

PLANNING STATEMENT

Siting of waste compaction system

Gravesham Borough Council

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Siting of waste compaction system

Leading Edge Labels, Units H1 to H4

Imperial business estate, East Mill, Gravesend DA11 0DP

Leading Edge Labels

November 2021

YOUR REF:

OUR REF: M21/0811.01-RPT

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Introduction

Section 1

- 1.1 This Planning & Design statement has been prepared by **Tetlow King Planning** on behalf of **Leading Edge Labels** to accompany the planning application for an additional waste compaction system.
- 1.2 This statement provides the background to the proposals, together with a description of the site and surroundings. The Statement demonstrates the planning merits of the proposals, having regard to relevant National and Local Planning Policy and other important material considerations upon which it is considered this application should be determined.
- 1.3 By way of background, the applicant is a long-term local employer that has been recognised over many years for its business. This includes the following awards:
- Gravesham Business Awards – Large Business of the Year 2019;
 - Kent Company of the Year, 2015
- 1.4 The company have a clear sustainability policy outlined on their company website which sets out the following (source: <https://leadingedgelabels.co.uk/sustainability-policy/>)

Leading Edge – a ‘Green’ business

Leading Edge Labels and Packaging recognises that its activities have an environmental implication in both the long and short term; therefore the business has set itself objectives moving forward to address sustainability and environmental concerns. The company is continually working to:

- Aim to lessen environmental damage and increase where possible the opportunities for environmental enhancement*
- Consider the environmental impact as a vital part of the decision making process*
- Encourage personal effort on the part of all employees and sub-contractors to reduce or prevent environmental damage and to act as a good neighbour to those affected by our activities*
- Provide and exhibit this policy and such written instructions as are necessary to aid its implementation*
- Co-operate with others to improve environmental conditions.*

The areas where we believe Leading Edge must consider its impact on the environment are as follows:

Waste Products

As a manufacturing process we unfortunately operate internal waste. While we work continuously to reduce this waste it is a by product of the printing process.

What we do with this waste is important for the environment to ensure that it doesn't end up in landfill.

We separate waste streams into cardboard, PE, PP, PET streams and these are recycled wherever possible. Any remaining waste which cannot be separated is used for incineration for energy recovery.

***ZERO WASTE GOES TO LANDFILL*.**

Energy usage

The primary energy source used to run our factories is electricity. This provides a clean energy source with the result that the CO2 emissions from our factories are very low. In the UK 29% of electricity is now generated from renewable sources (wind and solar) and 24.5% being generated from Nuclear which again results in very low CO2 emissions.

The only fossil fuel used in our factories is gas, which is used during the winter months to heat the offices and factories.

In addition we have introduced new energy lighting and movement light sensors in all our offices and factory areas resulting in a 67% energy consumption saving on lighting, equal to 28.7 tonnes of CO2.

We introduced a campaign to switch off any excess UV lamps on the printing presses when running a lower number of colours. Each lamp is 12Kw, equivalent to 300 normal light bulbs, so this policy saves a lot of energy.

We run a Leading Edge 'switch off' campaign – all staff to switch off lights/computer monitors/wall switches etc. We intend to invest in Solar Power during 2019 so that we can supply some of our own electricity usage.

1.5 This Planning Statement is set out in six sections:

- Section 2 sets out the context of the site and its surroundings;
- Section 3 sets out the details of the proposals;
- Section 4 sets out the planning policy context and explores other material considerations;

- Section 5 sets out the planning justification for the application cross referencing the proposals against the planning policy context and other material considerations; and
- Section 6 provides a summary and concludes that the proposals are supported by planning policy, therefore justifying the application should be approved.

Site & Surroundings

Section 2

Accessibility

- 2.1 The application site is located on the Imperial Business estate at the junction of Clifton Marine Parade and Thames Way.

Site Characteristics

- 2.2 The site is located within an existing business park and consists of typical industrial units backing onto Clifton Marine Parade with parking located to the east. There is an existing waste extraction system in the car park (that area identified in blue on the aerial image below)



Planning history

- 2.3 The only relevant planning history on the application site is from 2004 (ref: 2004/0725) where a waste extraction system was approved in the car park to the east of the main units.

Development Proposals

Section 3

Waste compaction system

- 3.1 The proposal is to provide an additional waste compactor unit to sit alongside the existing unit provided pursuant to the 2004 application. The provision of this unit will enable the applicants to increase their on-site recycling from 7% to 42%, a significant improvement in recycling standards for the on-site operation and further reducing cart-away of waste materials.

Planning Policy Framework

Section 4

- 4.1 Statutory guidance and development plan policies have been important considerations in the preparation of the proposal and details of the relevant guidance against which the application falls to be considered are set out below. The implications of these policies and other material considerations are addressed in section 5 of this statement, which sets out our planning case.

Development Plan Policy

- 4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.3 The Development Plan for the application site consists of the Gravesham Local Plan Core Strategy (2014) and the Local Plan 1st Review (1994)

Gravesham Local Plan Core Strategy (2014)

- 4.4 The Core Strategy (hereafter LPCS) was adopted in 2014 and sets out the Council's strategic policies and proposals for the development and use of land within the Borough up to the period of March 2028.
- 4.5 The following policies are relevant in the context of this proposal and are considered in further detail in section 5 of this statement:

Policy CS01 Sustainable Development	This policy merely reaffirms the application of the approach to sustainable development as set out in the Framework.
Policy CS18 Climate Change	This policy sets out several issues and procedures that developments need to address and confirm to reduce the impacts of climate change. The Council will require the use of Sustainable Urban Drainage Systems on all developments where technically and financially feasible
Policy CS19 Development and Design Principles	This states that new development will be visually attractive, fit for purpose and locally distinctive. It also states that development should conserve and enhance the character of the local built, historic, and natural environments, integrate well with the surrounding local area, and meet anti-crime standards.

- 4.6 In accordance with the provisions of the Framework, a strategic review of the CS was undertaken in September 2019.

- 4.7 The review confirmed that policy CS02 would require modification to reflect the objectively assessed development needs noting that to review the development strategy and green belt boundaries requires assessment through the plan making process.
- 4.8 The review considered that although policy CS12 was slightly out of conformity with the Framework in that it now requires net gains in biodiversity there was no requirement to modify the policy as the Framework is a material consideration.

Gravesham Local Plan 1st Review (1994)

- 4.9 The Local Plan 1st Review (LP) was adopted in 1994 and many of its policies were saved until subsequently superseded by the LPCS. There are no relevant policies in the Local Plan relative to this application.

Material Considerations

National Planning Policy Framework

- 4.10 In July 2021, the Government published the revised National Planning Policy Framework (the 'Framework') which sets out its objectives for securing sustainable economic growth.

Presumption in favour of sustainable development

- 4.11 At the heart of the revised Framework is a presumption in favour of sustainable development, encompassing social, economic, and environmental roles. The approach to sustainable development involves making the necessary decisions now to realise the vision of stimulating economic growth, maximising wellbeing, and protecting our environment, without negatively impacting on the ability of future generations to do the same. Paragraph 8 of the Framework states that under this approach, planning is expected to deliver:
- a strong, flexible, and sustainable economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure (Economic role);
 - protection and enhancement of our natural, built, and historic environment, prudent use of natural resources and actions to mitigate and adapt to climate change, including moving to a low carbon economy (Environmental role);

- strong, vibrant, and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality-built environment, with accessible local services, that reflects community needs and supports well-being (Social role).
- 4.12 Paragraph 11 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise. Footnote 6 confirms that designated heritage assets are one of the criteria that may provide a clear reason to refuse a development.
- 4.13 Paragraph 12 further states that developments that accord with an up-to-date local plan should be approved and those that conflict should be refused unless material considerations indicate otherwise.
- 4.14 Paragraph 38 reaffirms that decision makers should seek to approve applications for sustainable development wherever possible.

Planning Assessment

Section 5

- 5.1 This section of the statement provides a justification for the proposal having regard to the relevant planning policy background, the character of the local area and the site's planning history.

Principle of Development

- 5.2 The application site is within an identified employment zone and the proposals do not result in the loss of any employment provision. Accordingly, there is no objection in principle to the proposals given that they do not impact on the employment provision and indeed assist in improved longer term operational matters for the applicant on this site.

Design and Layout

- 5.3 In respect of the ground floor layout and the siting of the new waste compactor system the most appropriate location has been considered as being immediately to the south of the existing waste extraction system. This is because the siting will not affect the parking layout and is also the most appropriate location for the business operation being close to one of the main sets of warehouse doors for the removal of waste material from the operation of the units.

Amenity impacts

- 5.4 Due to the location of the proposed waste compaction system, it will not be immediately visible from outside of the site. Although there is a footpath along the southern boundary following Thames Way the existing landscape planting and fencing will largely screen any public views north towards the proposed site. Any glimpsed views will not be materially altered from the current view to see the existing waste extraction system.

Noise considerations

- 5.5 Given the location of the site there are no residential properties that would be impacted because of the operation of the proposed new facility on site. It should also be noted that the current system that has operated arising from the 2004 application has been

operating without concern or complaint and it is therefore considered that the additional unit will not cause any additional concerns.

Highway impacts

- 5.6 The provision of the waste compactor system immediately to the south of the existing waste extraction system does not result in the loss of car parking spaces on site that would cause material harm.
- 5.7 It is considered that the proposals would result in the loss of a single parking space arising from the siting of the new unit. The existing parking on site will not be affected by the siting of the new unit and it is proposed that the existing barriers surrounding the current waste extraction system are to be relocated to the south of the proposed new unit to provide clear separation between the parking and the unit.

Climate change impacts

- 5.8 As set out in the development proposals section, the provision of this additional waste compaction system will enable the amount of waste to be recycled on site to increase to 40%.
- 5.9 Both matters weigh heavily in support of the application proposals and would demonstrably outweigh any minor design impacts that may arise from the proposals.

Conclusion

Section 6

- 6.1 The proposals do not result in any conflict with planning policy at either the national or local levels. The introduction of an existing waste compaction system will further enhance the renewable credentials of the applicant without detriment to any neighbouring occupiers.
- 6.2 It is therefore requested that planning permission be approved.