninsula East Riverside Industrial Area, Kimberly Clark Site and Imperial Business Estate will be retained in employment use. The Council will support proposals which expand and support their operation.

Policy CS07 of the Local Plan Core Strategy (2014) states:

5.1.33 In considering development proposals, particular support will be given to schemes incorporating small and flexible industrial and/or office workspaces of high quality intended to support the start-up and expansion of small and medium sized enterprises. The Council will also support the refurbishment and upgrading of existing industrial and commercial premises and improvements in information and communications technology to facilitate more flexible working practices and the changing economic needs of the Borough.

Policy CS18 of the Local Plan Core Strategy (2014) states:

5.14.42 The Council will seek to reduce the overall carbon footprint of the Borough. In particular, the Council will:

- **In the context of national policy on the transition to zero carbon development via amendments to Part L of the Building Regulations, require proposals for development of the Key Sites throughout the Borough and other major development elsewhere in the Gravesend Town Centre Opportunity Area to consider the potential and include proposals for low carbon and renewable energy generation, including combined heat and power. Where choosing not to do so, applicants must submit evidence which demonstrates that compliance is not technically or financially feasible or that improved fabric energy efficiency or an allowable solution results in improved carbon saving benefits;**
- **Support stand-alone decentralised, renewable or low carbon energy development where it is compatible with national policies for protecting the Green Belt and where it accords with policies in this plan, in particular those relating to Development and Design Principles, Transport, Green Infrastructure, and Heritage and the Historic Environment; and**
- **Support other proposals which lead to a reduction in carbon footprint including the retrofitting of existing homes and businesses, including local initiatives based on carbon off-setting via allowable solution**

In terms of Local Planning Policy, this site is located in an urban area, which is prioritised for development as a sustainable location. 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 paper mill industry on the site. The proposal represents infrastructure necessary to facilitate the previously approved low-carbon hydrogen project, and the proposal should be supported where it accords with all other policies in the plan, as was the case with the hydrogen facility. The support for such development is reflected within the National Planning Policy Framework (2024), in particular, at paragraph 167 it 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.*'. Not only is this of benefit for environment and climate change, but it would help to create the conditions in which this local industry can invest, expand, and adapt.

The proposal would clearly therefore result in a positive impact in terms of the NPPF's economic and environmental goals, which lie at the core of the NPPF's definition of sustainable development. In terms of the social goals, there is some community benefit, by supporting investment and growth of local businesses, local employment would be protected and created. There are residences surrounding the site and so to ensure that the social arm of sustainable development is upheld, the design should consider the impacts on the surrounding occupiers and the character and appearance of the area.



8. 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.

Design, Character and Appearance

The proposed building would be located on an existing industrial site, and so its location would be appropriate for the existing setting. It would however be located on an area of greenery and so consideration should be given to the loss of soft landscaping, plus any trees in the vicinity which would be removed and how this can be mitigated both visually and with regard to the required Biodiversity Net Gain requirements.



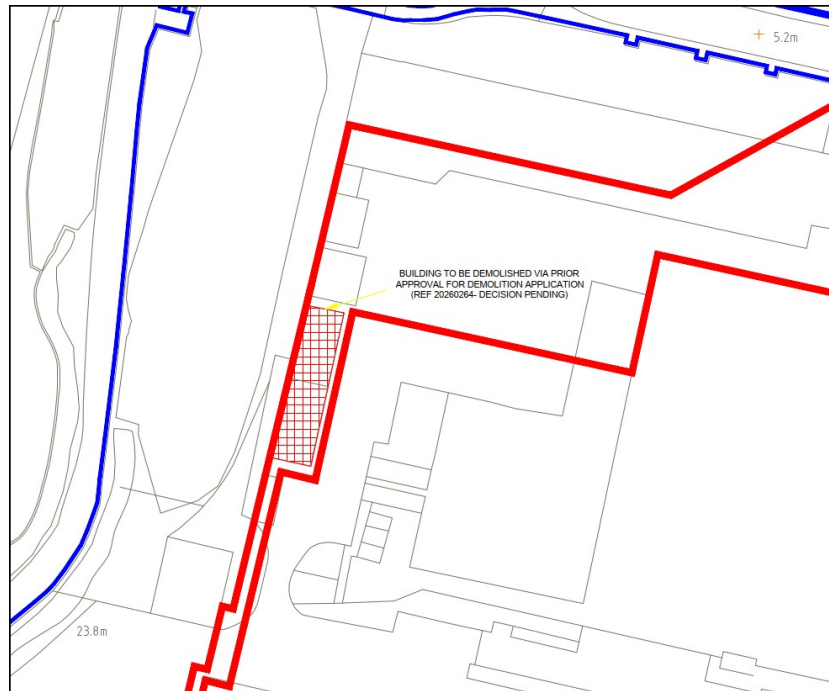
Area of proposed building – Taken by case officer on 05.02.26



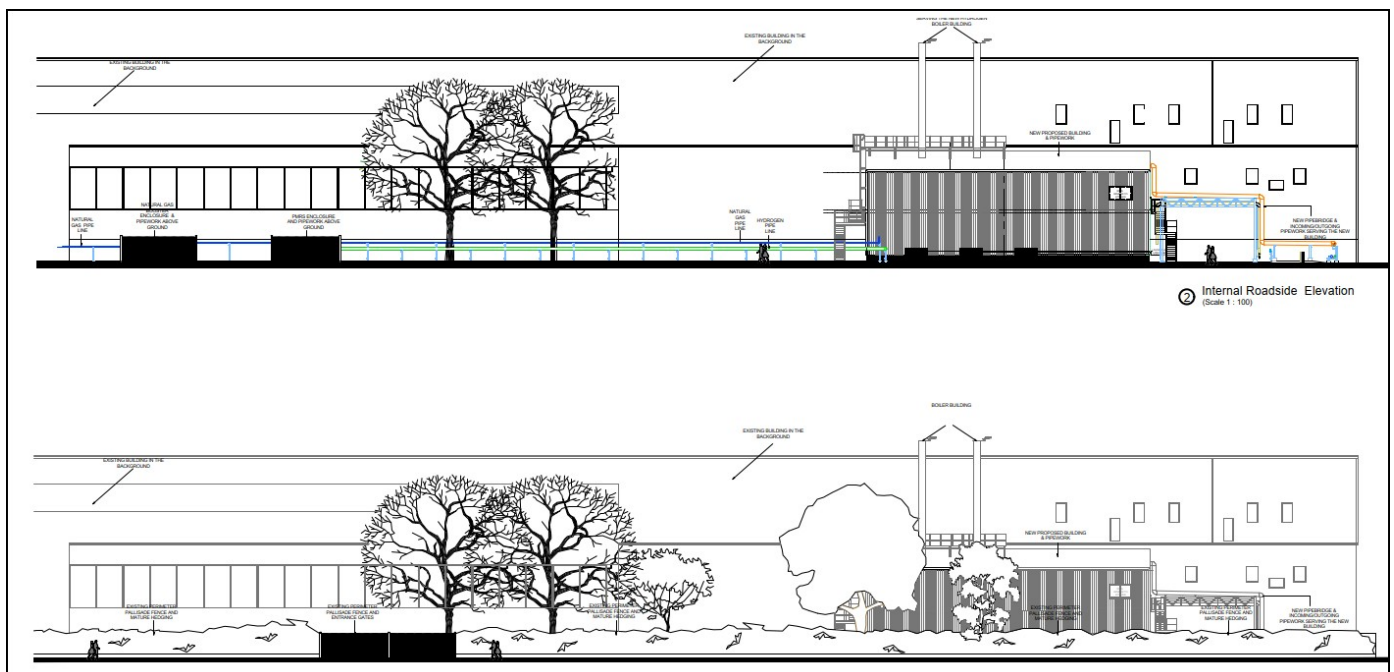
Proposed Site Plan (Not to Scale)

The proposed building appears to be of reasonable size, standard industrial appearance and although likely visible from the streetscene, depending on streetscene elevation, it would likely not be significantly impactful, given the existing industrial setting and other nearby large industrial buildings. It is 25.9m wide and 15.3m deep, with lean to style roof with a height between 8.6m and 10.1m.

It is also noted that, a length of pipework would run behind the buildings due to be demolished to the west as indicated by the arrow below.



The below plan shows the internal and external roadside elevation. Whilst the building would be visible from the street, it would be partially obscured, by existing hedging and when viewed against the backdrop of the existing larger building, beyond, it would be a clearly subservient addition which would fit the existing industrial character. It is also noted that it would be set back by 26.8m from the highway, further limiting its visibility from the pedestrian perspective.



Whilst the proposal also includes two 20 metres high flues together with associated elevated pipework and pipe supports, these are typical industrial features which would be viewed within the context of the existing mill complex and would not appear incongruous.



Google earth image from Crete Hall Road, facing into the site.

On balance, the proposed development would comply with the requirements of Policy CS19 of the Core Strategy 2014 and paragraph 135 of the NPPF (2024) in terms of design, character and appearance.

Neighbouring Amenity

The NPPF (2024) states that planning decisions should aim to secure a high standard of amenity for all existing and future users. The impact on amenity is also considered with regard to the criteria with Policy CS19 of the Core Strategy, which states that new development should be located, designed and constructed to safeguard the amenity, including privacy, daylight and sunlight, of its occupants, and those of neighbouring properties and land.

The site is set away from the residential area, and the nearby residences are atop a cliff. As such, the scheme would not result in significant impact to residential neighbours with regard to overbearing bulk, overshadowing or overlooking. However, it is noted that noise impacts, air quality and contamination should also be considered.

Air Quality

The application is supported by an Air Quality Assessment which considers the likely effects of replacing the existing gas-fired boilers with dual fuel boilers capable of operating primarily on hydrogen. The assessment compares emissions from the existing and proposed boiler flues and concludes that the proposal would result in only negligible changes to local air quality.

The GBC Environmental Protection Officer has reviewed the submitted assessment and raises no objection, advising that the detailed modelling predicts only very minor changes in pollutant concentrations which would not result in any detrimental impact on local air quality. The Environmental Protection Officer has also advised that the development is likely to require an Environmental Permit from the Environment Agency, which will regulate emission limits and stack performance through separate legislation.

Taking these matters into account, it is considered that the proposal would not result in unacceptable impacts on local air quality.

Noise Impact

The application is accompanied by a Noise Impact Assessment which considers the operational noise associated with the proposed boiler house and associated plant. The assessment has been undertaken using the methodology contained within BS4142 and assesses the likely impact upon nearby residential receptors.

The Council's Environmental Protection Officer has reviewed the submitted assessment and is satisfied with its methodology and conclusions. The assessment demonstrates that the rating level of the proposed plant would be between 4dB and 7dB below the existing background noise level, which is already influenced by surrounding industrial activities and traffic. As such, the Environmental Protection Officer raises no objection subject to the plant and equipment being installed in accordance with the submitted details and specifications.

Whilst one representation has raised concerns regarding existing noise levels within the area, the submitted evidence demonstrates that the proposal would not materially increase noise levels experienced by neighbouring occupiers. Subject to a condition securing implementation in accordance with the approved Noise Impact Assessment, the proposal is not considered to result in unacceptable impacts upon residential amenity.

Contamination

The application is supported by a Geoenvironmental Appraisal comprising a Phase 1 Preliminary Risk Assessment and Phase 2 Intrusive Investigation. The submitted investigations conclude that no significant contamination has been identified across the site, with all recorded contaminant concentrations below the relevant Generic Assessment Criteria for the proposed commercial end use. Ground gas monitoring also identified no methane and only low concentrations of carbon dioxide, such that gas protection measures are not considered necessary.

The Council's Environmental Protection Officer has reviewed the submitted information and raises no objection to the proposal. Whilst no further site investigation or remediation works are considered necessary, a watching brief condition is recommended to ensure that any previously unidentified contamination encountered during construction is appropriately investigated and remediated. The Environment Agency also raises no objection, subject to a condition requiring a land contamination management strategy in the event that unsuspected contamination is encountered during the development works.

Subject to the recommended planning conditions, the proposal is considered acceptable in respect of land contamination.

The proposal is therefore considered to safeguard the amenity of neighbouring properties, subject to the imposition of planning conditions, in compliance with policy CS19 of the Core Strategy 2014.

Biodiversity

The application proposes development on a parcel of land that is currently grassed and devoid of development.

Ecology

The application is supported by a Preliminary Ecological Appraisal which assesses the ecological value of the site and the potential effects of the proposed development on habitats and protected species. The application site comprises an area of managed grassland within an established industrial complex and is considered to be of relatively low ecological value, whilst recognising opportunities to deliver appropriate ecological enhancements.

The Kent County Council Biodiversity team have reviewed the submitted ecological information and confirm that sufficient information has been provided to determine the application. The consultee is satisfied that, subject to appropriate mitigation, the proposal would not result in unacceptable impacts on protected species or biodiversity. No further surveys are required in respect of bats or great crested newts, although a Precautionary Working Method Statement is recommended to safeguard protected species during the construction phase.

The submitted ecological appraisal recommends biodiversity enhancement measures including bird and bat boxes, log piles and hibernacula together with an appropriate external lighting strategy to minimise impacts on nocturnal species. KCC Biodiversity also recommended the submission of a Landscape and Ecological Management Plan (LEMP). However, having regard to the nature of the proposal, comprising a boiler house and associated infrastructure within an operational industrial site, it is considered that the recommended LEMP would extend beyond what is necessary to make the development acceptable. Much of the suggested wording relates to features that are not proposed as part of the development, including extensive habitat creation, SuDS planting and other landscape measures.

Instead, it is considered that the identified ecological mitigation can be secured through a more proportionate set of planning conditions requiring a Precautionary Working Method Statement, planting plan, biodiversity enhancement measures and, where required, an external lighting strategy. These conditions are considered to directly relate to the development proposed and appropriately secure the mitigation identified within the submitted ecological information.

Subject to these planning conditions, the proposal is considered acceptable in ecological terms and complies with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (2014) and paragraph 187 of the National Planning Policy Framework (2024).

Biodiversity Net Gain

The Environment Act 2021 requires qualifying development to deliver a minimum 10% Biodiversity Net Gain (BNG). The submitted Statutory Biodiversity Metric demonstrates that the development would result in a loss of existing habitat and that the required biodiversity gain cannot be achieved wholly within the application site. Consequently, off-site biodiversity units will be required to achieve the statutory biodiversity uplift.

Kent County Council Biodiversity have reviewed the submitted Biodiversity Metric and confirms that sufficient information has been provided to determine the application. The consultee advises that the proposed on-site habitat creation would not constitute significant on-site gains and accepts that off-site biodiversity gain will be required to satisfy the statutory requirement.

The statutory Biodiversity Gain Condition imposed by Schedule 7A of the Town and Country Planning Act 1990 (as amended) prevents the commencement of development until a Biodiversity Gain Plan has been submitted to and approved by the Local Planning Authority. The development would be subject to the statutory Biodiversity Gain Condition under Schedule 7A of the Town and Country Planning Act 1990 (as amended), which prevents development commencing until a Biodiversity Gain Plan has been approved by the Local Planning Authority. The required statutory biodiversity gain information will be included as an informative on the decision notice.

Subject to the statutory Biodiversity Gain Condition, the proposal is considered to accord with Policies CS12 and CS19 of the Gravesham Local Plan Core Strategy (2014), the Environment Act 2021 and paragraph 187 of the National Planning Policy Framework (2024).

Conclusion

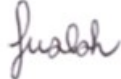
The proposed development has been considered against national and local planning policies. It is concluded that the development would not result in unacceptable harm in respect of design, neighbouring amenity, ecology, biodiversity, highway safety, flood risk or land contamination. Subject to the

recommended planning conditions, the proposal is considered to accord with the Gravesham Core Strategy (2015) and the National Planning Policy Framework (2024).

Recommendation

The recommendation is to approve the application subject to conditions.

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Lisa Fisher	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	23 rd July 2026	Dated:	24 July 2026