

Planning Application for the development of a Pulp Laydown area and associated infrastructure at Kimberly–Clark Northfleet Mill, Northfleet, Gravesham, Kent.

Planning, Design and Access Statement.

On behalf of Kimberly–Clark Ltd..

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1. Introduction

- 1.1. This Planning, Design and Access Statement has been prepared by Pegasus Group on behalf of Kimberly-Clark Ltd. (the “Applicant”) and accompanies and supports a full planning application for the development of a pulp laydown area and associated infrastructure at Kimberly-Clark Northfleet Mill, Northfleet, Gravesham, Kent.
- 1.2. The purpose of this report is to assess the proposed development and its acceptability in planning terms, with regard to the adopted Development Plan and any other pertinent material considerations to the determination of the application.
- 1.3. The report takes the following structure:
 - **Introduction** – provides the introductory context to the statement;
 - **The Application Site** – presents a detailed description of the application site, its wider context and planning history;
 - **The Proposed Development** – provides a description of the proposed development;
 - **Design and Access Statement** – provides detail on the design of the proposed development and its associated access;
 - **Planning Policy Context** – sets out the planning policies and guidance documents relevant to the proposed development;
 - **Assessment of Proposed Development** – assesses the proposed development against the relevant planning policies and other material considerations;
 - **Conclusion** – provides the concluding remarks of the statement.

2. The Application Site

2.1. This chapter of the statement provides details of the application site, its wider context and planning history.

The Application Site

2.2. The application site relates to approximately 0.51 hectares of land located immediately to the north of the Kimberly-Clark paper mill in Northfleet, on the southern bank of the Thames Estuary. The submitted Site Location Plan (ref: 05135-RES-LAY-DR-PT-010) details the full extent of the application site for planning purposes.

2.3. The application site is located within the development limits of Northfleet. Figure 1 below shows the approximate location of the application site (dashed red outline) within the context of the Policies Map.

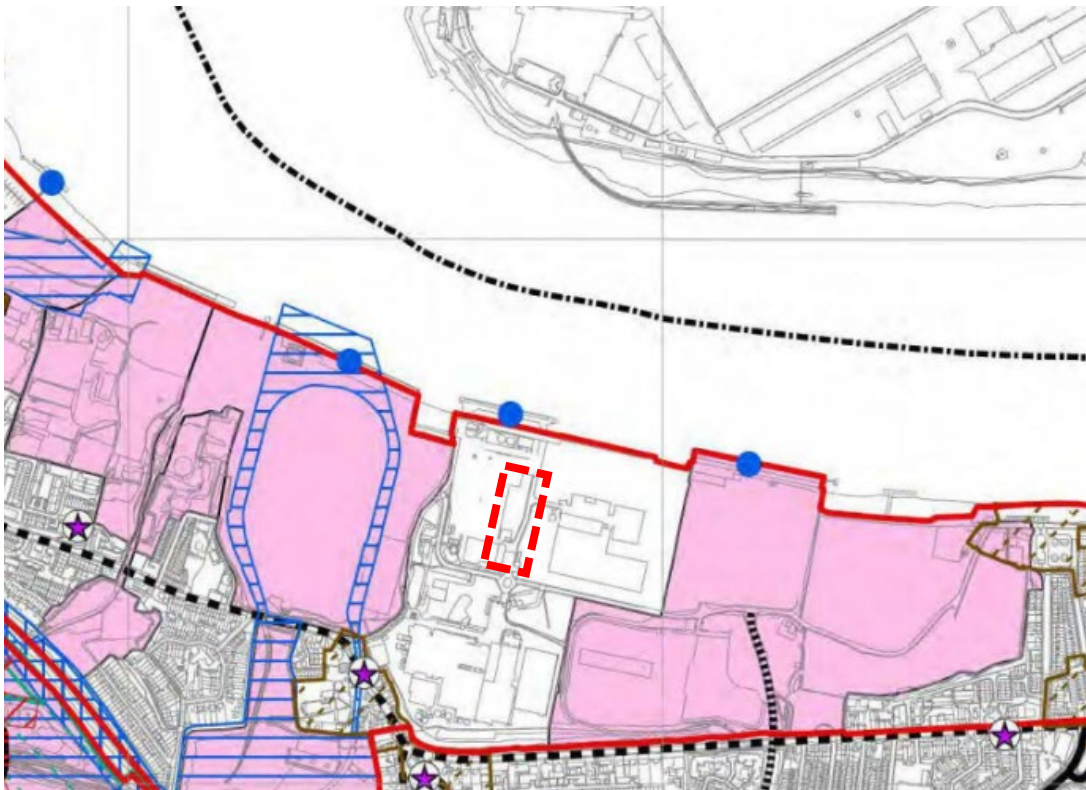


Figure 1: Location of site within Gravesham Local Plan Policies Map.



Figure 2: Key for Policies Map

- 2.4. As per the above map and associated key, the application site falls within an Opportunity Area (Policy CS03), which forms part of the Council's regeneration framework.
- 2.5. The site is not subject to any other Local Plan designations. The wider Kimberly–Clark site abuts two 'key sites' to the east and west, which also fall within the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area policy. These key sites have been identified by Gravesham Borough Council as being suitably located for strategic employment and residential development along the Thames Riverside. These key sites are not deemed relevant to this proposed development.
- 2.6. The site is not located within a conservation area and contains no listed buildings. There is a listed building in close proximity to the site, which is:
 - Northfleet Tower Lighthouse: Grade II listed – approx. 239m from proposed site;
- 2.7. The site is for the most part located within Flood Zone 2 and marginally within Flood Zone 3 to the north of the development.
- 2.8. Figure 3 below shows the location of the site within the context of the Environment Agency's Flood Risk Map.

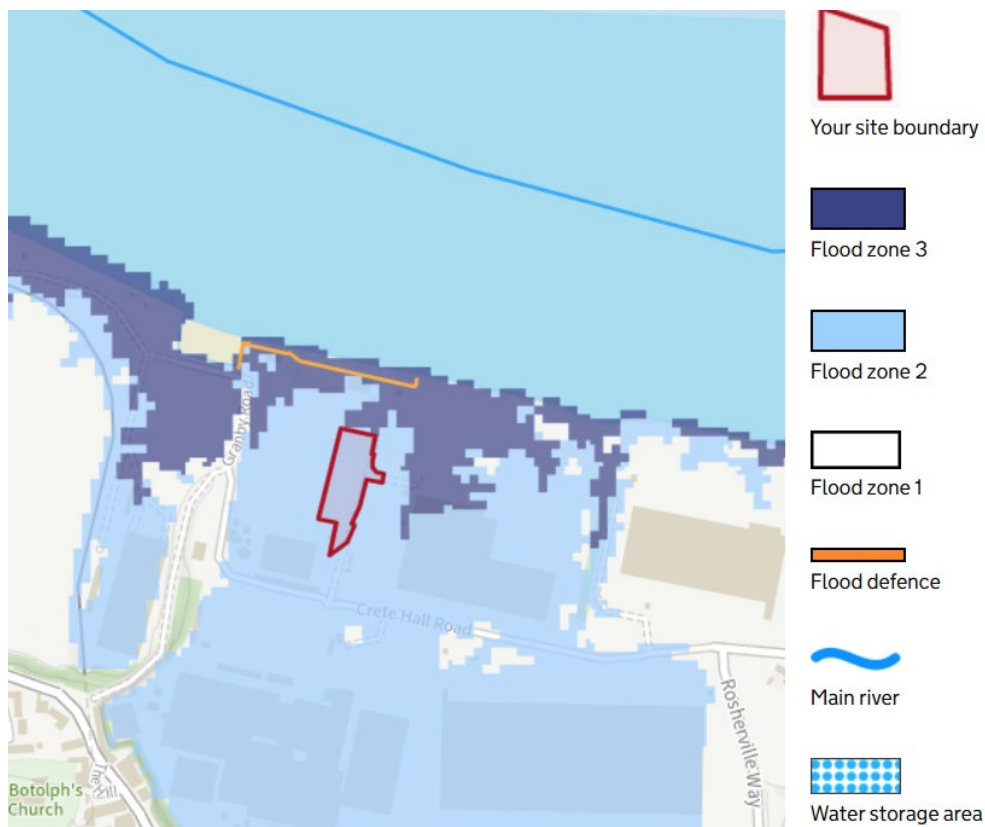


Figure 3: Site location within Environment Agency's Flood Risk Map for Planning.

- 2.9. According to Environment Agency's Risk Map for Surface Water, the site is not under significant risk. Figure 4 below shows the site in context of surface water extents.

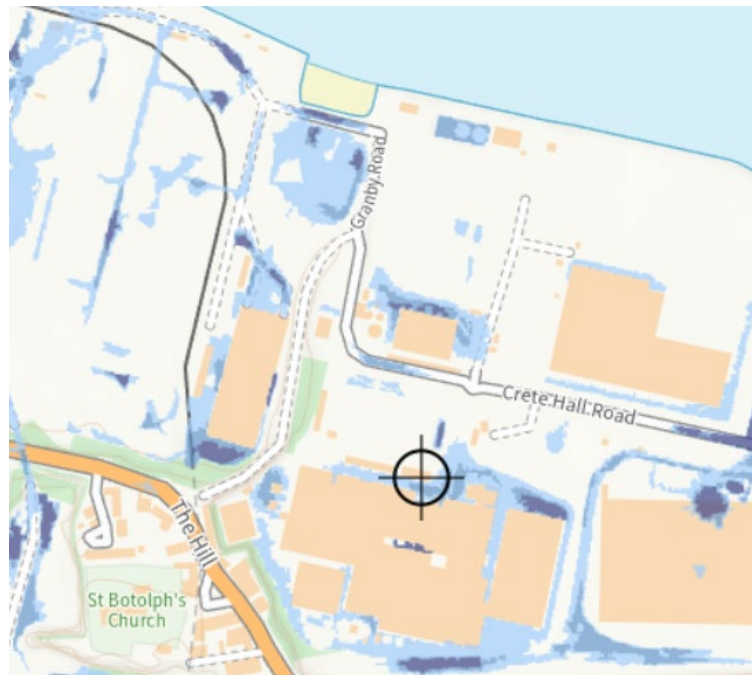


Figure 3: Site location within Environment Agency's surface water flood risk map.

- 2.10. A search using DEFRA's Magic Map application has identified that the application site is not currently subject to any ecological or landscape designations.

3. The Proposed Development

- 3.1. The proposals consist of the construction of a pulp laydown area and associated infrastructure at the Kimberly–Clark Northfleet mill in Northfleet, DA11 9AD.
- 3.2. This will involve the construction of a concreted area to act as a pulp laydown area, which is fundamental to tissue mill operations and is a temporary store for bales of wood pulp which arrive at site via the nearby jetty on the River Thames on a regular basis.
- 3.3. The pulp laydown area will be composed of a new reinforced concrete area, which will include vehicle crash barriers and palisade fencing with a vehicle access gate to the eastern side of the development. The design will also include an updated footpath connecting the north of the Kimberly–Clark facility to the entrance to the mill on Crete Hall Road.
- 3.4. Due to the consented proposal for a green hydrogen electrolyser facility being located on the existing pulp laydown area at the mill, the current laydown area needs to be relocated to the proposed area east of the mill's effluent treatment tanks. Currently, the proposed site comprises mainly of a mown grassed area of approximately 0.51ha and lies between the current pulp store and the entrance to the mill on Crete Hall Road.
- 3.5. As a result of the new pulp laydown area being relocated, the Applicant is required to relocate 2 no. fire hydrants approximately 23 metres to the east. The movement of the fire hydrants poses no material implication to the proposed development, and the hydrants will still be fully accessible in the unlikely event of a fire.

4. Design and Access Statement

- 4.1. The following section details the design principles which have informed the layout of the proposed development. The scheme has been carefully designed to ensure that the proposals respond wholly to the context of the site. It must be acknowledged that the layout, scale and appearance of the proposal is very much reflective of the nature and use of the scheme and the individual elements that it comprises.

Layout

- 4.2. The final scheme as submitted is detailed upon the submitted plans. These plans outline the position of the pulp laydown area and the proposed access.

Use

- 4.3. The proposed development will provide Kimberly-Clark with a new purpose-built area to store bales of wood pulp which arrive at site via the nearby jetty on the River Thames on a regular basis.
- 4.4. This area is known as the 'pulp laydown area' and is being relocated within the Kimberly-Clark site to accommodate the consented Green Hydrogen Electrolyser in its original location. Given the proposed development is located within the wider Kimberly-Clark mill site, the development is logically placed.

Amount

- 4.5. The proposed development comprises a concrete slab of approximately 0.51 hectares in size, including palisade fencing, vehicle access gate and vehicle crash barriers. The proposals also comprise a new pedestrian footway and a vehicular access point.

Scale

- 4.6. The scale of the development has been determined by the operational requirements of Kimberly-Clark and the necessity to store the incoming pulp which is essential to tissue paper production.

Landscaping

- 4.7. Fundamentally, the proposals are well-suited to the surrounding industrial context of the area and the adjacent factory itself. The development will be suitably screened by the changing levels to the south of the site. The proposals include the provision of security fencing, which again is characteristic of the area.

Access

- 4.8. As detailed in the submitted Transport Statement, the primary construction and operational route will bring vehicles into the site via Crete Hall Road and into the existing entrance off the roundabout on Crete Hall Road. No site entrance upgrades will be required.

5. Planning Policy Context

- 5.1. This chapter of the statement details the planning policies relevant to the planning application.

Legislative Background

- 5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 required that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) is a key material consideration in the determination of planning applications and also sets out the framework of policies with which development plans must be in accordance.

- 5.3. For the purposes of Section 38(6), the Development Plan for Gravesham currently consists of:

- Gravesham Local Plan Core Strategy and Local Plan Policies Map (adopted September 2014);
- Gravesham Local Plan First Review (1994) – Saved Policies;
- Kent County Council Minerals and Waste Local Plan 2013–30 (2020).

Gravesham Local Plan Core Strategy (2014)

- 5.4. The Local Plan Core Strategy is the main document in the Gravesham Local Plan. Its role is to:

- Set out a long-term vision for the future of Gravesham based on evidence of need to support communities and outline what makes Gravesham a distinctive and attractive place to live and work.
- support and inform; sustainable development via investment in infrastructure, economic development, and regeneration proposals within the borough, while promoting healthy communities
- provide a consistent basis for planning application decisions.

- 5.5. The relevant policies from the Gravesham Local Plan Core Strategy (2014) are listed below.

- 5.6. Policy CS01 establishes that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF.

- 5.7. Policy CS02 establishes a hierarchy for the scale and distribution of development within Gravesham.

- 5.8. Policy CS03 states that the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration. The policy also acknowledges the Kimberly-Clark site and states that the Council will support proposals which expand and support their operation.

- 5.9. Policy CS07 states that the Council will support the refurbishment and upgrading of existing industrial and commercial premises.
- 5.10. Policy CS11 states that new developments should mitigate their impact on the highway and public transport networks as required.
- 5.11. Policy CS18 states that in exception of the previously developed sites along the Thames Riverside (re. Policy CS03) and other sites that have been previously evaluated with the sequential and exception tests, development will be directed sequentially to those areas least at risk of flooding. Furthermore, proposals in areas at risk of flooding should be accompanied by a Flood risk Assessment and a Flood Risk Management Plan (if required).
- 5.12. Policy CS19 envisions that new development will be visually attractive, fit for purpose and locally distinctive. Development will conserve and enhance the character of the built, historic, and natural environment.

National Planning Policy Framework

- 5.13. The National Planning Policy Framework (NPPF) (the “Framework”) was first published in 2012 and most recently revised in December 2024. The Framework sets out the UK Government’s planning policies for the planning system to ensure that it helps to achieve sustainable development, which Paragraph 7 cites to be the overall purpose of the planning system. The Framework forms a material consideration in the assessment of all planning applications. Paragraph 3 confirms the Framework should be read as a whole.
- 5.14. Paragraph 11 of the National Planning Policy Framework (NPPF) establishes the presumption in favour of sustainable development that should underpin decision making.
- 5.15. Paragraph 85 of the NPPF states that planning 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.
- 5.16. Paragraph 87 states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for:

“Storage and distribution operations at a variety of scales and in suitably accessible locations that allow for the efficient and reliable handling of goods, especially where this is needed to support the supply chain, transport innovation and decarbonisation.”
- 5.17. Paragraph 116 of the NPPF outlines that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 5.18. Paragraph 170 of the NPPF 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.

6. Assessment of Proposed Development

- 6.1. The following section of this report assesses the development proposals against the policies of the Development Plan and national planning policy. It is considered that the key issues in the determination of the application are the principle of development, the impact upon landscape, amenity, and biodiversity.

Principle of Development

- 6.2. This application seeks permission for a pulp laydown area and associated infrastructure at the Kimberly-Clark Northfleet Mill, Northfleet.
- 6.3. The proposed pulp laydown area is fundamental to tissue mill operations and is a temporary store for bales of wood pulp which arrive at site via the nearby jetty on the River Thames on a regular basis.
- 6.4. Due to the consented proposal for a green hydrogen electrolyser facility at Northfleet, the pulp laydown area needs to be relocated to the proposed site, located to the east of the mill's effluent treatment tanks.
- 6.5. Policy CS07 of the Gravesham Local Plan Core Strategy clearly establishes policy support for the refurbishment and upgrading of existing industrial and commercial premises.
- 6.6. This support for existing and commercial premises is further established with Policy CS03 which states that the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area is a substantial opportunity for major riverside regeneration. The policy also acknowledges the Kimberly-Clark site and states that the Council will support proposals which expand and support their operation.
- 6.7. The support for business is replicated in the NPPF, which paragraph 85 of the NPPF states that planning decisions should help create the conditions in which businesses can invest, expand and adapt.
- 6.8. It is therefore considered that the development is in accordance with policies CS07 and CS03 of the Gravesham Local Plan Core Strategy and the NPPF.

Landscape and Visual Amenity

- 6.9. Policy CS12 of the Local Plan states that "the overall landscape character and valued landscape will be conserved, restored and enhanced."
- 6.10. The proposed development is located in a heavily industrialised area, which is characterised by factories, warehouses and other existing tall structures which are ancillary to operations in the area.
- 6.11. The proposed development accords with the existing context of the area, with some change proposed but to no unacceptable effect. There are no extant landscape designations on the proposed site and as such it is foreseen that the visual impact of the proposals will be negligible.

- 6.12. The industrial area as a whole is well screened from the nearest residential properties due to the dramatic change in levels to the south of the site. There is also considerable planting on London Road which suitably buffers the views to the industrial area. As such, the proposals adhere to the policies set out in the Local Plan.

Ecology and Biodiversity

- 6.13. Policy CS12 of the Local Plan states that “there will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought.”
- 6.14. A Preliminary Ecological Appraisal has been prepared in support of this application. The report states that it is unlikely that the proposed development will impact any protected species, nor is the proposed site suitable for such habitats.
- 6.15. The planning application is also supported by a Biodiversity Net Gain Metric, which indicates that the proposed development will achieve a 153.93% net gain in habitat units, which is to be achieved by utilising off-site space within Kimberly-Clark’s ownership to facilitate the gains proposed.
- 6.16. As such, the proposed development is compliant with Policy CS12 of the Local Plan.

Transport and Highways

- 6.17. Policy CS11 of the Local Plan states that “new developments should mitigate their impact on the highway and public transport networks as required. Transport assessment work is required to be undertaken in accordance with national and local policy guidance, and to identify detailed highway and public transport network requirements and management arising from the development.”
- 6.18. A Transport Statement has been submitted in support of this planning application. The report details the route to the site for construction traffic, indicating that the proposed access to the site is suitable and safe for the proposed movements.
- 6.19. The proposed development therefore adheres to Policy CS11 of the Local Plan.

Flood Risk and Drainage

- 6.20. Policy CS18 of the Local Plan states that “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. Proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment (in accordance with national policy and Environment Agency standing guidance as appropriate).”
- 6.21. Given the site is located within the Policy CS03 opportunity area (Northfleet Embankment and Swanscombe Peninsula East), it is assumed that the site falls within the sequential and exception tests that have been undertaken in this area to inform the Council’s Flood Risk policy.

- 6.22. A Flood Risk Assessment has been prepared in support of this planning application, which demonstrates the proposals adhering to Policy CS18. The submitted Flood Risk Assessment notes that the proposed development is classified as 'Less Vulnerable' and as such is considered appropriate within the Flood Zones. This report also concludes that the proposed development should not be precluded on flood risk grounds, given the recommendations made for mitigation.
- 6.23. Notwithstanding the extant policy, the site is optimally located to support the decarbonization of Kimberly-Clark's operations at their Northfleet mill.

7. Planning Balance

7.1. To summarise, the above planning assessment has demonstrated the following:

- This planning application is in compliance with the Development Plan and national planning policy; and
- The impacts associated with the development at this location are very limited, and the proposal is in compliance with the relevant issue specific planning policies in the Development Plan, so do not weigh against the development.

7.2. Whilst it is accepted that the proposal will result in changes to the local environment, those changes are not such that would constitute a breach of the policies contained within the Development Plan. This is also the case where any identified harm can be addressed by way of a planning condition, such as matters of landscaping, highway and drainage, or ecological mitigation and enhancement.

7.3. Notwithstanding this accordance with the development plan, the change to the local environment could be viewed as having an element of harm as a result to a change in the site as a result of this proposal.

7.4. The proposed development has also been identified as being located in an area that has been subject to sequential and exception testing with regard to flood risk by Gravesham Borough Council. Given the industrial nature of the Northfleet Embankment area of the Thames Riverside, the proposed development is suitably located.

7.5. In consideration of compliance with the Development Plan and other planning policy requirements, the benefits associated with the Proposed Development and limited adverse effects, and significant wider benefits, it is clear that this development is, on balance, acceptable in planning terms.

7.6. When considering the compliance with the Development Plan, the benefits and the negligible adverse effects, it can be shown that this development is, on balance, acceptable in planning terms.

7.7. The Proposed Development has been shown to achieve the main objectives of sustainable development (environmental, social and economic) without causing undue detriment to any of these matters.

8. Conclusion

- 8.1. This Planning, Design and Access Statement has been prepared by Pegasus Group on behalf of Kimberly-Clark Ltd. in support of the full planning application for the construction of a pulp laydown area and associated infrastructure at Kimberly-Clark Northfleet mill.
- 8.2. The proposed development will allow Kimberly-Clark to continue its operations efficiently as a key business in Northfleet.
- 8.3. National and local planning policy and guidance is a material consideration in the determination of this planning application. The proposal has been shown to be in compliance with the relevant Development Plan policies.
- 8.4. This statement therefore demonstrates that, upon considering the following matters, this proposal on balance falls within the scope of acceptability.
- 8.5. Accordingly, this proposal represents sustainable development, and as such this planning application should be approved without delay.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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