

Delegated Report

Planning Application

Planning Application No: 20250406

Location: Kimberly Clark Ltd Northfleet Mill Crete Hall Road Northfleet

Description: Development of a pulp laydown area and associated infrastructure.

Applicant: Kimberly-Clark Limited.

Submitted Documents/Plans

Application Form

05135-RES-LAY-DR-PT-010 Rev 1 – Site Location Plan

05135-RES-PRO-DR-PT-010 Rev 2 – Pulp Storage Hardstanding Infrastructure Layout

05135-RES-PRO-DR-PT-011 Rev 1 – Pulp Storage Hardstanding Infrastructure Elevation View

05135-RES-ACC-DR-PE-003 Rev 1 – Proposed Access Route and Construction Support Areas

05135-RES-ERW-DR-PT-001 Rev 1 – Typical Footpath Cross Section

05135-RES-ACC-DR-PE-003 Rev 1 – Proposed Access Route and Construction Support Areas

05135-RES-SEC-DR-PT-012 Rev 1 – Typical Vehicle Barrier (A-Safe)

05135-RES-SEC-DR-PT-011 Rev 1 – Typical Security Fence Detail

05135-RES-SEC-DR-PT-013 Rev 1 – Typical Vehicle Barrier (ARMCO)

Pulp Laydown Existing Area

Ownership Boundary

Access Road Picture

Cultural Heritage Desktop Study

BNG Metric

Flood Risk Assessment

Transport Statement

Planning Design and Access Statement

Preliminary Ecological Appraisal

Phase 1 Geoenvironmental Desk Study Part 1

Phase 1 Geoenvironmental Desk Study Part 2

Phase 1 Geoenvironmental Desk Study Part 3

Cover Letter

Relevant Planning History

Reference	Description	Decision	Decision Date
20250251	Construction and operation of a Green Hydrogen Electrolyser and associated infrastructure.	Permitted	25 September 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	EIA not required	04.04.2024

	infrastructure.		
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)

Consultations, Publicity and Representations

Consultees

Ward Councillors

No comments received.

GBC Environmental Protection

Comments received on 9th June:

There is no objection to this application which is basically a re-location of the existing pulp laydown area. The submitted documents have been reviewed, and the following are advised:

Contaminated Land

The Phase 1 Geoenvironmental Desk Study recommends that a Phase 2 intrusive survey is undertaken due the past and current use of the site and immediate area. This is agreed with and can be dealt with by

the following condition:

No development approved by this permission shall be commenced prior to a contaminated land assessment (in accordance with the Environment Agency's Land Contamination Risk Management (LCRM) guidance) and if necessary an associated remedial strategy, together with a timetable of works, being submitted to the Local Planning Authority for approval.

a) A site investigation, based on the findings of the submitted Phase 1 Geoenvironmental Desk Study by GVR Geoservices Ltd dated 10/02/25 (Report Ref G-22-049A Rev 1) shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology.

b) A site investigation report detailing all investigative works and sampling on site, together with the results of analysis, risk assessment to any receptors and a proposed remediation strategy shall be submitted to the Local Planning Authority. The Local Planning Authority shall approve such remedial works as required prior to any remediation commencing on site. The works shall be of such a nature so as to render harmless the identified contamination given the proposed end-use of the site and surrounding environment including any controlled waters.

c) Approved remediation works shall be carried out in full on site under a quality assurance scheme to demonstrate compliance with the proposed methodology and best practice guidance). If during any works contamination is encountered which has not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the Local Planning Authority.

d) Upon completion of the works, this condition shall not be discharged until a closure report has been submitted to and approved by the Local Planning Authority. The closure report shall include details of the proposed remediation works and the quality assurance certificates to show that the works have been carried out in full in accordance with the approved methodology. Details of any post remediation sampling and analysis to show the site has reached the required clean-up criteria shall be included in the closure report together with the necessary documentation detailing what waste materials have been removed from the site.

e) Where applicable, a monitoring and maintenance scheme to include monitoring the long-term effectiveness of the proposed remediation over an agreed period of time, and the provision of reports on the same, must be prepared and approved in writing by the local planning authority.

Following completion of the measures identified in that scheme, and when the remediation objectives have been achieved, reports that demonstrate the effectiveness of the monitoring and maintenance carried out must be produced and submitted to the local planning authority.

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.

KCC Biodiversity

Comments received on 6th June:

We advise that sufficient information has been provided to determine the planning application.

Protected/Notable Species

We are satisfied with the results of the ecological reports which have confirmed that there is potential for badgers, breeding birds and foraging bats within the site and surrounding area. We are satisfied that there

is no requirement for further surveys to be carried out and any impacts can be avoided through a precautionary mitigation approach.

If planning permission is granted we recommend that the precautionary mitigation detailed in section 6.4 is included within the construction management plan.

The proposed development is within 40m of the River Thames and therefore we advise that best practice construction measures are implemented during construction to minimise impacts from noise and dust on the river.

Biodiversity Net Gain

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications⁶⁵ for development (unless exempt^{66,67},) must deliver at least a 10% biodiversity net gain (BNG). Significant on-site gains, and all off-site gains will need to be secured for at least 30 years

Having reviewed submitted information, we consider this application to fall under mandatory biodiversity net gain so that mandatory biodiversity net gain of 10% will apply.

Any application which is required to achieve a 10% BNG must submit the following information as a minimum¹:

- confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;
- the pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);
- where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;
- 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;
- 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;
- 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); and
- 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).

We advise that sufficient information has been provided with regard to mandated BNG.

The metric has detailed that through habitat creation within the adjacent habitat a BNG of over 10% can be achieved and we agree with this conclusion. However we highlight that there is some overlap between this application and application 20250251 and the submitted biodiversity gain plan (if planning permission is granted) must demonstrate that both applications can achieve over 10%.

The submitted information has detailed that to achieve a 10% the retained habitats within the blueline boundary area will be enhanced. We highlight that any habitat creation or enhancements proposed as part of BNG must be retained for at least 30 years and therefore there is a need to ensure that the applicant does not have any plans for development within the areas proposed to be enhanced.

If planning permission is granted, local planning authorities are encouraged to use suggested paragraphs for Biodiversity Gain Information on the written decision notice which are available to download here: https://assets.publishing.service.gov.uk/media/663251d969098ded31fca800/BNG_Decision_Notice_Text.odt. The applicant should submit a biodiversity gain plan form2 along with supporting information once planning permission has been granted to demonstrate in more detail how the proposed biodiversity net gain will be delivered.

'Offsite' biodiversity gains are any BNG measures proposed outside of the red line boundary. The statutory Biodiversity Gain Plan (BGP) must contain the biodiversity gain site register reference number for any offsite units if these are used. BNG sites must be registered here: Register a biodiversity gain site - GOV.UK

Where offsite 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'), 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 a monitoring report;
- 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 72:

- (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 offsite 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, above a condition requiring biodiversity net gain to be delivered as set out in the planning application.

KCC Fire and Rescue

Comments received on 27th May:

Upon reviewing the plans on the Gravesham planning portal, I can confirm that it is in my opinion, that the emergency access requirements under the above act appear 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.

Health and Safety Executive

No comments received.

Port of London Authority

Comments received on 9th June:

We note that the application site is located predominately within Flood Zone 2 and partially within Flood Zone 3 along the northern boundary. 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. To reiterate comments made by the Environment Agency (EA), a preliminary risk assessment would be required for any breaking ground and this may lead to further investigation should contamination be discovered. Any facilities for the storage of oils, fuels or chemicals should also be contained to ensure that there is no risk for contamination; therefore, details of any necessary impermeable containment should be provided.

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, 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. The Transport Statement does not refer to the use of the River Thames. 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, there has been no reference to the provision of additional lighting around the site. The Preliminary Ecological Appraisal (PEA) has highlighted the impacts of artificial lighting on foraging and commuting behaviour of nocturnal mammals and it is recommended that any proposed new external lighting should be directed to where it is needed and light spillage (whether direct and/or indirect) should be avoided as far as practicable (paragraph 6.4.1). Full details of any external lighting to be erected within the application site both during the construction phase and any subsequent permanent external lighting, must therefore be provided.

National Grid

No comments received.

Neighbouring properties

396 surrounding properties were consulted, and a site notice was placed on 28th May 2025. 0 comments were received from members of the public. The final date to submit comments ended on 20.06.25.

Officer's Analysis

Proposal

The proposal is to create a pulp laydown area, and associated infrastructure. This is needed to replace the existing pulp laydown area, as the existing area, is subject to planning permission for creation of a green hydrogen facility, to support the business.

The area, would 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. It would include a new footpath connecting the north of the Kimberly Clark facility. The bales of wood pulp to be stored here arrive by the River Thames. The site is currently laid to lawn as can be seen below:



The current pulp laydown area is to the north of the site adjacent to the River Thames as can be seen below:



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 area is industrial in nature and is located within the Northfleet Embankment and Swanscombe Opportunity Area. There is a listed building approx. 240m away from the site (Northfleet Tower Lighthouse). The site is mostly in flood zone 2 but not in an area of significant risk.

Principle of Development

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.

Policy CS07 states that the Council will support the refurbishment and upgrading of existing industrial and commercial premises.

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.

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."

The proposed development and reasons for its relocation are supported by the above policies and therefore the principle of development is acceptable. The application therefore turns to be assessed against the policies below.

Design, Character and Appearance

Paragraph 135 of the National Planning Policy Framework 2024 states that developments will function well and add to the overall quality of the area, are visually strictive, layout and appropriate and effective landscaping and are sympathetic to local character.

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.

The development is well-suited to the industrial context of the site and factory. The proposed fencing and barriers are also characteristic of the area and will blend in well to their surroundings.

Neighbouring Amenity

The proposed pulp laydown area is over 350m from the nearest residential dwelling and therefore raises no concerns with regards to loss of outlook, privacy, sunlight or daylight. In terms of noise, the pulp is already loaded onto site, albeit a different part of the site, and therefore there will be no change.

The proposed development therefore accords with Policy CS19 of the Gravesham Core Strategy 2014 and paragraph 135f of the National Planning Policy Framework 2024 in relation to amenities.

Flood

Policy CS18 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) and a Flood Risk Management Plan (if required) to demonstrate that they are adequately defended and safe over their lifetime. Planning permission will be refused for schemes which do not pass the sequential and exception tests.

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.

As the site is situated within an area covered by Policy CS03 the sequential and exception tests have been undertaken and further assessments are not required. Notwithstanding this the application has been accompanied by a Flood Risk Assessment which states the proposed development and 'less vulnerable' and therefore considered appropriate in the flood zone. The relocation of the pulp laydown is due to the introduction of the Green Hydrogen Electrolyser to support the decarbonisation of Kimberly-Clarks' operations at Northfleet which weighs in support of the application.

Ecology and Biodiversity

Sufficient information relating to ecology has been submitted with the application. There is potential for badgers, breeding birds and foraging bats within the site and surrounding area however no further surveys are required. A condition is recommended that the precautionary mitigation detailed in section 6.4 of the report is included within the construction environment management plan. No lighting has been shown on the plans and therefore a condition is recommended that full details of any new lighting is provided prior to its installation.

Biodiversity Net Gain

Policy CS12 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."

Under the Environment Act 2021 and the Town and Country Planning Act 1990 (as amended), all planning applications for development (unless exempt) must deliver at least a 10% biodiversity net gain (BNG). Significant on-site gains, and all off-site gains will need to be secured for at least 30 years. This application falls under mandatory biodiversity net gain so that mandatory biodiversity net gain of 10% applies. Sufficient information has been provided with regards to BNG and the information shows that 10% can be achieved. It is noted that 10% BNG is also required for the Green Hydrogen Electrolyser application and both applications will need to demonstrate they can achieve 10%.

Subject to the above conditions the proposed development accords with the objectives of Policy CS12 of the Gravesham Core Strategy 2014 and paragraph 187 of the National Planning Policy Framework 2024.

Parking and Highways

Policy CS11 states that new developments should mitigate their impact on the highway and public transport networks as required.

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.

The submitted Transport Statement details the route to the site for construction traffic and indicates that the existing entrance is suitable and safe for the proposed movements. To ensure highway safety is upheld a Construction Environment Management Plan is submitted prior to the commencement of works.

Any Other Material Planning Considerations

Contamination

Phase 2 intrusive surveys are recommended to be undertaken and this can be controlled by conditions. A watching brief shall also be undertaken during construction in case any contamination issue is encountered.

Conclusion

The proposed pulp laydown area, subject to conditions, will have no detrimental impact on the surrounding character of the area, amenities, flood risk, contamination, ecology and highway safety and therefore accords with the above-mentioned policies and is recommended for approval.

Recommendation

Permit

(For detailed conditions and informatives, see draft Decision)

Case Officer:	Mrs Alison Webster	Team Leader:	Mrs Faye Walsh
Signed:		Signed:	
Dated:	25 September 2025	Dated:	01 October 2025