



## PLANNING STATEMENT

Roof mounted PV system,  
Kimberly Clark, Northfleet



Prepared by: CB  
Checked and approved by: TB  
Client: Zestec Asset Management LTD  
Date: May 2022



## PLANNING STATEMENT – INSTALLATION OF SOLAR PV SYSTEMS ON THE ROOF OF KIMBERLY CLARK WAREHOUSE, NORTHFLEET

### 1.0 Introduction

- 1.1 The following planning statement has been prepared by Urbana Town Planning Ltd on behalf of the applicant, Zestec Asset Management Limited, in support of a full planning application regarding the aforementioned development proposal.
- 1.2 The proposal seeks full planning permission for the installation of a PV System on the roof of the Kimberly Clark warehouse in Northfleet.
- 1.3 This statement describes the application site in its physical and planning context, before assessing the proposals against relevant national and local planning policy. Furthermore, it should be read in conjunction with the supporting plans and drawings and aims to establish the principle of the development to secure a positive decision from the Local Planning Authority (hereafter referred to as LPA).

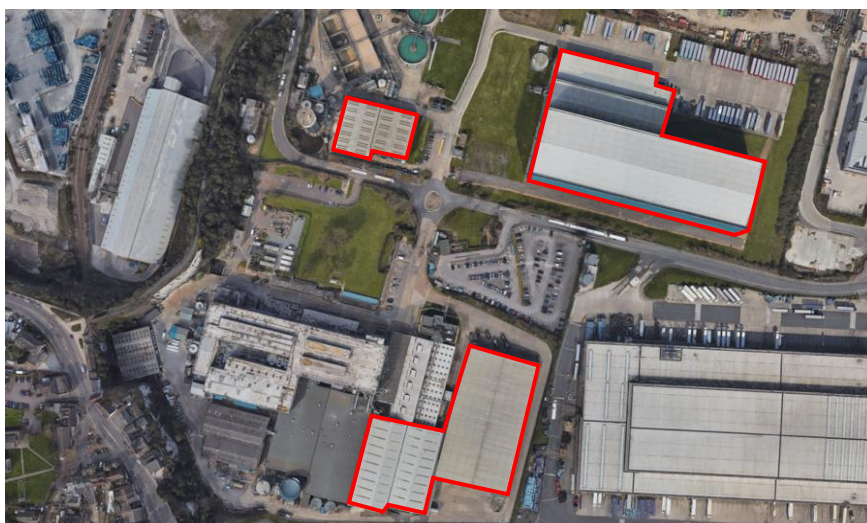


Figure 1: Site Location Plan

### 2.0 Site & Location

- 2.1 The Kimberly Clark site in Northfleet is a well-established manufacturing facility that specialises in producing disposable paper tissue products. Situated on the northern outskirts of Northfleet, the site enjoys a strategic location approximately 1 kilometre away from Gravesend, the nearest town centre. Notably, it benefits from its convenient positioning, being a mere 2.1 miles from the A2, a major highway that offers exceptional connectivity to London and its surrounding areas. This advantageous proximity to major road networks contributes to its accessibility and logistical efficiency.



### 3.0 Relevant Planning History

3.1 The Site benefits from extensive planning history and the following applications are felt to be of most relevance to the application site:

- **19990678**–Demolition of existing lean-to stores and erection of an attached two storey building on south elevation of existing PM3 building to provide a control room and upgrading of equipment within PM3 building. **Approved.**
- **20121045**: Erection of single storey extension to existing chemical building. **Approved.**
- **20120610**: Demolition of existing lean-to stores and erection of an attached two storey building on south elevation of existing PM3 building to provide a control room and upgrading of equipment within PM3 building. **Approved.**

### 4.0 Planning Policy Assessment

4.1 In determining the application, the most relevant planning policy documents include the following:

- National Planning Policy Framework (Revised July 2021)
- Gravesham Local Plan (Adopted 2014)

#### Accordance with National Planning Policy

4.2 Part 14 of the National Planning Policy Framework (NPPF) holds direct relevance to the generation of renewable energy. Specifically, Paragraph 152 emphasises the importance of the planning system in facilitating the transition towards a low carbon future amidst a changing climate. It highlights the need for shaping communities in a manner that actively contributes to significant reductions in greenhouse gas emissions, while concurrently supporting the development of renewable and low carbon energy sources and associated infrastructure. The planning system plays a pivotal role in promoting sustainable energy practices and mitigating the impacts of climate change, and it is deemed that as the proposed development adheres to these principles, the development should be viewed favourably by the LPA.

4.3 Paragraph 158 outlines that when LPAs determine planning applications for renewable and low-carbon development, they should not require applicants to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

4.4 Paragraph 158(b) of the NPPF 2021 states that when determining applications for such development, local planning authorities should approve the application if its impacts are (or can be) made acceptable. It is considered that the potential impacts of the proposed development are, or can be made acceptable in this specific location, given the careful site



selection which provides natural screening from nearby dwellings and highways as a result of the properties height.

- 4.5 Paragraph 158(b) of the NPPF encourages LPAs to approve renewable and low-carbon development proposals if the potential impacts associated with it are deemed acceptable or can be mitigated effectively. In the case of this proposal, it is determined that any perceived impacts are negligible and can be made acceptable. The strategic placement of the property and natural screening of the Site ensures the development would generate minimal disturbance to nearby properties. Furthermore, considering the existing industrial use of the property, the addition of a PV System would not cause any additional harm to the amenity of nearby properties.
- 4.6 The NPPF places emphasis on a presumption in favour of sustainable development, which serves as a fundamental principle in both plan-making and decision taking processes. Sustainable development, as defined by the NPPF, encompasses three key dimensions: economic, social, and environmental. It is firmly established that when proposals align with the principles of sustainable development: "For decision taking this means approving development proposals that accord with the development plan without delay."

#### Accordance with Local Planning Policy

- 4.7 This Planning Statement considers the proposed development using the strategic policies outlined in the Gravesham Local Plan, which provide a long-term vision and objectives for the area.
- 4.8 Policy CS01 establishes the Council's approach when evaluating development proposals, emphasising that the Council will take a positive approach that aligns with the presumption in favour of sustainable development promoted by the National Planning Policy Framework. The policy underscores the Council's proactive stance in collaborating with applicants to identify viable solutions that enable the approval of proposals whenever feasible, and to secure development that improves the economic, social and environmental conditions in the area. In the case of this proposal, it is demonstrated that the development wholly represents sustainable development and therefore the LPA should be supportive of the application.
- 4.9 Policy CS02 prioritises sustainable development in urban areas, and the Northfleet Mill (South Site) is located within an established business park, which has excellent connectivity to nearby road networks. The policy aims to ensure that development in such areas aligns with sustainability principles and does not adversely impact the environment or local communities. It is demonstrated throughout the report that the proposed development would conform with the policy in this regard.
- 4.10 Policy CS02 places emphasis on prioritising sustainable development within urban areas, making it particularly relevant to the Northfleet Mill (South Site) which is situated within an established business park and has excellent connectivity to nearby road networks. The policy's objective is to ensure that development adheres to sustainability principles and does not have adverse effects on the environment or local communities. It is demonstrated throughout this document that the proposed development will have significant wider public benefits and aligns with sustainable development and therefore complies with policy.



- 4.11 Policy CS18 outlines the council's strategy for reducing the overall carbon footprint of the Borough. Of particular importance is the Core Strategy's endorsement of initiatives aimed at reducing carbon emissions including the retrofitting of existing homes and businesses, including local initiatives based on carbon off-setting via allowable solution.
- 4.12 Policy CS18 outlines the Council's strategy for reducing the carbon footprint of the Borough. The Core Strategy places emphasis on endorsing initiatives designed to reduce carbon emissions, with a particular focus on retrofitting existing homes and businesses. Notably, the policy recognises the value of local initiatives that incorporate carbon offsetting via permissible solutions. The Policy demonstrates the Council's commitment to supporting businesses in their pursuit of initiatives aimed at offsetting their carbon emissions.
- 4.13 Policy CS19 of the Core Strategy, in accordance with paragraph 130 of the NPPF, emphasises the importance of well-designed development that respects the character and appearance of the surrounding area. Considering the context of the proposed development Site (existing business park), it is considered that the proposal respects the immediate setting, will not cause any harm to the character or appearance of the locale and will integrate with the surroundings.
- 4.14 Kent County Council's (hereafter referred to as KCC) Solar Policy Position Statement is directly relevant to proposals pertaining large-scale solar arrays. The statement is supportive in principle to the installation of renewable and low carbon energy generation technologies. The report explicitly states that the preference of KCC is to support solar arrays mounted on existing roofs or integrated into new roofs/building. It is clear that the proposed development conforms with the postilion of KCC.
- 4.15 KCC's "Solar Policy Position Statement", holds direct relevance to proposals involving large-scale solar arrays. The statement expresses the Council's supportive stance towards the installation of renewable and low carbon energy generation technologies. Notably, the report explicitly highlights their preference in supporting solar arrays that are mounted on existing roofs or integrated into new roofs/buildings. It is evident that the proposed development aligns closely with the preferences of KCC, as it embraces the recommended approach by integrating the solar arrays onto the existing structures.
- 4.16 In June 2019, this Council declared that a climate emergency was ensuing and signified its firm commitment to achieving Carbon Neutral status. The proposed development will undoubtedly contribute towards attaining Carbon Neutral status, and therefore fully aligns with the Council's ambitions.

## 5.0 Proposal

- 5.1 The following section will demonstrate the proposal's compliance with policy, reinforcing its acceptability and warranting a favourable view from the LPA. Furthermore, this section will highlight the proposals sustainability credentials and the contribution it will make towards sustainable development.



- 5.2 It should be noted that as of 6<sup>th</sup> April 2012, the installation of PV systems onto commercial, industrial and agricultural flat roof spaces was made achievable via Permitted Development Rights (PDR) and since then it has not been necessary to seek full planning permission for this kind of development. However, paragraph J.3 of the of the General Permitted Development Order (Town and Country Planning, England Statutory Instrument No.596) states that PDR are removed in all instances where the proposed PV system will generate over 1 megawatt of energy. In this instance a full planning application is required as the proposed scheme generates energy over the 1-megawatt threshold.
- 5.3 Nevertheless, it is contested that on the basis that the installation of PV systems on commercial / industrial roof space is a PDR for smaller projects, this should hold a good deal of persuasive weight in favour of this application being approved as the principle of this type of development is already established to be acceptable. Because of this, we maintain that securing permission for this proposal should be without major issue and as routine as possible.

#### *Economic and Social*

- 5.4 Beginning with the social benefits of the scheme, the scheme will contribute towards the stimulation of economic activity in the locale via the attraction of a workforce who will spend time and money in the area during the installation of the PV system. Though by far one of the more minimal benefits of this proposal, it will nonetheless benefit the local economy by boosting sales of nearby food vendors which serve the existing workforce of the area providing the associated social and economic benefits for the duration of the scheme's installation period.
- 5.5 From an extremely localised scale to a national and a global scale, there is tangible social benefit which will be delivered by this scheme which should be recognised by the LPA. Naturally, the scale of Kimberly Clark's global operations means that they as a company represent a large contributor of global emissions. This scheme, though small in scale, represents a commitment from Kimberly Clark, one of the largest companies operating in the UK, towards using its commercial warehouse buildings as an opportunity to produce clean, renewable energy to power their operations and dramatically reduce reliance on energy from national grid.
- 5.6 It is universally accepted that the climate crisis affects the poorest in society, again, both nationally and internationally, disproportionately on account of this section of society's lack of financial resilience against a reduction in the predictability of weather patterns and devastating extreme weather events. Therefore, a proposal such as this solely intended to increase the availability and ultimately reduce the cost of green energy, should be understood as implementing key infrastructure allowing net-sustainability goals to be met in the process, should be viewed in an extremely favourable light from the LPA. Furthermore, that this move comes from a company of Kimberly Clarks global scale should be recognised as evidence of a crucial step towards large polluters achieving sustainable carbon emissions and welcomed and enabled by the LPA.
- 5.7 It is also considered that the LPA should look favourably upon proposals that foster the production of renewable energy that is fed into the National Grid as the cost-of-living crisis continues to escalate in the UK. It is estimated that 7 million households in the UK will suffer



from fuel poverty in the 2022-2023 winter period. The applicant expects that this proposal, which will enable the generation of renewable sources of additional energy into the national grid, will be actively supported as a way of diversifying the reliance on non-renewable and polluting forms of energy whilst also contributing towards to the overall amount of energy in the grid and a more sustainable future. The proposal presented will ultimately contribute towards helping the Government and LPA achieve net-sustainability goals and reduce the UKs over reliance on sources of non-renewable energy.

- 5.8 Paragraph 81 of the NPPF emphasises the need for planning policies and decisions to help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

#### *Environmental*

- 5.9 As discussed, this proposal to install a PV system should be recognised as a development explicitly intended to reduce the net emissions impact of Kimberly Clark as a company and increase the percentage of renewable energy in the national grid. The justification of this proposal rests heavily on the simple proposition that installing a PV system will have a significant positive environmental impact, and that planning decisions should always be taken in favour of applications which offer such an undeniable environmental benefit without any discernible negative impact on social amenity. Planning policy at both a local and national level is explicit in the support LPAs should show for proposals aimed at reducing carbon emissions.
- 5.10 A Landscape and Visual Assessment (LVA) has been undertaken for the purposes of demonstrating the negligible impact the proposed development would have to visual amenity. The proposed site is not located within, adjacent to or in close proximity to any landscape designations or any areas or features of high landscape or scenic value. It is expected that landscape effects arising from the proposed development are very likely to be limited due to the site being well screened from neighbouring properties and nearby public highways as a result of the height of the warehouse.
- 5.11 The clean energy that will be produced by the PV system will be used directly by Kimberly Clark and given the sheer amount of energy that will be generated through this proposal, the development will reduce Kimberly Clark's reliance on polluting means of energy generation for their operational activity. By leveraging renewable energy, Kimberly Clark can reduce its carbon footprint and contribute to a more sustainable future.
- 5.12 As mentioned previously, the fact that PV systems of smaller sizes are Permitted Development (PD) only further reinforces the notion that the installation of such systems are deemed by the Government to be absolutely key to achieving a sustainable national energy mix. The policy which requires planning permission for all proposed developments that will have an output of over 1 megawatt is intended to mitigate the risk of any potential negative impact that a large-scale PV system could have on local resident amenity, visual amenity and the potential for

danger caused by glint and glare if situated in eyeline of high-risk activities such as operators of heavy machinery or transport infrastructure. This Planning Statement and the supporting documentation which will be submitted as part of this application is intended evidence that there simply isn't the potential for any of these risks to offset the value of the significant environmental benefits a PV system of this size will have in diversifying and greening the UK's energy mix.

- 5.13 The above discussion has demonstrated that the development scheme fulfils the underlying sustainable development requirements in terms of its economic, social and environmental sustainability at a policy level. It is considered that proposals here will have an entirely positive impact. It is evident that the proposals represent sustainable development and, in accordance with the compliance with other policies as set out below, should be viewed positively by the LPA.

## 6.0 Principle of Development

- 6.1 As already established, one of the most important factors is that the site and proposals represent sustainable development in all three of the elements as defined by the NPPF. This helps to demonstrate that the proposals represent suitable development and that the benefits of this from a social, economic and environmental perspective are significant. The following paragraphs draw out particularly relevant national and local planning policy as a means of evidencing the acceptability of this proposal.
- 6.2 Paragraph 153 of the NPPF states that local planning authorities should adopt proactive strategies to mitigating and adapting to climate change, which is in line with the objectives and provisions of the Climate Change Act (2008). At the core of the 2008 Climate Change Act is a duty for the government (and by proxy LPAs) "to ensure that the net UK carbon account for the year 2050 is at least 80 per cent lower than the 1990 baseline". As has been outlined in the above section on environmental sustainability, this proposal is a directly tackling this goal. Undeniably, this proposal will have a wholly positive impact on carbon emissions and directly contribute to reducing the carbon footprint of the UK in line with the above policy.
- 6.3 Paragraph 155 of the NPPF states that LPAs should look to "identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers". Again, that this proposal achieves these goals has been outlined in detail in previous sections of this Planning Statement. Clearly, the environmental benefits of this proposal are largely self-evident. However, this Planning Statement has intended to evidence the truly sustainable credentials of this proposal drawing attention to social and economic sustainability too, standing this scheme in good stead against all three indicators for sustainability outlined within the NPPF.
- 6.4 As mentioned, this proposal to install a PV system on the roof of a distribution warehouse represents an extremely efficient use of otherwise completely disused space. Paragraph 122 of the NPPF states that "planning policies and decisions should support development that makes efficient use of land". In this instance, it is clear that using such a large roof space for



the generation of significant quantities of green energy on a daily basis represents a huge leap in the efficiency of use of this space.

- 6.5 Paragraph 124 goes on to say that the “the desirability of maintaining an area’s prevailing character and setting” should be taken into account when considering planning applications. As has been established, the warehouse in question is located in a highly industrialised and urban context in the middle of a large area designated for business use. On top of this, as mentioned, the roof of this warehouse is over 20m tall meaning that the introduction of a large PV system will go almost completely unnoticed by anyone from a ground level. It is therefore strongly asserted that this proposal should be accepted on the basis that it poses to introduce hugely sustainable green energy infrastructure at no discernible cost to local amenity or to the local urban character of the area.

## 7.0 Amenity

- 7.1 On the issue of local amenity, the positioning of the PV systems on a flat roof at a height of over 20m ensures that the PV system itself will be largely obscured from public view. This ultimately means that there is no risk of solar glare impacting nearby residents or users of nearby infrastructure. As mentioned, the warehouses are located on a large industrial and distribution estate toward the edge of an urban area. Bordering the site to the north is the Thames and to the south the residential area of Northfleet. Of particular relevance, the residential area to the south and west of the site is covered by The Hill Conservation Area (CA) as shown below.

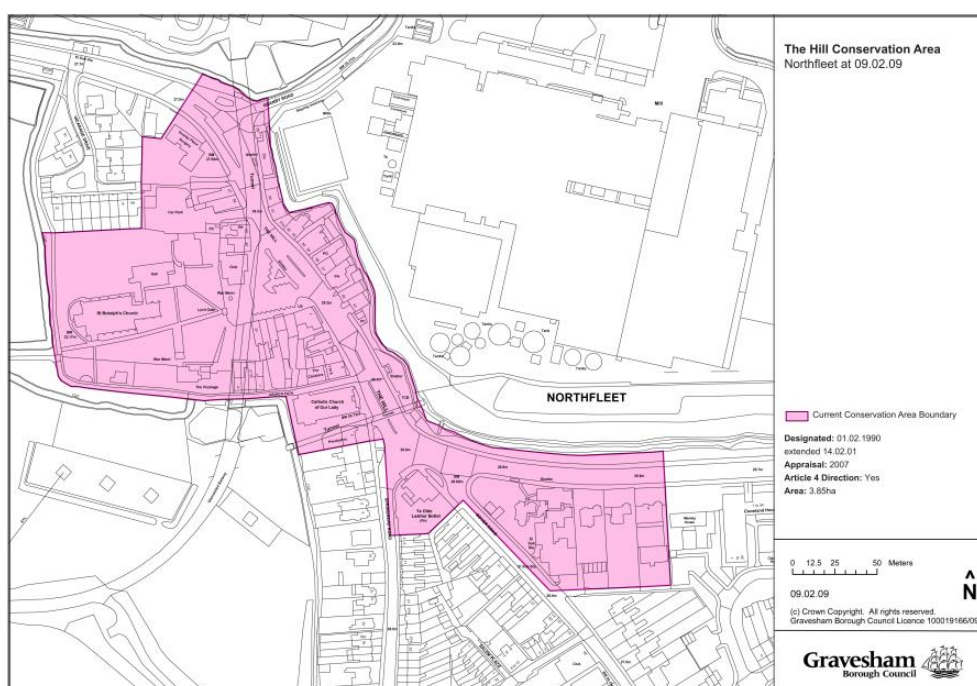


Figure 2: The Hill Conservation Area

- 7.2 Whilst the presence of the CA does create a more sensitive context which needs to be considered through any full planning application, it is considered that any negative impact on the CA caused by the development will be limited due to the physical geography and existing industrial nature of the site. The Kimberly Clark plant lays within a sunken basin beneath a large cliff face which physically separates The Hill CA and the industrial estate below.



*Figure 3: Street View from The Hill Conservation Area*

- 7.3 The above image is taken from Google Streetview and shows the view from outside Ye Olde Leather Bottle public house within the CA looking directly at the site. It is intended to show that the existing interaction between the industrial complex which the site sits within and The Hill is softened and mitigated almost entirely by the natural features which form a natural border between the two distinctly different character areas.
- 7.4 To evidence this, this application is supported a suite of supporting reports and surveys that the applicant has confirmed with the LPA would be sufficient to meet the LPA's validation requirements and satisfy any concerns that may arise through the proximity of the site to The Hill CA.
- 7.5 The Council has confirmed that a Heritage Statement is unlikely to be necessary for the application, thus reinforcing the perspective that the proposal would not result in any harm to the nearby CA.
- 7.6 Furthermore, the Glint & Glare Assessment submitted alongside this application demonstrates that the proposed development poses a low risk towards the assessed/considered light sensitive receptors.
- 7.7 With the input from the supporting project team, it is considered to have been categorically demonstrated that there will be an entirely negligible impact resultant from the implementation of the proposed development on the surrounding urban environment.
- 7.8 More broadly, it is considered that there is very little potential for the installation of a roof mounted PV system as is proposed here, despite its size, to create a negative impact on the surrounding area of the area. That all of this is the case removes one major cause for objection for large scale green infrastructure proposals such as this. With the complete lack of cause for

concern of this PV system posing a threat to local amenity or damage to the aesthetic qualities of the area, there is really no reason that this proposal should cause issue from a policy perspective.

## 8.0 Design

- 8.1 The technical information which accompanies this Planning Statement details the design of the scheme, namely, the regular lay out of the PV system on the roof and the cable drop which runs down the side of the building to the inverter which sits at the base of the building. This detail outlines the aesthetic considerations which have been undertaken to ensure that the associated plant apparatus which will sit on site has a minimal visual impact. Namely, the cable which will run down the side of the building from the PV panels on the roof to the inverter on the ground (cable drop) will be encased in a cable tray and the caging around the inverter will be designed to match the fencing around the substation.
- 8.2 As mentioned, the specific detail of these arrangements is outlined in accompanying technical notes. For the purposes of this Planning Statement, however, it is sufficient to draw attention to the fact that this detail has been considered to state that the design and aesthetic quality of this PV system has been adequately dealt and is completely in-keeping with the surrounding context of the industrial park.
- 8.3 As has been discussed, consideration of the impacts of glint and glare currently represent one of the main concerns for proposals of PV systems. Currently, there is a recognised 'knowledge gap' amongst the industry as to the impact of glint and glare, particularly on transport infrastructure. As such, the current planning guidance states that a 'Glint and Glare' assessment is necessary to detail the potential impact on all proposed PV systems to be installed within close proximity to Air Traffic Control towers and rail infrastructure.
- 8.4 Subsequently, the applicant has submitted a Glint & Glare assessment as part of this application to demonstrate the impact of the PV System to sensitive receptors. It is evidenced within this report that the proposed development presents a low risk to the assessed light sensitive receptors, including dwellings, road users, railways, and aviation.
- 8.5 In light of the above and given the nature of the proposed development, it has been demonstrated that the application is acceptable in terms of design considerations.

## 9.0 Flooding

- 9.1 The development site is wholly located with Flood Zone 2, which are areas classified as having an annual probability of river flooding between 1.0% and 0.1% and annual probability of sea flooding between 0.5% and 0.1%. It is asserted that due to the nature of this proposal not resulting in the removal of permeable surfaces for additional impermeable surfaces, there are



no implications for drainage and/or flood risk. A comprehensive Flood Risk Assessment accompanies the submission and concludes that the development would not increase flooding elsewhere and would be operated with minimal risk from flooding.

## **10.0 Conclusions**

- 10.1 As has been established, this proposal would comply with Permitted Development Rights if it wasn't for the sheer scale of the development in question. The proposal represents a wholly sustainable development and ties into the core themes of sustainability which runs through both local and national planning policy.
- 10.2 It is also demonstrated that the principle of the proposals is acceptable and that they completely align with national and local planning policy relating to sustainable development and the relevant goals set out within policy. Through the supply of extra clean energy into the national grid, this proposal will directly contribute towards achieving a more sustainable energy mix for the UK and the Government's commitment to achieve net zero emissions by 2050. On top of this, this development is able to achieve this without any negative impact on local resident or visual amenity.
- 10.3 As a result of this, it is considered that it has been proven that the application complies with all relevant national and local policy, and it is therefore respectfully requested that the application is approved without delay.

