ENVIRONMENT & TRANSPORT CABINET COMMITTED

Wednesday, 28th November, 2018

10.00 am

Council Chamber - Sessions House





AGENDA

ENVIRONMENT & TRANSPORT CABINET COMMITTEE

Wednesday, 28 November 2018 at 10.00 am Ask for: Georgina Little Council Chamber - Sessions House Telephone: 03000 414043

Tea/Coffee will be available 15 minutes before the start of the meeting

Membership (16)

Conservative (12): Mr M A C Balfour (Chairman), Mr M D Payne (Vice-Chairman),

Mr A Booth, Mr T Bond, Mr A Cook, Mr N J Collor, Mr S Holden, Mr A R Hills, Mr R C Love, Mr P J Messenger, Mr J M Ozog and

Mr H Rayner

Liberal Democrat (2): Mr I S Chittenden and Mr A J Hook

Labour (1) Mr B H Lewis

Independents (1) Mr M E Whybrow

Webcasting Notice

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UNRESTRICTED ITEMS

(During these items the meeting is likely to be open to the public)

- 1 Introduction/Webcast announcement
- 2 Apologies and Substitutes

To receive apologies for absence and notification of any substitutes present

3 Declarations of Interest by Members in items on the Agenda

To receive any declarations of interest made by Members in relation to any matter on the agenda. Members are reminded to specify the agenda item number to which it refers and the nature of the interest being declared.

4 Minutes of the meeting held on 20 September 2018 (Pages 7 - 16)

To consider and approve the minutes as a correct record.

5 Dates of future meetings for 2019/2020

The Cabinet Committee is asked to note that the following dates have been reserved for its meetings in 2019/20:

Friday 24 May 2019 Tuesday 16 July 2019 Thursday 10 October 2019 Friday 29 November 2019 Friday 24 January 2020 Tuesday 24 March 2020 Friday 15 May 2020

All meetings will take place at County Hall, Maidstone, and will commence at 10:00 am.

6 Verbal Update

To note the written/verbal update from the Cabinet Member for Community & Regulatory Services and the Cabinet Member for Planning, Highways, Transport and Waste.

- 7 Lower Thames Crossing (Presentation)
- 8 Performance Dashboard (Pages 17 26)

To note the report.

9 Update on Preparedness to Respond to Brexit - Transport, Borders and Emergency Planning (Pages 27 - 32)

To note and discuss the planning and preparedness of services set out in the report.

10 Kent Minerals and Waste Local Plan 2013 - 2030 Early Partial Review, Kent Mineral Sites Plan and revised Local Development Scheme (Pages 33 - 626)

The Environment and Transport Cabinet Committee is asked to:

- (i) consider and endorse, or make recommendations to the Cabinet Member responsible for the Minerals and Waste Local Plan on the proposed:
- (a) Pre-submission Draft of the Kent Mineral Sites Plan;
- (b) Pre- submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan; and,
- (c) the updated Local Development Scheme (revised timetable) to reflect changes to the programme and timetable concerning preparation of the Local Plan work.
- (ii) note that the decision to approve the Pre-submission Drafts Plans for submission to the Secretary of State for independent examination is a matter for County Council:

- (iii) request the County Council to:
- (c) Approve and publish the Pre-Submission Drafts of the Kent Mineral Sites Plan and the Early Partial Review of the Kent Minerals and Waste Local Plan for a statutory period of representation and to submit the Draft Plans to the Secretary of State for independent examination; and
- (d) delegate powers to the Corporate Director for Growth, Environment & Transport to approve any non-material changes to the Mineral Sites Plan and Early Partial Review of the Kent Minerals and Waste Local Plan in consultation with the Deputy Leader prior to their publication and during their examination.
- 11 Kent & Medway Energy & Low Emissions Strategy Emerging evidence and priorities (Pages 627 634)

To consider and make recommendations to the Cabinet Member for Planning, Highways, Transport and Waste as to the:

- 1. Progress in and proposed timelines for the development of the Strategy; and
- 2. The Themes and Project Models proposed in the TRI-LEP Energy Strategy outlined in Section 3, and their relevance to the Kent and Medway Strategy.
- 12 Key Street and Grovehurst Road Junction Improvements, A249 (Pages 635 654)

 To note the progress made to date on the preparation of the full business case for submission to the Ministry of Housing, Communities and Local Government as part of the Housing Infrastructure Fund (HIF) bid process.
- 13 18/00064 A28 Thanet Road Asset Renewal and Strengthening Works (Pages 655 668)

To consider and endorse, or make recommendations to the Cabinet Member for Planning, Highways, Transport & Waste, on:

- (i) the proposed works to renew and strengthen the A28 road surface between Birchington and Margate; and
- (ii) the delegation to the Corporate Director of Growth, Environment & Transport, under the Officer Scheme of Delegations, to take further or other decisions as may be appropriate to deliver the scheme in accordance with these recommendations
- 14 18/00007 Revision of the Rights of Way Improvement Plan (Pages 669 762)
 To consider and endorse or make recommendations to the Cabinet Member for Community and Regulatory Services on the proposed decision to adopt and publish
- 15 Bus Summit Big Conversation Update (Pages 763 772)

 To note the report.

the Rights of Way Improvement Plan 2018.

- 16 Work Programme 2019-20 (Pages 773 778)

 The Cabinet Committee is asked to consider and agree its Work Programme for 2019/20.
- 17 Contract Management/ Procurement Public Rights of Way Vegetation Clearance (Pages 779 784)

To note and comment on the contents of this report.

Benjamin Watts General Counsel 03000 416814

Tuesday, 20 November 2018

Please note that any background documents referred to in the accompanying papers maybe inspected by arrangement with the officer responsible for preparing the relevant report.

KENT COUNTY COUNCIL

ENVIRONMENT & TRANSPORT CABINET COMMITTEE

MINUTES of a meeting of the Environment & Transport Cabinet Committee held in the Council Chamber - Sessions House on Thursday, 20 September 2018.

PRESENT: Mr M D Payne (Vice-Chairman), Mr M A C Balfour, Mr A Booth, Mr N J Collor, Mr S Holden, Mr A R Hills, Mr R C Love, Mr P J Messenger, Mr I S Chittenden, Mr A J Hook, Mr B H Lewis, Mr M E Whybrow and Mr H Rayner

ALSO PRESENT: Mr M Hill, OBE (Cabinet Member for Community and Regulatory Services) and Mr M Whiting (Cabinet Member for Planning, Highways, Transport and Waste).

IN ATTENDANCE: Mrs B Cooper (Corporate Director of Growth, Environment and Transport), Simon Jones (Director of Highways, Transportation and Waste), Katie Stewart (Director of Environment, Planning and Enforcement) and Georgina Little (Democratic Services Officer).

UNRESTRICTED ITEMS

111. Membership

(Item 2)

- 1. Mr Payne welcomed Mr M Balfour and Mr H Rayner as new Members to the committee
- 2. RESOLVED that the membership change be noted.

112. Apologies and Substitutes

(Item 3)

Apologies were received from Mr T Bond and Mr A Cook.

113. Election of Chairman

(Item 4)

- 1. Mr M Payne proposed, seconded by Mr A Hills that Mr M Balfour was elected as Chairman of this Cabinet Committee.
- 2. RESOLVED that Mr M Balfour was elected Chairman to the Environment and Transport Cabinet Committee.

114. Declarations of Interest by Members in items on the Agenda (*Item 5*)

Mr B Lewis declared an interest as an employee of Lake Market Research which was used as part of the bus consultation.

115. Minutes of the meeting held on 13 July 2018 (*Item 6*)

RESOLVED that the minutes of the meeting held on 13th July 2018 are a correct record and that they be signed by the Chairman.

116. Verbal Update

(Item 7)

- 1. Mr M Hill (Cabinet Member for Community and Regulatory Services) informed the Committee that the Natural Ways to Wellbeing was a project run by the Countryside Partnership and Mind to help those with Mental Health problems engage with nature using elements of ecology. Mr Hill appreciated the level of support shown by the Dartford Members through their contribution of Member grants.
- 2. Mr Hill said that the Ash Dieback art project, run by the Kent Downs Area of Outstanding Natural Beauty (AONB) was launched on 14th September. The project aimed to raise awareness of the urgent cultural response required to tackle the demise of the ash trees. Mr Hill informed Members that it was expected that the Ash tree population would decline by 98%. Research was being carried out to try and develop a disease resistant strain and this could be used to plant replacement trees, however, this was not a cure.
- 3. Mr Whiting (Cabinet Member for Planning, Highways, Transport and Waste) confirmed that the A26 sink hole was due to be completed by the 7 October 2018, subject to weather conditions and third parties meeting their agreed installation dates.
- 4. Further to the report to an earlier E&T Cabinet Committee regarding the proposed consultation on charging for non-household waste, the consultation had started and due to close on 1 November 2018, following which a decision would be made on whether Kent County Council introduced a charge for such waste. Mr Whiting also informed the Committee of the extended opening hours at Dartford, Maidstone and Swanley HWRC's, with a 6pm closure on Wednesdays and a 6.30pm closure on Thursdays. The extended hours would be gradually reduced through September.
- 5. Mr Whiting said that Highways England was preparing a Development Consent Order (DCO) which would form part of the initial process for the Statutory Consultation on the Lower Thames Crossing. Mr Whiting assured Members that the response would be presented to the Committee prior to its submission. The Lower Thames Crossing Consultation was due to start in October 2018.
 - (a) In response to Members concerns regarding the Crossrail 1 Line to Abbey Woods, Mr Whiting confirmed that the DFT had announced that this had

been delayed until the autumn of 2019. With regards to Thameslink changes Mr Whiting said that getting the service right was fundamental. Maidstone would start to see the benefit of the changes by December 2019 and Kent County Council fully supported this position. Mr Whiting agreed to chase the response from Joseph Johnson (Minister of State, Department for Transport).

- (b) Mr Whiting confirmed that data had been received from the Lower Thames Crossing on the proposed traffic modelling and said that this would be available to Members in conjunction with the final consultation report.
- (c) In response to non-household waste, Mr Whiting confirmed that there was a definitive list of non-household waste items that would be circulated to Members of the Committee.
- 6. RESOLVED that the verbal updates be noted, with thanks.

117. Performance Dashboard (*Item 8*)

Richard Fitzgerald (Business Intelligence Manager, Performance, Strategic Business, Development &Intelligence) was in attendance for this item.

- 1. Mr Fitzgerald introduced the Performance Dashboard which showed progress made against targets set for Key Performance Indicators (KPIs) up to the end of July 2018. Mr Fitzgerald advised the committee that the data for 'DT06 Percentage for Highway Licence applications completed online' was available and should have been included within the published dashboard.
- 2. In response to Members queries regarding DT04, Mr Fitzgerald agreed to correct the wording.
- 3. In response to Members concerns regarding the newly adopted incentivised model and the proportion of waste diverted from landfill, Mr S Jones (Director of Highways, Transportation and Waste) said that the Districts involved had shown a positive improvement. He informed Members that whilst the figure for landfill waste remained relatively low and was within the set target level, the key areas of concern were those that posed a hazardous risk such as animal and asbestos disposal. Mr Jones said that the incentivised model could be adopted by other District Councils, however, the model would need to be compatible and phased in gradually.
- 4. Members raised concern regarding the Year to Date figure of the LED Streetlight conversions. Mr Jones said that Kent Count Council had recently awarded the maintenance contract to Bouygues Energies and Services Infrastructure UK Ltd. (BYEs). Prior to the this, streetlighting maintenance was

- provided through the highways term maintenance Mr Jones was confident that the new supplier would improve the LED repair rates.
- 5. In response to the management of footways, Mr Whiting agreed to consider a Key Performance Indicator to monitor these going forward.
- 6. Members questioned the measures put in place to tackle fly-tipping as a result of charging for municipal waste, Mr Whiting said that work would continue to be done with the District Councils and partner agencies to monitor fly-tipping. Mr Whiting reiterated to Members that the consultation on charging for non-household waste items had commenced and that a decision would only be made once the public view had been sought.
- 7. In response to Members queries regarding the effectiveness of the new pothole repair procedures, Mr Jones said that an additional £10 million had been budgeted for to assist with further repairs. The Pothole Blitz was a proactive campaign that helped the Highways Team to identify immediate risks, trial new treatments and create an intelligence led approach to ensure well informed decisions in the future.
- 8. Members commended the work of the officers and furthermore, commended Mr Love for his work on the Kent Resource Partnership
- 9. RESOLVED that the reported be noted.

118. Big Conversation (*Item* 9)

Phil Lightowler (Head of Public Transport) was in attendance for this item.

- 1. Mr M Whiting (Cabinet Member for Planning, Highways, Transport and Waste) introduced the report which provided Members with an update on the progress of the Big Conversation Consultation and the next stage of the programme. Mr Whiting took the opportunity to thank Rob Clarke (Project Manager), Phil Lightowler (Head of Public Transport) along with all colleagues, Members and Parish Councillors for their extensive work and input at all public meetings.
- 2. Mr Lightowler said that the consultation sought to understand community views on three proposed ideas: feeder services, bookable services and taxibus services, the concept of which was to link communities without routes to mainline services. The Big Conversation Consultation was supported through a series of public meetings and a survey which received 2355 responses. The next stage of the programme involved analysing the responses which would help to inform the development of the pilot schemes. An update report would then be presented to the Programme Board and then to the Cabinet Member for approval. A final report would be considered by the Environment and

Transport Cabinet Committee Mr Lightowler informed the Committee that the Bus Summit was due to be held on 30 October 2018 and details of the event were within the report if Members wished to attend. Mr Whiting confirmed that the Bus Summit would be webcast to facilitate those who could not attend.

- 3. In response to Members concerns regarding the £18 per person subsidy figure, Mr Whiting clarified that the objective of the consultation was not solely about buses it was to identify ways in which Kent County Council could save money on the expensive subsidies and how these could be reinvested into rural areas to improve and/or provide public transportation. The specific question around whether people were willing to pay towards an improved public transport service was asked at every meeting, however, the response to this question was not yet known and would be available in the published Lake Market Research report. Mr Whiting said that there was a £0.5 million budget set aside to facilitate the pilot schemes, however, the pilots would not be introduced until 2019. The criteria against which the three ideas were being evaluated against were set out at paragraph 3.2 on page 33 of the agenda.
- 4. Mr Lightowler assured members that the English National Concessionary Travel Scheme (ENCTS) permits were a statutory obligation for Kent County Council and those who were entitled to and used an ENCTS permit would not be required to pay for public transportation. There were no proposals to introduce charging, however, Mr Lightowler acknowledged that this had been a major misconception reported throughout the Big Conversation. The Consultation focused on very new and radical ideas that addressed issues of entitled ENCTS users not having access to bus services and asked those users for their views on whether they would be willing to pay a voluntary contribution to fund a bus service.
- 5. In response to queries regarding the Equality Impact Assessment (EQIA), Mrs Cooper said that the EQIA was a living document and that the initial assessment was carried out in June 2018. A revised EQIA would be published following the feedback from the consultation.
- 6. Members commended the work and support of all staff and Members involved in the Big Conversation Consultation.
- 7. RESOLVED that the report be noted.

119. Kent & Medway Energy & Low Emissions Strategy - Emerging evidence and priorities

(Item 10)

Carolyn McKenzie (Head of Sustainable Business and Communities) and Deborah Kapaj (Sustainable Estates Programme Manager, Sustainable Business and Communities) were in attendance for this item.

- 1. Mr Payne (Deputy Cabinet Member for Planning, Highways, Transport and Waste) introduced the report that provided Members with an update on the development of an Energy and Low Emissions Strategy for Kent and Medway and the emerging priorities for action.
- 2. Ms McKenzie said that the paper was a further update to the report presented to the Environment and Transport Cabinet Committee in May 2018 which set out the evidence base and suggested actions for early consultation feedback. The on-going development of the strategy would continue to be informed through extensive engagement with stakeholders and the Kent Environment Strategy Cross Party Members Group. Ms McKenzie highlighted to the Committee the five key themes (pages 54 57) and the potential options for action, which included:
 - Leadership and Governance
 - Evidence and Intelligence
 - Policy, Planning and Guidance
 - · Financing and Investment
 - Communications and Engagement

Ms McKenzie concluded that the specific costed measures had not yet been defined, however, the evidence gathered indicated a clear need for further action in Kent with support from District Partners, the Kent and Medway Economic Partnership and the SE Local Enterprise Partnership to deliver sustainable growth, improve health outcomes and address the risks of climate change. The proposed initiatives would be presented to the Committee at a later date and assurance was given to Members that the proposals would be evaluated using a business case, value for money approach with external funding to ensure maximum impact.

- 3. In response to Members queries, Ms McKenzie confirmed that the preparation of the action plan had been moved to the autumn as complex areas required further research. Further work was also needed to be undertaken with partners to ensure a cohesive strategy.
- 4. With regard to anti-idling policies, work had been done in conjunction with Canterbury District Council to implement an anti-idling policy in an attempt to reduce pollution. Work had also been carried out with Licencing authorities which looked at providing taxi ranks with electric charging points.
- 5. Ms McKenzie explained that many of the potential actions to improve energy and low emissions could not be enforced by Kent County Council, however, the Council was exploring the feasibility of those options which was why the report used terminology like 'exploration.'

- 6. In response to nuclear sources and emission levels, Ms McKenzie said that the paper focused primarily on the work that had already began, however, Districts had raised questions concerning nuclear power sources and work around this would be considered. In regard to fusion production, Ms McKenzie hoped that the strategy would contain a section that looked at all types of new technology and the feasibility work required around these types of technology. Ms McKenzie agreed to look at whether a breakdown of the fuel consumption could be provided to Members.
- 7. Mr Whiting commended the work of Mr Payne who was leading on the Energy and Low Emissions Strategy for Kent and Medway and all the officers involved.

8. RESOLVED that the:

- (a) evidence gathered to date and emerging analysis; and
- (b) the proposed themes and potential actions outlined in Section 5, to help shape the final draft strategy,

be noted.

120. Approach to Managing Highway Structures (*Item 11*)

Andrew Loosemore (Head of Highways Asset Management) and Kathryn Moreton (Asset Management, Drainage, Structures and Safety Barriers) were in attendance for this item.

- 1. Mr M Whiting (Cabinet Member for Planning, Highways, Transport and Waste) introduced the report that outlined the approach taken by the Highways Asset Management team in managing highway structures in Kent, with specific reference to sub-standard highway structures. Mr Whiting was pleased to announce that there had been no structural failures resulting in injury reported in the last 30 years.
- 2. Mr Loosemore assured Members that the management of highway structures was underpinned by a regime of regular inspections and quality control processes to reduce the deterioration and degradation of bridges. The report demonstrated the process for identifying substandard structures and the resources available to do so.
- 3. Mrs Moreton said that each year the RAC Foundation would submit a Freedom of Information (FOI) request to all bridge authorities in England seeking data on the condition of substandard structures (bridges over a 1.5m span). The RAC Foundation report revealed that 4.4% of bridges were

deemed to be substandard and did not meet the current loading requirements. In Kent however, the number of substandard bridges sat at 3.8% which was below the national average. The report also identified that it would cost £934 million to repair all substandard structures within England which would be equivalent to £271,000 per structure. Mrs Moreton said that whilst there had been 39 substandard structures identified in Kent, this was a consistent figure and was below the national average.

- 4. In response to Members queries, Mr Loosemore said that the mitigating measures in place ensured safety for the road user and the structure itself and this was monitored on a regular basis. Whilst there was a need for further funding, the approach to managing structures was based on risk. Those structures identified as an immediate risk would be completed as a priority and those that could not be addressed in the same year would continue to have regular inspections and mitigating measures would be put in place to ensure the safety of the structure and the road user. Mr Loosemore confirmed that structures submerged in water received specialist underwater inspections.
- 5. Mrs Moreton said that highway bridges were subject to a principle inspection, however, should concerns arise then a more comprehensive inspection would also be carried out with increased monitoring every three to six months to identify degradation of structures that may be deemed to be more complex.
- 6. RESOLVED that the report be noted.

121. Winter Service Policy for 2018/19 (*Item 12*)

Carol Valentine (Highway Manager, West) was in attendance for this item.

- 1. Mr M Whiting (Cabinet Member for Planning, Highways, Transport and Waste) introduced the report that set out the revisions to the Winter Service Policy. Mr Whiting said that there had been no substantive changes to the general custom and practice in which the Highways Team operate in terms of managing the winter service, the changes within the policy were simply to reflect that practice.
- 2. Mrs Valentine drew Members attention to page 84 of the agenda which highlighted the work that had been done over the summer to improve the winter service. The three key changes to the policy included: the Smart Winter Project whereby additional sensors would be used to monitor the road surface temperatures which would in turn provide data to optimise primary routes; the optimisation of secondary routes; and the farmers gritting trial which again, fed into optimising resources and looking at possible secondary routes. Mrs

Valentine advised the Committee that the Equality Impact Assessment was available and would be circulated to Members.

- 3. In response to the minimum salt stock levels, Mrs Valentine said that there was 16,800 tonnes of salt which was sufficient and would cover the entire winter period.
- 4. Mrs Valentine confirmed that Parish Seminars were due to take place in November 2018 and the Winter Service Policy would be a key item on the agenda for discussion.
- 5. In response to queries regarding media and communication, Mr Loosemore agreed that communication was essential during the winter season and was a valuable asset during the Beast from the East in helping to keep people safe. There was guidance issued by the Department for Transport (DfT) which was available on the Kent County Council website, however, work continued to be done on improving public guidance.
- 6. RESOLVED that the proposed changes to the Winter Service Policy for 2018/19 to include the following:
 - (s.5.5.4) Observational data from road weather sensors will be used to validate pre-salting decisions
 - (s. 6.1.1) Secondary routes to be treated when all primary routes treated and resources available
 - (s. 6.4.2) Farmers trial to be expanded

be noted.

122. Work Programme for 2018/19 *(Item 13)*

- Mrs Cooper (Corporate Director of Growth, Environment and Transport) informed the Committee that the Kent Port Access Contingency Planning item had been deferred to the November Cabinet Committee due to the complex nature of the work involved. The Members request to address concerns regarding the management of traffic and freight was acknowledged.
- 2. RESOLVED that the Work Programme be noted subject to the inclusion of the following items:
 - (a) A factual report on the progress of the Manston Airport Development Consent Order

(b) A progress report on the railroad ferry service into Ramsgate

123. Street Lighting Term Services Contract (*Item 14*)

Andrew Loosemore (Head of Highways Asset Management) and Sue Kinsella (Streetlighting Asset Management) were in attendance for this item.

- 1. Mr M Whiting (Cabinet Member for Planning, Highways, Transport and Waste) introduced the report that provided an overview of the Street Lighting Term Services Contract. Mr Whiting was pleased to announce that the project was the largest of its type in the UK and had been successful in delivering on time, within budget and with very few complaints due to the strong partnership between the staff at Bouygues Energies and Services Infrastructure UK Ltd. (BYEs) and the officers within Kent County Council.
- 2. Mr Loosemore informed the Committee that Kent County Council had entered into a fifteen-year term Maintenance Contract with BYEs as of 1st September 2018. The LED conversion project was valued at £40 million and required a specific team to manage the contract and all aspects of eventualities to ensure a high standard of service deliverance.
- 3. Ms Kinsella informed the Committee that as of June 2018, a total of 100,000 conversions has been completed. In recognition of the success of the project and its achievements in reducing energy consumption and carbon emissions, the Highways Asset Management Team would be attending the Highway Magazine Awards as finalists on 17 October 2018.
- 4. In response to queries regarding the number of LED conversions in Thanet, Ms Kinsella confirmed that there was 15,000 still needing completion across the county. The process had been prolonged in Thanet as the LED conversions could not take place until the concrete columns had been replaced.
- 5. Ms Kinsella confirmed that Kent County Council maintained streetlighting for seven District Councils. A record of ownership for each streetlight was available and should Members have a query regarding this, the Streetlight Asset Management Team would be able to assist.
- 6. RESOLVED that the contents of the report be noted.

From: Mike Whiting, Cabinet Member for Planning, Highways, Transport

and Waste

Barbara Cooper, Corporate Director of Growth, Environment and

Transport

To: Environment & Transport Cabinet Committee – 28th November

2018

Subject: Performance Dashboard

Classification: Unrestricted

Summary:

The Environment and Transport Performance Dashboard shows progress made against targets set for Key Performance Indicators. The latest Dashboard has data up to September 2018.

Recommendation(s):

The Environment and Transport Cabinet Committee is asked to NOTE the report.

1. Introduction

- 1.1. Part of the role of Cabinet Committees is to review the performance of the functions of the Council that fall within the remit of the Committee.
- 1.2. To support this role, Performance Dashboards are regularly reported to each Cabinet Committee throughout the year, and this is the third report for the 2018/19 financial year.

2. Performance Dashboard

- 2.1. The current Environment and Transport Performance Dashboard is attached at Appendix 1.
- 2.2. The Dashboard provides a progress report on performance against target for the Key Performance Indicators (KPIs) included in this year's Directorate Business Plan.
- 2.3. The current Dashboard provides results up to the end of September 2018.
- 2.4. The Dashboard also includes a range of activity indicators which help give context to the Key Performance Indicators.
- 2.5. Key Performance Indicators are presented with RAG (Red/Amber/Green) alerts to show progress against targets. Details of how the alerts are generated are outlined in the Guidance Notes, included with the Dashboard in Appendix 1.
- 2.6. Latest performance is ahead of target for all but one of the key performance indicators in Highways & Transportation. Emergency incidents attended within 2 hours was 1% behind target during September with difficulty responding to all

- drainage incidents within 2 hours during periods of heavy rainfall. Activity levels remain high due to the knock-on effect of the severe late winter weather.
- 2.7. Performance is ahead of target for all Waste Management indicators, with the exception of waste recycled and composted at Household Waste Recycling Centres (HWRCs). Overall recycling rates for the county have shown a slight decline this year from a peak of 49.9% last year. HWRCs saw a decline in recycling rates last year and recycling levels have not improved this year.
- 2.8. For digital take-up, four indicators are ahead of target and three behind target, two of which had their targets increased compared to last year. Actions are in place to improve performance against these indicators. Digital take up for Young Persons Travel Pass applications was slightly lower than at the same time last year, but the figures for the year are expected to improve when half year passes are renewed in January.
- 2.9. For Environment, Planning and Enforcement, both indicators are meeting target. Greenhouse Gas emissions have reduced significantly ahead of the stretching target, with LED streetlight conversions being the major reason for this improvement.

3. Recommendation(s):

The Environment and Transport Cabinet Committee is asked to NOTE this report.

4. Background Documents

The Council's Business Plans:

http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/business-plans

5. Contact details

Report Author: Richard Fitzgerald

Business Intelligence Manager - Performance

Strategic Commissioning - Analytics

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Relevant Director: Barbara Cooper

Corporate Director, Growth, Environment and Transport

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Environment and Transport Performance Dashboard

Financial Year 2018/19

Results up to September 2018

Produced by Strategic Commissioning - Analytics

Publication Date: October 2018



Guidance Notes

Data is provided with monthly frequency except for Waste Management where indicators are reported with quarterly frequency and on the basis of rolling 12 month figures, to remove seasonality.

RAG RATINGS

GREEN	Target has been achieved		
AMBER	Floor Standard achieved but Target has not been met		
RED	Floor Standard has not been achieved		

Floor standards are set in Directorate Business Plans and if not achieved must result in management action.

DOT (Direction of Travel)

1	Performance has improved in the latest month/quarter
Û	Performance has worsened in the latest month/quarter
\Leftrightarrow	Performance is unchanged this month/quarter

Activity Indicators

Activity Indicators representing demand levels are also included in the report. They are not given a RAG rating or Direction of Travel alert. Instead they are tracked within an expected range represented by Upper and Lower Thresholds. The Alert provided for Activity Indicators is whether they are in expected range or not. Results can either be in expected range (**Yes**) or they could be **Above** or **Below**.

Key Performance Indicators Summary

Highways and Transportation	Month RAG	YTD RAG
HT01 : Potholes repaired in 28 calendar days (routine works not programmed)	GREEN	GREEN
HT02 : Faults reported by the public completed in 28 calendar days	GREEN	GREEN
HT03 : Streetlights repaired in 28 calendar days	GREEN	GREEN
HT04 : Customer satisfaction with service delivery (100 Call Back)	GREEN	GREEN
HT08 : Emergency incidents attended to within 2 hours	AMBER	GREEN
HT11c : Number of LED streetlight conversions (since start of programme)	GREEN	N/a

Waste Management	RAG
RAG reported for rolling 12 month	
WM01 : Municipal waste recycled and composted	GREEN
WM02 : Municipal waste converted to energy	GREEN
WM01 + WM02 : Municipal waste diverted from landfill	GREEN
WM03 : Waste recycled and composted at HWRCs	AMBER

Digital Take up – reported year to date	YTD RAG
DT01 : Percentage of public enquiries for Highways Maintenance completed online	AMBER
DT02 : Percentage of Young Persons Travel Pass applications completed online	AMBER
DT03 : Percentage of concessionary buss pass applications completed online	GREEN
DT04 : Percentage of speed awareness course bookings completed online	AMBER
DT05 : Percentage of HWRC voucher applications completed online	GREEN
DT06 : Percentage of Highway Licence applications completed online	GREEN
DT13 : Percentage of 16+ Travel Cards applied for online	GREEN

Environment, Planning and Enforcement	YTD RAG
EPE20 : Percentage of planning applications which meet DCLG standards and requirements	GREEN
EPE13 : Greenhouse Gas emissions from KCC estate (exclud. schools)	GREEN

Service Area	Director	Cabinet Member
Highways & Transportation	Simon Jones	Mike Whiting

Key Performance Indicators

Ref	Indicator description	Latest Month	Month RAG	DOT	Year to Date	YTD RAG	Target	Floor
HT01	Potholes repaired in 28 calendar days (routine works not programmed)	100%	GREEN	⇔	97%	GREEN	90%	80%
HT02	Faults reported by the public completed in 28 calendar days	95%	GREEN	Û	93%	GREEN	90%	80%
HT03	Streetlights repaired in 28 calendar days	92%	GREEN	仓	93%	GREEN	90%	80%
HT04	Customer satisfaction with service delivery (100 Call Back)	92%	GREEN	仓	85%	GREEN	75%	60%
HT08	Emergency incidents attended to within 2 hours	97%	AMBER	Û	98%	GREEN	98%	95%
HT11d	Number of actual LED streetlight conversions (since start of programme)	108,004	GREEN		N/a		106,760	96,080

HT08 – Performance for September was slightly below the 98% target and this was due to high volumes of drainage emergencies, with access to a sufficient number specialist tankers not being available to pump up water in periods of heavy rainfall at all affected locations. These emergencies are triaged and priority is given to property flooding with these sites also being the focus for capital improvement schemes. Where flooding impacts only on the highway, some minor roads are closed until specialist equipment is available or until the water subsides.

Service Area	Director	Cabinet Member
Highways & Transportation	Simon Jones	Mike Whiting

Activity Indicators

Ref	Indicator description	Year to date	In expected	Expected	Prev. Yr	
Kei			range?	Upper	Lower	YTD
HT01b	Potholes repaired (as routine works and not programmed)	8,070	Above	7,050	4,650	4,513
HT02b	Routine faults reported by the public completed	31,806	Above	28,900	22,900	24,411
HT03b	Streetlights repaired	2,459	Below	8,480	6,930	5,913
HT06	Number of new enquiries requiring further action (total new faults)	49,581	Yes	52,800	43,200	44,615
HT07	Work in Progress (outstanding enquiries waiting action)	7,411	Above	6,900	5,400	5,688

HT01b & HT02d – The number of potholes repaired and faults reported has been high this year, due to the severe winter weather at the start of the year.

HT03 – Over 100,000 LED conversions have now been completed and this is leading to far less faults. Bouygues, the contractor delivering the conversion project, has now taken over the routine maintenance from 1st September.

HT07 - Work in Progress remains high following the severe winter weather. The more complex works such as drainage and flooding require further investigation and design.

Service Area	Director	Cabinet Members
Waste Management	Simon Jones	Mike Whiting

Key Performance Indicators (Figures are provided as rolling 12 month totals to remove seasonality)

Ref	Indicator description	Latest Quarter	RAG	DOT	Target	Floor	Previous Quarter
WM01	Municipal waste recycled and composted	49.1%	GREEN	Û	46.8%	44.3%	49.5%
WM02	Municipal waste converted to energy	50.2%	GREEN	仓	47.9%	45.4%	49.8%
01+02	Municipal waste diverted from landfill	99.3%	GREEN	⇔	94.7%	89.7%	99.3%
WM03	Waste recycled and composted at HWRCs	68.2%	AMBER	Û	69.3%	67.3%	68.3%

WM01 – After two years of steady improvement, household recycling in the county peaked at 49.9% in the year to December 2017, and has now since a slight decline so far this year.

WM03 – Recycling rates at HWRCs during 2017 and have been relatively stable so far this year.

Activity Indicators

Ref		Latest	In expected	Expecte	Previous		
Rei	Indicator description	Quarter	range?	Upper	Lower	Quarter	
WM05	Waste tonnage collected by District Councils	536,772	Below	560,000	540,000	540,736	
WM06	Waste tonnage collected at HWRCs	168,912	Below	190,000	170,000	172,778	
05+06	Total waste tonnage collected	705,684	Below	750,000	710,000	714,713	

WM05 and WM06 – Following an increase in waste tonnage during 2016, waste tonnage arisings have been declining over the last 2 years and are now 3.4% lower than at September 2016, despite significant population growth across the county.

Service Area	Director	Cabinet Member
Highways, Transportation and Waste	Simon Jones	Mike Whiting

Digital Take-up indicators

Ref	Indicator description	Year to Date	YTD RAG	DOT	Target	Floor	Previous Year
DT01	Percentage of public enquiries for Highways Maintenance completed online	44%	AMBER	‡	50%	25%	43%
DT02	Percentage of Young Persons Travel Pass applications completed online	77%	AMBER	Û	80%	60%	82%
DT03	Percentage of concessionary bus pass applications completed online	26%	GREEN	\$	20%	5%	18%
DT04	Percentage of speed awareness course bookings completed online	78%	AMBER	‡	80%	65%	80%
DT05	Percentage of HWRC voucher applications completed online	98%	GREEN	‡	98%	80%	97%
DT06	Percentage of Highway Licence applications completed online	80%	GREEN	Û	60%	50%	59%
DT13	Percentage of 16+ Travel Cards applied for online	78%	GREEN	仓	50%	40%	58%

DT01 – The target has increased this year from 40% last year. The top five faults reported online reporting are potholes (72%), Streetlights (67%), Drainage (51%), Soft Landscaping (46%) and Roadworks (9%).

DT02 – A slightly higher proportion of paper applications have been received so far this year, but digital take-up is expected to increase in January with the mid-year renewals for half-year passes, which are mostly made on on-line.

DT04 - This target has increased this year from 75% last year. A project is in place to renew the on-line software system to improve the customer journey and encourage more people to book online.

Division	Director	Cabinet Member
Environment, Planning and Enforcement	Katie Stewart	Mike Whiting

Key Performance Indicators

Ref	Indicator description	Year to Date	RAG	DOT	Target	Floor	Prev. Yr.
EPE20	Percentage of planning applications which meet DCLG standards and requirements	100%	GREEN	仓	100%	80%	100%

Key Performance Indicator (reported quarterly in arrears)

Ref	Indicator description	Latest Quarter	RAG	DOT	Target	Floor	Previous Year
EPE14	Greenhouse Gas emissions from KCC estate (excluding schools) in tonnes	35,773	GREEN	Û	38,600	41,700	40,400

From: Mike Hill, Cabinet Member for Community and Regulatory

Services

Mike Whiting, Cabinet Member for Planning, Highways,

Transport and Waste

Barbara Cooper, Corporate Director of Growth, Environment

and Transport.

To: Environment and Transport Cabinet Committee – 28th

November

Subject: Update on Preparedness to Respond to Brexit – Transport,

Borders and Emergency Planning

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: N/A

Summary:

This report provides an overview of the plans and work undertaken to date in preparation for potential changes to border arrangements following Brexit.

It focuses upon three key services:

- a. Trading Standards
- b. Highways and Transport
- c. Emergency Planning/Business Continuity

Recommendation(s):

The Cabinet Committee is asked to note and discuss the planning and preparedness of services set out in the report.

1. Background

- 1.1. The UK will leave the EU on 29th March 2019. This will result in a modification to border controls including custom checks. Initial indications have identified that this could materially affect the way KCC delivers its core services, the way Kent's roads function, and the way local businesses and residents go about their day to day activities.
- 1.2. It has been suggested that Kent may need to accommodate delays of around 12 hours on the key routes to the UK border, and the current best estimate is that Kent will need to cope with holding up to 10,000 HGVs on a routine basis.

- 1.3. Concerns remain around the likely changes to custom checks on passenger traffic and the need for trading standards to intervene on a more regular basis due to revised import/export requirements.
- 1.4. Since 2017, KCC has been engaged with Government departments along with local, regional and national partners to try to clarify the potential changes at the border to establish the potential impact across Kent.
- 1.5. Since early 2018, KCC has increasingly allocated resources to develop contingency plans and to identify the various activities necessary to mitigate the perceived and changing impact of Brexit.
- 1.6. All such plans have been focused on minimising the potential impact upon the residents and businesses of Kent arising from changes to border arrangements post-Brexit, and several mitigations have been developed.
- 1.7. We have identified to Government the works, people, facilities, costs and legal authority required to successfully deliver the various mitigations.
- 1.8. This report provides an overview of work to date by the following teams:
 - Trading standards As the market surveillance authority, KCC's trading standards team is responsible for inspecting goods crossing the UK border in Kent which are referred to the team via UK Border Force and the national Single Point of Contact.
 - Highways operation and transport planning As highways authority, KCC is responsible for maintaining the KCC-managed network, as well as working in collaboration with Highways England, DfT and other authorities to support resilience of the wider road network across Kent.
 - Resilience and emergency planning As a Category 1 responder under the Civil Contingencies Act, KCC is responsible for working in collaboration with other Cat 1 responders to support the county's response to, and recovery from, incidents of the kind that is likely to occur from Day 1 of Brexit border arrangements coming into effect.

2. Progress to Date

- 2.1. KCC officers have sought information from Government departments and its agencies to establish traffic volumes, custom control activities and new border rules under consideration. We have worked alongside key partners such as DfT, Kent Police, and Highways England to understand their plans and actions.
- 2.2. The KRF has been actively developing contingency plans and testing assumptions and proposals. Its membership has extended significantly with numerous Government departments, all Kent Districts and out-of-county (or neighbouring otherwise it sounds as if they are coming from all directions!!) police and county councils now participating.

- 2.3. A range of different scenarios and durations of disruption have been considered, including a worst-case scenario. This would entail a no deal scenario where full third country custom checks would be required at the border after 29 March 2019.
- 2.4. In August the planning scenario being proposed by national government was to plan for 6 weeks of significant traffic congestion across Kent, which would include 4 weeks of significant traffic disruption, followed by 2 weeks of recovery of the roads to normal.
- 2.5. Since August, the planning scenarios being considered by government include a worse-case scenario of 6 month of disruption, although this is considered extreme due to the high degree of uncertainty around the likely border arrangements.
- 2.6. It is clear, however, that any deal would entail some degree of disruption to border arrangements with associated traffic congestion. Any change in operation would be expected to lead to some teething problems, at least in the short term.
- 2.7. Work to date has mainly focused not on the detail of border arrangements, which are still to be determined, but rather the impact on traffic congestion likely to be seen a result of changes at the border. These assumptions are based on an understanding of the capacity of Kent ports and roads.
- 2.8. Such congestion could exceed that of previous incidents experienced in Kent, including Operation Stack in 2015 which saw almost 7,000 HGVs contained on the M20 in Kent. Local Kent roads experienced significant gridlock and exceptionally high traffic volumes as a result.
- 2.9. In 2016, when customs checks became erratic due to weekend industrial action, the county saw significant delays at the UK border across all vehicle types (tourist and freight) and queues quickly formed across both strategic and local road networks. Delays of over 12 hours were experienced.
- 2.10. A dedicated freight traffic management plan, Operation Fennel, is being designed and contains the various mitigations (Dover TAP, Brock contra flow, Manston Airport and M26) available for deployment to mitigate the potential traffic disruption. Work remains ongoing to complete this operational plan and to develop plans for tourist traffic.
- 2.11. Other considerations include the impact upon Trading Standards, as an increase in border checks would have material impact upon this service. As reported to the Growth Economic Development and Communities Cabinet Committee in July 2018, the service has already seen an increase in referrals to inspect third country goods following a number of developments unrelated to Brexit including the opening of a Fast Parcel Hub at Dartford and an increase in referrals from the Single Point of Contact.

- 2.12. In light of potential further increases from a change to the way that European goods are handled post-Brexit, the service is working as closely as possible with Government departments and agencies with a remit for border controls and checks to understand the likely changes to requirements for imports and exports post-Brexit, and as a result of this ongoing dialogue, is increasing its staff numbers to ensure sufficient capacity to handle the impact of any changes to border arrangements after 29 March 2019.
- 2.13. In order to help local authorities, businesses and communities across the country to better prepare, a series of technical notices have been published by Government to try to better articulate the new environment anticipated post-Brexit.
- 2.14. **Table 1** provides an overview of the progress to date in KCC engaging with and preparing for Brexit across the three services identified in Para 1.8.

TABLE 1. Planning Progress to Date

Area of responsibility	Planning
Trading Standards Lead Director/ Officer: Katie Stewart Steve Rock	 Regular engagement of Government Departments through the Kent Border Steering Group (which is co-chaired by KCC and Government and includes a range of Government Departments and Dover District Council as Port Health Authority), and associated working groups, as well as National Trading Standards Recruitment prepared for a Border Team of between 4 and 14 inspection officers to be based at Dover, managed by the Trading Standards Consumer and Product Safety Team. The exact number is being kept under review in consultation with Government departments and agencies to ensure as accurate an estimate of the likely required capacity as possible. Seeking of external funds to cover the Border Team and associated costs – some of which are now to be covered by National Trading Standards
Highways and Transport Planning Lead Director/ Officer: Simon Jones	 Regular engagement with Government Departments through the Kent Strategic Freight Forum and Strategic Operation Fennel Group (which are chaired by KCC, and includes Highways England, Kent Police, DfT, Local authorities and industry) to shape Government's own contingency plans for the affected road network, as well as lobbying for the appropriate national contingency planning Consistent lobbying of Government for the appropriate enforcement powers to enable traffic authorities in Kent to implement the contingency plans now being developed – and principally to ensure that freight vehicles can be effectively directed to the appropriate contingency locations Exploration of a potential central location in which to base the operation of highways officers associated with managing the

- network from Day 1 likely to be co-located with the emergency and resilience team
- Direct engagement with Department for Transport to request a range of capital investment and revenue support required to manage Kent's highways considering the potential transport impacts arising from Brexit.

Resilience and emergency planning

Lead Director/Officer: Katie Stewart Fiona Gaffney

- Review of the Community Risk Register to identify and clarify risks facing Kent as a result of Brexit
- Proactive delivery of Operation Fennel Strategic and Tactical plans for Kent Resilience Forum partners, including transport planning. This includes the mobilisation of Op Fennel Strategic and Tactical Groups earlier this year to start reviewing and preparing the necessary plans.
- Exercise, Equity, held on 30 October to discuss and shape the tactical plans developed to date for traffic management
- Four additional exercises in early 2019 to test the partnership operation of the County Emergency Centre
- Development of a Kent Resilience Forum Brexit Coordination Group
- Employment of a Brexit Coordinator, Brexit Comms Officer, and a Brexit Project Officer to provide a dedicated team to coordinate the efforts of partners through the Op Fennel suite of structures and the associated exercises
- A multi-agency communications group
- 2.15. The above planning is highly resource intensive, and it is worth noting the impact that this resource pressure has on wider priorities and responsibilities in these areas.
- 2.16. For instance, in the resilience and emergency planning agenda, the resources of the Kent Resilience Forum have been largely refocused on Brexit border contingency planning, meaning that other previously identified resilience priorities, such as Op Quantity (i.e. the preparation of the county for a potential terrorist attack) and severe weather contingency planning (i.e. community resilience for flood events) have had to be reprofiled to later quarters.

3. Business Continuity

- 3.1. Whilst it is critical that the above three services are as prepared as possible for Brexit, it is also vital to recognise the indirect impact that the traffic congestion and other implications of changes to the border could have on KCC's other services (for example, disrupted school transport, delayed waste movement, delays to highway maintenance, staff attending work).
- 3.2. Therefore, in addition to the work of the Resilience and Emergency Planning Service (REPS) to coordinate the response to a worst-case scenario, the

REPS team are also supporting services across KCC to test their business continuity plans against potential Brexit scenarios.

- 3.3. This programme will enable services to put in place contingency measures to cope with and to identify the impact on the services' ability to deliver services.
- 3.4. This business continuity planning and the associated arrangements will be in place up to April 2019 but also into the new financial year to ensure the impact of any new arrangement is managed and monitored appropriately.

4. Post Brexit Business as Usual

- 4.1. It is recognised that a new and different routine will follow Brexit in the medium to longer term. This will impact both those services directly involved at and around the borders but also on our wider service delivery.
- 4.2. Work is underway, but until the final Brexit arrangements are confirmed, it is difficult to establish the new normality of custom checks and traffic volumes.
- 4.3. The work will consider issues such as new infrastructure which may be required for services affected by revised traffic volumes and how to overcome the recruitment challenges for those areas of the business that have traditionally relied on staff from the European Union.
- 4.4. Consideration is being given elsewhere in the business to the impact of the loss of European funding and how replacement funding can be secured as a result.

Recommendation(s)

Recommendation(s):

The Cabinet Committee is asked to note and discuss the planning and preparedness of services set out in the report.

Contact details

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From: Peter Oakford – Deputy Leader with delegated authority for Minerals

and Waste Local Plan Matters

Barbara Cooper, Corporate Director of Growth, Environment and

Transport

To: Environment and Transport Cabinet Committee – 28th November 2018

Decision No:

Subject: Kent Minerals and Waste Local Plan 2013 – 2030 Early Partial Review,

Kent Mineral Sites Plan and revised Local Development Scheme

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: Cabinet, County Council

Electoral Division: Countywide

Summary:

This report provides an update on the Kent Minerals and Waste Local Plan work following council's adoption of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP) in 2016. The KMWLF commits the County Council to prepare a Mineral and Waste Sites Plan to meet the need identified in the adopted Plan.

Following a call for sites and site appraisal work, this report proposes a Pre-submission Draft of the Kent Mineral Sites Plan identifying sites considered suitable in principle to allocate for minera development.

Following the reassessment of future waste capacity requirements in Kent, the evidence concludes that a Waste Sites Plan is no longer required. As a result, an Early Partial Review of the KMWLP is required. Implementation of KMWLP policies concerning mineral and waste safeguarding has also identified that modifications are necessary to improve their effectiveness. The attached Pre-Submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 has been prepared to address changes proposed to the waste strategy and the safeguarding policies.

Following consideration by Environment and Transport Sub Committee, Cabinet Committee and County Council, the agreed Draft Plans will be subject to a statutory period for representations and submitted to the Secretary of State for independent examination. Any representations received will be submitted with the Plans for consideration by the Secretary of State.

An updated Local Development Scheme is also proposed to reflect changes to the programme and timetable concerning the Early Partial Review and preparation of the Mineral Sites Plan.

Recommendation(s):

The Environment and Transport Cabinet Committee is asked to:

(i) consider and endorse, or make recommendations to the Cabinet Member responsible for the Minerals and Waste Local Plan on the proposed:

- (a) Pre-submission Draft of the Kent Mineral Sites Plan;
- (b) Pre- submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan; and,
- (c) the updated Local Development Scheme (revised timetable) to reflect changes to the programme and timetable concerning preparation of the Local Plan work.
- (ii) note that the decision to approve the Pre-submission Drafts Plans for submission to the Secretary of State for independent examination is a matter for County Council;
- (iii) request the County Council to:
- (a) Approve and publish the Pre-Submission Drafts of the Kent Mineral Sites Plan and the Early Partial Review of the Kent Minerals and Waste Local Plan for a statutory period of representation and to submit the Draft Plans to the Secretary of State for independent examination; and,
- (b) delegate powers to the Corporate Director for Growth, Environment & Transport to approve any non-material changes to the Mineral Sites Plan and Early Partial Review of the Kent Minerals and Waste Local Plan in consultation with the Deputy Leader prior to their publication and during their examination.

1. Introduction and Background

- 1.1 The Kent Minerals and Waste Local Plan 2013-30 (KMWLP) was adopted by the County Council in July 2016 as part of the Council's statutory responsibility to plan for future minerals supply and waste management within Kent. This Plan forms part of the Development Plan and is a key policy document for the determination of planning applications. The KMWLP sets out the County Council's strategy and policy framework for minerals and waste development in Kent which includes future capacity and supply requirements. The KMWLP commits the Council to identifying and allocating land considered suitable for minerals and waste development in a subsequent Waste Sites Plan and a Minerals Sites Plan.
- 1.2 At its meeting on 30 November 2017, the Environment and Transport Cabinet Committee (ETCC) considered a report on the progress of the Local Plan work. This included a reassessment of future waste capacity requirements in Kent that indicated that a Waste Sites Plan was no longer required and that an early Partial Review of the KMWLP was therefore needed. In addition, experience of implementing the Local Plan policies regarding mineral and waste safeguarding had revealed ambiguity in the wording of certain of their exempting criteria which was hindering the effectiveness of the policies. It was agreed that modifications were necessary to address this ambiguity. The Committee also recognised that a Mineral Sites Plan was still required.

1.3 The Committee resolved to:-

- i Undertake public consultation on options for minerals sites included in the Mineral Sites Plan Options 2017 and associated Sustainability Appraisal Scoping Report;
- ii undertake an early partial review of the KWMLP concerning future requirements for waste management and mineral and waste safeguarding;
- iii as part of the early partial review, undertake associated public consultation on proposed modifications to the KMWLP and the associated Sustainability Appraisal Scoping Report; and,

iv note the contents of an updated Local Development Scheme to reflect the Partial Review and changes to the timetable in terms of preparation of the Mineral Sites Plan.

Following consideration, the Cabinet Member responsible for the Local Plan took the decision to bring this resolution into effect.

1.4 This report provides an update on the Local Plan work following the public consultation referred to in paragraph 1.3 above. It proposes Pre-submission Drafts of the Mineral Sites Plan and the Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30. As County Council policy documents, decisions to approve the Pre-Submission Drafts for submission to the Secretary of State for independent examination are a matter for County Council. The Draft Plans will therefore be considered by this Cabinet Committee, Cabinet and then County Council. Prior to submission, the County Council is required by legislation to publish the Pre-Submission Drafts for a minimum six-week period for representations on soundness and legal compliance. Any representations received are then considered by the Inspector appointed by the Secretary of State to examine the soundness and legality of the Plan (in accordance with relevant planning policy and guidance).

2. Mineral Sites Plan

- 2.1 Following the adoption of the KMWLP, the County Council commenced work on the accompanying Mineral Sites Plan which will allocate sites in Kent for the types of minerals development needed to fulfil the vision and objectives of the KMWLP. This work included a review of the requirements for aggregates to be provided for by sites identified in the Mineral Sites Plan. Policy CSM2 of the KMWLP expects the Mineral Sites Plan to allocate sites for soft sand and for sharp sand and gravel based upon the most recent calculations of requirements set out in the Local Aggregates Assessment. To ensure that Kent is planning for sufficient requirements to the end of the Plan period, a review of need has been undertaken. This has identified a soft sand need of 2.5mt and a sharp sand and gravel need of 5.75 mt. However, it should be noted that the adopted KMWLP recognised that sharp sand and gravel resources in Kent are rapidly depleting. Policy CSM2 of the KMWLP therefore recognises that the need for sharp sand and gravel requirements can only be met whilst resources allow. In light of the greater abundance of soft sand resources there is no similar policy test for soft sand requirements.
- 2.2 Work began with a "Call for Sites" in late 2016, which invited nominations (e.g. from landowners and potential minerals operators) for sites to be considered for allocation to meet the KMWLP mineral supply requirements. All those parties that had previously had an interest in the Minerals and Waste Local Plan work were notified of the Call for Sites and invited to nominate sites as well as comment on a draft Site Selection Methodology. This included residents who have previously expressed an interest in minerals and waste plans in Kent, landowners, minerals and waste operators, local businesses, statutory organisations, local interest groups, parish, borough and district councils, councillors and others.
- 2.3 The Call for Sites, along with the methodology for site selection and assessment was agreed by the Cabinet Member for Planning, Highways, Transport and Waste in December 2016 following consideration of the matter at Environment and Transport Cabinet Committee in November 2016. The agreed site assessment process for the Mineral Sites Plan involves:
 - (i) Meeting the criteria in paragraph 2.4 below for a Mineral Site Option;
 - (ii) Initial screening a refined traffic light approach with a Red Amber Green (RAG) rating based on potential effects of development against a range of assessment criteria;
 - (iii) Consultation on Site Options; and

- (iv) Detailed Technical Assessment (DTA) to identify Preferred Options for allocation in a Pre-Submission Draft Mineral Sites Plan.
- 2.4 For a site to be considered a Mineral Site Option it had to:
 - (i) Align with the objectives of the KMWLP: The site must be able to provide minerals in accordance with the future needs for minerals identified in the KMWLP.
 - (ii) **Be justified**: The site must represent a suitable development opportunity based on a desktop assessment of the opportunities and constraints associated with its location.
 - (iii) **Be deliverable:** Development of the site should not result in severe adverse effects that would affect its deliverability, and its development should also be supported by the landowner.
- 2.5 This is in accordance with Policy CSM2 of the KMWLP that sets out the following criteria for selecting and screening the suitability of sites for allocation in a Mineral Sites Plan:
 - (i) The requirement for the mineral;
 - (ii) Relevant development management policies;
 - (iii) Relevant policies in district local plans and neighbourhood plans;
 - (iv) Strategic environmental information, including landscape assessment and Habitat Regulation Assessment as appropriate;
 - (v) Deliverability; and
 - (vi) other national planning policy and guidance

The Policy also states that sites to be identified in a Mineral Sites Plan will generally be where viable mineral resources are known to exist, where landowners are supportive of mineral development taking place and where the Mineral Planning Authority considers that planning applications are likely to be acceptable in principle in planning terms.

- 2.6 In response to the Call for Sites, 19 mineral sites were promoted for consideration, nine of which were selected as 'Options,' i.e. sites that were considered potentially suitable for allocation in the Kent Minerals Sites Plan, subject to public consultation and detailed technical assessment. A Site Evaluation Document setting out how the sites were initially assessed against the methodology (stage ii in paragraph 2.3 above) was considered by ETCC in November 2017 and was subject to public consultation. The views received have informed the detailed technical assessment stage of the plan making work that is considered in this report and its appendices. A summary of the views received on the Site Options is set out in Appendix 5. It should be noted that in respect of the M2 Site Lydd Quarry/Allen's Bank Extension, Lydd, the County Council received a Petition signed by 229 e-petition signatories and 747 written signatories objecting to proposal. Details of the petition are also set out in the Appendix.
 - 2.7 The Site Options subjected to detailed technical assessment (DTA) for soft sand were:

Site Ref	Soft Sand Sites	Estimated reserve
M3	Chapel Farm, Lenham	3.2mt
M8	West Malling Sandpit, Ryarsh	3.1mt (and 0.5mt of silica sand)

During the detailed technical assessment phase, the promoter amended the Chapel Farm site to remove the eastern parcel of the promoted site and minor revisions to the access route

onto the A20. Further information was also provided by the promoter of Site M8 indicating where the mineral would be excavated.

2.8 The Site Options for sharp sand and gravel were:

Site Ref	Sharp Sand and Gravel Sites	Estimated reserve
M2	Lydd Quarry/Allen's Bank Ext, Lydd	3.1mt
M7	Central Road, Dartford	0.9mt
M9	The Postern, Capel	0.6mt
M11	Joyce Green Quarry, Dartford	1.5mt
M13	Stonecastle Farm Quarry Ext, Hadlow/Whested	1.0mt
M12	Postern Meadows, Tonbridge	0.23 mt
M10	Moat Farm, Five Oak Green, Capel	1.5mt

During the detailed technical assessment The Postern, Capel site (M9) was withdrawn from further consideration by the site's promoter.

- 2.9 The remaining 10 sites promoted through the call for sites were not considered to be in alignment with the KMWLP (stage (i) of the assessment process) and so were not proposed as Site Options.
- 2.10 Full details of the nine sites that progressed to the DTA stage and the outcome of the assessment can be found in the supporting document Kent Mineral Sites Plan Minerals Site Assessment Document 2018 (see Appendix 2). The DTA stage considered a range of environmental impacts including landscape and visual impact, amenity, highways and transportation, biodiversity, historic environment, waste resources and flood risk, land stability and need. It also considered where necessary an assessment of Green Belt policy. The DTA work concluded that three of the sites should progress as sites for allocation in the Minerals Sites Plan one soft sand site and two sharp sand and gravel sites. These sites are considered acceptable in principle for mineral development, subject to planning applications demonstrating that certain development management criteria can be met. The DTA work also included Sustainability Appraisal for each site (See Appendix 7).
- 2.11 The Minerals Site Assessment document (Appendix 2) includes a summary of the views of interested parties including those of the local community. In the case of the M2 Site Lydd Quarry and Allen's Bank the Council also received a petition opposed to the development. It has 229 e-signatures and a further 747 written signatories. The petition objects on the basis of flood, risk, contamination of drinking water, increase in traffic and decrease in property values. The Council procedures on petitions require that this is brought to the attention of decision makers.

2.12 In summary, the DTA concluded the following:

M3 - Chapel Farm, Lenham - Western Site	Suitable for allocation in Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application stage
M3 - Chapel Farm, Lenham - Eastern Site	Site withdrawn by promoter – due to likely unacceptable impact on heritage asset. Not allocated in Pre-Submission Draft Mineral Sites Plan.
M8 - West Malling Sandpit, Ryarsh	Site not allocated in Pre-Submission Draft Mineral Sites Plan – inconsistent with green belt policy with regard to inappropriate development. An alternative promoted soft sand site at Chapel Farm, Lenham lies outside the Green Belt and is considered acceptable in principle to meet the soft sand mineral requirements in Kent. It is not therefore reasonable to conclude that the necessary 'very special circumstances' exist to override the presumption against inappropriate development within the Green Belt. It is noted that the site is within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) and the impacts upon the AONB are uncertain.
M2 - Lydd Quarry/Allen's Bank Ext, Lydd	Site not allocated in Pre-Submission Draft Mineral Sites Plan - Likely unacceptable impacts upon the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), the Special Area of Conservation (SAC) and the Ramsar Site; Likely unacceptable impact upon the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). In respect of parcel 23 (Allen's Bank), the likely unacceptable impact upon archaeological interests. It is noted that the impact upon the setting and character of the historic town of Lydd is uncertain.
M7 – Central Road, Dartford	Site not allocated in Pre-Submission Draft Mineral Sites Plan – Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable loss of biodiversity habitat, impact upon Local Wildlife Sites (LWS) and UK Biodiversity Action Plan (BAP) interests, likely unacceptable impacts on residential amenity, likely unacceptable air quality impact on AQMA and conflict with Local Plan open space objectives.
M10 - Moat Farm, Five Oak Green, Capel	Suitable for allocation in Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application stage
M11 – Joyce Green Quarry, Dartford	Site not allocated in Pre-Submission Draft Mineral Sites Plan - Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable air quality impact on AQMA, likely unacceptable loss of biodiversity habitat, impact upon LWS and UK Biodiversity Action Plan (BAP) interests and uncertainty that restoration proposals would meet ecological objectives to replace habitat and conflict with Local Plan open space objectives. The mineral proposal is

	considered to be inappropriate development within the Green Belt through restoration proposals and harm arising from highway impacts, air quality and biodiversity impacts.
M12 - Postern	Site not allocated in Pre-Submission Draft Mineral Sites Plan
Meadows,	- insufficient evidence to complete DTA in order to conclude with
Tonbridge	any certainty that the development is acceptable in principle for
	mineral development.
M13 - Stonecastle	Suitable for allocation in Pre-Submission Draft Mineral Sites
Farm Quarry Ext,	Plan, subject to meeting development management criteria at
Hadlow/ Whested	planning application stage
M9 The Postern,	Site withdrawn by Promoter – unable to demonstrate acceptable
Capel	access. Not allocated in Pre-Submission Draft Mineral Sites
	Plan.

The three sites considered suitable for allocation are set in the Pre-Submission Draft of the Minerals Sites Plan included at **Appendix 1.**

- 3. Early Partial Review of the KMWLP including Need for a Waste Sites Plan
- 3.1 The Early Partial Review of the KMWLP proposes modifications in the following areas:

A. Waste management:

- The strategy for provision of future waste management capacity
- The identification of site allocations for waste management facilities

B. Safeguarding - The approach to safeguarding mineral resources and waste management and minerals supply infrastructure.

The paragraphs below and the supporting evidence to this report set out the justification for proposed changes identified by the Early Partial Review. The detail of the proposed changes is set out in the Pre-Submission Draft - Early Partial Review of the Kent Minerals and Waste Local Plan 2018 which is attached at **Appendix 3**

- 3.2 The adopted KMWLP identified a shortfall in waste management capacity over the Plan period for the following types of waste management: waste recovery (energy from waste and organic waste treatment), hazardous waste, and the disposal of dredgings. To improve certainty concerning the provision of the required capacity, policies CSW7, CSW8, CSW12 and CSW14 commit the County Council to allocating sites suitable for accommodating related waste facilities in a Waste Sites Plan. Policy CSW4 sets the strategy context for waste management capacity. Calculation of the future waste management capacity requirements in the KMWLP had been undertaken in 2012 and so preparation for the Waste Sites Plan involved a review of those requirements to ensure that the amount of new capacity planned for is robust.
- 3.3 A key driver for the review of waste requirements was the implementation of a planning permission for a significant new waste recovery facility at Kemsley which meant that the amount of existing waste management capacity used to inform the approach in the KMWLP was no longer robust. Planning permission was granted in 2012 for the Kemsley Sustainable Energy facility, which would provide capacity for around 500,000tpa of non-hazardous waste recovery. During the preparation of the KMWLP, there was considerable uncertainty over

whether the facility would be built and so it was considered prudent not to factor this into the assessment of future capacity requirements. However, in August 2016, shortly after the adoption of the KMWLP, work commenced on the construction of the Kemsley facility, clearly indicating that the capacity would in fact be realised, substantially eliminating the waste recovery capacity shortfall identified in the KMWLP of 562,500tpa.

- 3.4 The adopted KMWLP also identified that sites would be identified in a Waste Sites Plan for hazardous waste (specifically landfill of asbestos) (policy CSW12) and for the disposal of dredgings (policy CSW14). Notwithstanding this policy support, the 'Call for Sites' did not reveal any need or support from industry, including the Port of London Authority, for the allocation of related sites.
- 3.5 In terms of additional organic waste treatment capacity, the review of waste requirements concluded that, while there is sufficient capacity within Kent to meet recycling and composting requirements overall, further organic waste treatment capacity could be justified; however, it is considered that the Plan's policies are sufficiently supportive, such that the identification of specific sites to provide any additional certainty that development will come forward, is not justified.
- 3.6 Overall, the review of waste requirements indicated that there was no need for additional waste recovery capacity and that there was insufficient justification for a Waste Sites Plan. As a result, changes to a number of the adopted KMWLP waste policies and explanatory text are required to remove the commitment to identify sites within a separate Waste Sites Plan. This will help ensure that there is no over-supply of recovery capacity within Kent. A change to adopted policies can only be realised via modifications which the County Council is statutorily obliged to publish for representations and then submit to the Secretary of State for independent examination.
- 3.8 Public consultation on these proposed changes as set out in the 'Kent Minerals and Waste Local Plan 2013-2030 Partial Review 2017' consultation document was undertaken between December 2017 and March 2018 and a summary of the comments received, with officer response, is set out in **Appendix 5**. Key concerns were raised that the revised waste needs assessment underpinning the partial review underestimates the future need for waste recovery capacity because it overestimates recycling performance and underestimates baseline arisings and the network of waste management infrastructure in Kent should be enhanced to realise associated benefits i.e. incineration with energy recovery facilities provide substantial inward investment, jobs and a supply of renewable/low carbon power and/or heat. Further representations suggest that the KMWLP Partial Review should acknowledge that additional organic waste treatment capacity is required.
- 3.9. The Partial Review work has been reconsidered in light of the concerns raised. This work has confirmed that the baseline assessments are robust. Changes have been made to recycling and recovery targets in Policy CSW4 which reflect actual measured performance in Kent and recent EU targets. As set out in **Appendix 5** and the Pre- Submission Draft of the Plan (**Appendix 3**) and its supporting evidence, no other significant changes are proposed to the strategy set out in the Kent Minerals and Waste Local Plan 2013-2030 Partial Review 2017 consultation document.

Minerals and Waste Safeguarding

3.10 Given the need for an early Partial Review (as described above), the opportunity has also been taken to consider whether there are other elements of the KMWLP which may benefit from amendment in light of 24 months' experience of implementing its policies. Generally, it is considered that the KMWLP is performing as intended; however, one matter has arisen in relation to the safeguarding of mineral resources and minerals and waste management

infrastructure. Implementation of the safeguarding policies DM 7 and DM 8 has revealed an ambiguity that means the policies are not being implemented wholly as intended.

- 3.11 Amongst other aims, the intention of these safeguarding policies is to ensure that development on sites for non-mineral development (i.e. housing and commercial) allocated in a Borough or District Local Plan would be exempt from the KMWLP's safeguarding provisions if the need to safeguard any mineral resource underlying the site, and/or proximate minerals and waste infrastructure, had been assessed and factored into the decision to allocate the sites. In practice, however, there have been occasions where the policies are being interpreted to exclude any site allocations in adopted development plans from the safeguarding process, regardless of whether minerals and waste safeguarding matters were considered during the site allocation process. This is not the intention of the policies, nor national policy guidance, and it has the potential to undermine the effectiveness of these policies. The Early Partial Review provides the opportunity to address this matter.
- 3.12 Proposed minor changes to policies DM7 and DM8, as well as supporting text to ensure that the safeguarding intention of the KMWLP is effective was the subject of public consultation between December 2017 and March 2018. A workshop was also held with the Borough and District Councils to discuss the proposal and invite comments. Details of the views received are set out in **Appendix 5** along with officer response. A number of minor changes have been made to related explanatory text to address concerns. The proposed revisions to the adopted Safeguarding policies and explanatory text are set out in the Pre-Submission Draft of the Early Partial Review of the Kent Minerals and Waste Local at **Appendix 3**.

4. Next Steps

- 4.1 Following consideration by ETCC and Cabinet Committee, County Council will be asked to agree that the Pre-Submission Draft Plans be submitted to the Secretary of State for independent Examination by a Government-appointed inspector. Prior to submission the Plans will be published for a statutory period for representations on soundness and legal compliance in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 4.2 During the examination, the Inspector will consider all representations received and may choose to convene public hearings. If requested by the Council, the Inspector can discuss changes needed to ensure soundness (known as 'main modifications'). If such changes are necessary, these will be reported to this Cabinet Committee, Cabinet and County Council for agreement prior to being published for representations. Ultimately, the Mineral Sites Plan and modifications to the KMWLP can only be adopted by the County Council following receipt of an Inspector's report that finds the Plan and the modifications sound and legally compliant. Adoption of the Plan and the modifications would then be considered by ETCC, Cabinet Committee and County Council.
- 4.3 During the process, minor non-material changes (e.g. changes related to grammar and clarity) may be needed, and it is proposed that the agreement to such changes be delegated to the Corporate Director for Growth, Environment & Transport in consultation with the Deputy Leader.

5 Revised Local Development Scheme

5.1 The Local Development Scheme sets out the County Council's programme for preparing minerals and waste planning documents. The current Local Development Scheme, which was adopted in December 2017 anticipated submission of the Plan to the Secretary of State following the pre-submission consultation in January 2019. This needs to be updated to reflect

the updated timetable. The revised timetable for the preparation of the Minerals Sites Plan and KMWLP Partial Review, to be included in the Scheme, is set out in the table below.

Stage	Dates
Second Call for Sites	November 2016 - January 2017
Minerals Sites Options and KMWLP Partial Review Consultation (Reg 18)	December 2017 – March 2018
Pre-Submission Plan Consultation (Reg 19)	December 2018 – February 2019
Submission	March/April 2019
Independent Examination Hearing	June/ July 2019
Inspector's Report	October 2019
Adoption	December 2019

6. Financial Implications

6.1 The costs of preparing the Kent Mineral Sites Plan Options and the early Partial Review of the MWLP are met from the Environment, Planning and Enforcement Division's budget.

7. Policy Framework

7.1 The Kent Mineral Sites Plan and the policies within the KMWLP itself support the County Council's corporate policies contained within the Council's Strategic Statement 'Increasing Opportunities, Improving Outcomes – Kent County Council's Strategic Statement 2015-2020'. The Minerals Sites Plan will support and facilitate sustainable growth in Kent's economy and support the creation of a high-quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.

8. Legal Implications

- 8.1 The County Council has a legal obligation under the Town and Country Planning Acts to prepare a statutory Development Plan for planning purposes(commonly known as the Local Plan) .
- 8.2 The County Council is also required by national planning policy to ensure that local plans promote sustainable minerals and waste development. The early partial review will play an important role in ensuring that minerals and waste development in Kent is in line with national planning policy.
- 8.3 There is an expectation by the Minister for Housing, Communities and Local Government that all planning authorities have an up to date local plan in place. Without an up to date adopted

plan, there is a risk that MHCLG will step in as the plan making authority, reducing local accountability.

9. Equalities implications

9.1 An equality impact assessment (EQIA) has been completed and no equality implications have been identified. A copy of the assessment is attached at **Appendix 8**. The earlier Local Plan work was accompanied by a separate EQIA.

10. Conclusion

- 10.1 The Town and Country Planning Acts requires the County Council to prepare a Development Plan setting out how mineral and waste planning matters will be considered in Kent. The KMWLP adopted in July 2016 sets out the overarching strategy and vision until 2030 and commits the County Council to preparing Mineral and Waste Sites Plans that allocate individual sites for development that align with the KMWLP strategy.
- 10.2 Preparation work for the Waste Sites Plan concluded that the waste capacity requirements for Kent had essentially been met and that a Waste Sites Plan is no longer justified. As a result, an early partial review of the KMWLP is required. Implementation of KMWLP policies concerning mineral and waste safeguarding has also identified that minor modifications are necessary to improve their effectiveness. The attached Pre-Submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 has been prepared to address changes proposed to the waste strategy and the safeguarding policies.
- 10.3 In respect of the Minerals Sites Plan, following a call for sites and site appraisal work, this report proposes a Pre-submission Draft of the Kent Minerals Sites Plan allocating sites considered suitable in principle for mineral development. Public consultation and views of technical consultees have informed both Draft Pre-submission Plans.
- 10.4 A decision to submit the Draft Plans for Examination to the Secretary of State is a matter for County Council. Once agreed the Draft Plans will be published to allow representations (known as Regulation 19 Consultation). The Draft Plans and any representations will then be submitted to the Secretary of State for independent examination.
- 10.5 An updated Local Development Scheme is proposed to reflect changes to the programme and timetable concerning preparation of the Mineral Sites Plan and the Early Partial Review.

11. Recommendation

The Environment and Transport Cabinet Committee is asked to:

- (i) consider and endorse, or make recommendations to the Cabinet Member responsible for the Minerals and Waste Local Plan on the proposed:
- (a) Pre-submission Draft of the Kent Mineral Sites Plan;
- (b) Pre- submission Draft of the Early Partial Review of the Kent Minerals and Waste Local Plan; and,

- (c) the updated Local Development Scheme (revised timetable) to reflect changes to the programme and timetable concerning preparation of the Local Plan work.
- (ii) note that the decision to approve the Pre-submission Drafts Plans for submission to the Secretary of State for independent examination is a matter for County Council;
- (iii) request the County Council to:
- (c) Approve and publish the Pre-Submission Drafts of the Kent Mineral Sites Plan and the Early Partial Review of the Kent Minerals and Waste Local Plan for a statutory period of representation and to submit the Draft Plans to the Secretary of State for independent examination; and,
- (d) delegate powers to the Corporate Director for Growth, Environment & Transport to approve any non-material changes to the Mineral Sites Plan and Early Partial Review of the Kent Minerals and Waste Local Plan in consultation with the Deputy Leader prior to their publication and during their examination.

12. Contact details

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Lead Director:

Katie Stewart - Director of Environment, Planning and Enforcement

Phone number: 03000 418827

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Appendices

Appendix 1:

Kent Mineral Sites Plan – Pre-Submission Draft 2018

Appendix 2:

Kent Mineral Sites Plan – Minerals Site Assessment Document 2018

Appendix 3:

Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 – Pre- Submission Draft 2018

Appendix 4:

Kent Minerals and Waste Local Plan 2013-30 - Updated Local Development Scheme – timescale 2018

Appendix 5

Partial Review of the Kent Minerals and Waste Local Plan 2013-30 – Summary of Issues Raised 2018

Appendix 6:

Sustainability Appraisal of the Kent MWLP Partial Review 2018

Appendix 7:

Sustainability Appraisal of the Kent Minerals Sites Plan 2018

Appendix 8:

Kent Minerals and Waste Local Plan 2013-30 Partial Review 2018 and Kent Minerals Sites Plan 2018 - Equality Impact Assessment

Background Documents

Kent Minerals and Waste Local Plan 2013-30

Site Identification and Selection Methodology 2018

Kent Minerals Sites Plan - Mineral Site Selection - Initial Assessment November 2017

Kent Minerals Sites Plan Options 2017 Consultation document

Soft Sand Topic Paper 2018

Sharp Sand and Gravel Topic Paper 2018

Kent County Council - Local Aggregate Assessment DRAFT 2018

Kent Minerals Sites Plan – Appraisal of Landscape and Visual - Axis 2018

Kent Minerals Sites Plan - Land Stability report - Axis 2018

<u>Topic Papers – Waste Assessment – BPP 2017</u>

Waste Evidence Topic Papers - 2018

BPP Consulting Kent Waste Needs Assessment 2018 Specifically:

- Non-Hazardous Waste Recovery Capacity Requirement, November 2018;
- Non-Hazardous Waste Recycling/Composting Capacity Requirement, November 2018;
- Hazardous Waste Needs Assessment, November 2018.

Scoping Report - Sustainability Appraisal of the Kent MWLP Partial Review

Scoping Report – Sustainability Appraisal of the Kent Minerals Sites Plan- Making Process

Habitats Regulation Assessment

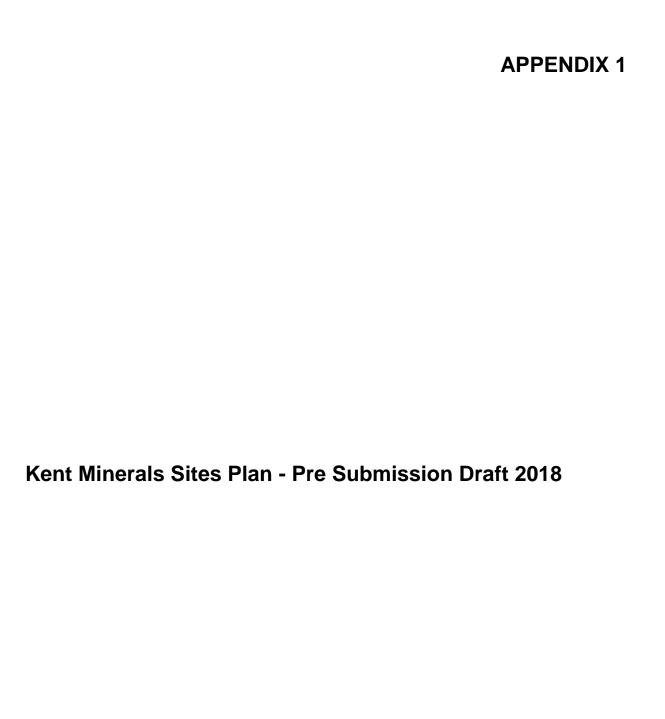
SFRA and Water Resource Reports (Available on Request)

Kent Minerals and Waste Local Plan 2013-30 Updated Local Development Scheme - 2017

Kent Minerals and Waste Local Plan 2013-30 - Equality Impact Assessment 2017

Statement of Community Involvement





December 2018

Kent Minerals Sites Plan - Pre Submission Draft 2018

An Invitation to Comment

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016. It sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. It does not allocate specific sites suitable for minerals and waste development except for two strategic sites - one for cement production (and related mineral reserves) at Holborough in the Medway Valley and one for hazardous waste disposal at Norwood Quarry on the Isle of Sheppey.

A Mineral Sites Plan is being prepared to allocate specific sites within Kent suitable in principle for mineral extraction in accordance with policy CSM 2 of the KMWLP. Once adopted, the document will form part of the Development Plan for Kent, along with the KMWLP, District and Borough Local Plans and any Neighbourhood Plans

A 'Call for Sites 'exercise was carried out between December 2016 and March 2017 which invited interested parties to submit details of sites that could meet the County's need for minerals. These were then assessed against an agreed phased methodology to determine which sites were suitable to be allocated in a Minerals Sites Plan and be subject to independent examination by an Inspector appointed by the Secretary of State. Following Initial Screening¹, 9 sites were identified as Mineral Site Options potential options. These 'Site Options'² were subject to public consultation in late 2017/early 2018. The views from this consultation³, along with further detailed technical assessment (DTA) work⁴, has informed which sites should be allocated for mineral development in the Mineral Sites Plan. The methodology for the Sites Plan work is set out in the Site Selection Methodology 2018.

This is the final stage in the preparation of the Mineral Sites Plan prior to the Plan's submission to the Secretary of State for examination. This document is the Pre-Submission Plan, published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. These documents are available for public inspection and representations are invited on the soundness and legality of the Plan in advance of submission to the Secretary of State for an Independent Examination in public. Ultimately the Inspector will report on the whether the Plan is 'sound' taking account of supporting evidence and representations received. A 'sound' Plan is one that is:

- 'Positively prepared';
- 'Justified';
- 'Effective'; and,
- Consistent with national policy.

The preparation of this Plan has involved considerable and ongoing engagement and collaboration with communities, local organisations and businesses. To ensure effective consideration of cross-boundary impacts that may be affected by the strategies and policies

¹ Screening was carried out in line with the County Councils Site Selection Methodology 2018.

² Kent Mineral Sites Plan Options Consultation September 2017.

³ See Options Consultation Report

⁴ See Kent Mineral Site Plan – Mineral Site Assessment 2018

in this Plan, it has also been prepared in cooperation with Kent's district and borough councils, neighbouring authorities and other Minerals and Waste Planning Authorities. This Plan is accompanied by a comprehensive evidence base including Habitats Regulations Assessment (HRA), a Sustainability Appraisal (SA) a Strategic Flood Risk Assessment (SFRA) and an Equalities Impact Assessment (EQIA).

The period for representations will run for xxxx weeks from xxxxx to xxxxx. The minimum statutory time period of six weeks has been extended to allow for the Christmas holiday.

You can make comments:

- Online at

- By email to mwlp@kent.gov.uk

- By post to: Kent County Council

Minerals and Waste Planning Policy

1st Floor, Invicta House

Maidstone Kent

ME14 1XX

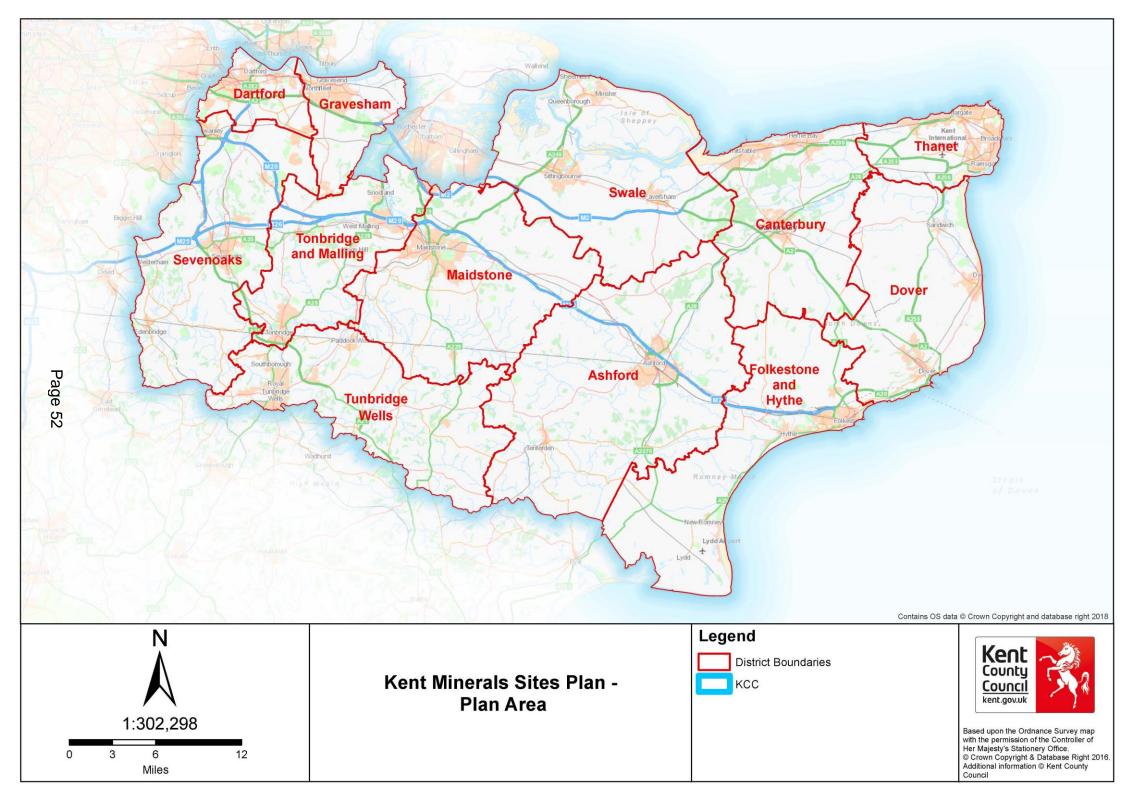
Kent Minerals Sites Plan - Pre Submission Draft 2018

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1. Introduction

- 1.1. Kent County Council has responsibility for the planning of future mineral supply for the county. Following the adoption of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP), this responsibility is being fulfilled by the preparation of a Kent Mineral Sites Plan (the Sites Plan). The plan area for this document is the administrative area of Kent, excluding Medway.
- 1.2. Kent contains a wide variety of mineral resources. Minerals are extracted for aggregate and non-aggregate markets. Aggregates are materials derived from sand and gravel deposits, soft (building) sands from the Folkestone Formation and crushed hard rock (Kentish Ragstone a limestone). They are used in the construction industry for building and maintenance purposes, including asphalt production in road building, concrete and mortar production for construction. Some aggregate minerals are also used for non-aggregate purposes, for example for beach feeding for flood defence purposes on parts of the coast line. Kent also has non-aggregate minerals, they include clay, brickearth, chalk (for construction/engineering and agricultural lime applications) and building stones (Kentish Ragstone, and extensive deposits of various sandstones that have been historically extracted). There also are reserves of industrial silica sand and brick clay within the county. However, the most significant minerals produced in the county are sharp sand and gravel, soft sand (building) and hard crushed rock (Kentish Ragstone).
- 1.3. The Sites Plan provides the spatial detail for meeting requirements for sharp sand and gravel and for soft sand in accordance with policy CSM2 of the Kent Minerals and Waste Local Plan 2013-30 which the authority adopted in July 2016, following an Independent Examination in 2015. The Sites Plan identifies potential locations for extraction of sharp sand and gravel and of soft sand, providing communities and the minerals industry with greater certainty about where minerals development may take place within Kent and the criteria that will need to be met.
- 1.4. Once adopted, the Kent Mineral Sites Plan will replace the currently saved Policy CA6 of the Kent Minerals and Waste Local Plan: Construction Aggregates 1993.



2 The Policy Context

Kent Minerals and Waste Local Plan

- 2.1 The adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP) is part of the Development Plan for planning purposes. It sets out the overarching framework for the strategy and planning policies for sustainable minerals extraction, importation and recycling, and the management of all waste streams that are generated in Kent, together with their spatial implications. This includes consideration of the economic, social and environmental aspects of strategic minerals and waste planning within the county.
- 2.2 Chapter 3 of the KMWLP sets out the vision for mineral development in Kent and chapter 4 sets out 6 objectives to support this vision. Chapter 5 sets out the spatial strategy for meeting the need for minerals, identifying in general terms how much mineral will be provided over the Plan period and includes policies related to the delivery strategy for minerals (CSM policies) and Chapter 7 includes the development management policies (DM policies) which seeks to ensure that minerals development does not have unacceptable impacts.
- 2.3 Chapter 5 expects that the Mineral Sites Plan will develop the delivery strategy by allocating specific sites for mineral development in order to provide a level of certainty to local residents, the minerals industry, land owners and other interested stakeholders as to where minerals development is likely to take place.
- 2.4 Some work was previously undertaken on preparation of the Sites Plans that led to a Preferred Options Consultation (for waste and minerals) in May 2012. This work was not taken forward and to enable a more up-to-date appraisal of site suitability and deliverability it was considered necessary to undertake a second 'Call for Sites' exercise. This commenced in late 2016, continuing into 2017.
- 2.5 Policy CSM2 of the KMWLP sets out the policy context for the Supply of Land-won Minerals in Kent. It states that "Mineral working will be granted planning permission at sites identified in a Sites Plan, subject to meeting the requirements set out in the relevant site schedule in the Mineral Sites Plan and the Development Plan".

Preparation of the Minerals Sites Plan - Matters Considered

- 2.6 For a site to be allocated in the Sites Plan, Policy CSM2 requires site allocations to meet the following criteria:
 - There has to be a requirement for the mineral;
 - > consistency with relevant development management criteria:
 - consistency with relevant policies in district local and neighbourhood plans;
 - assessment based on strategic environmental information and Habitat Regulation Assessment;
 - > Deliverability; and
 - consistency with other relevant national planning policy and guidance.

- 2.7 In addition, the policy states that sites will generally be where viable mineral resources are known to exist, where landowners are supportive of mineral development taking place and where the Mineral Planning Authority considers that planning applications are likely to be acceptable in principle in planning terms. Discussion of some of the matters to be taken into account when preparing the Mineral Sites Plan is set out below
- 2.8 District and Borough Councils in Kent are preparing their own Local Plans. Care has been taken to avoid any material conflict between the Mineral Sites Plan and adopted Local Plans through consultation and engagement during the Local Plan formulation process. Local Plans produced by the County Council and the District and Borough Councils, along with any Neighbourhood Plans form the Development Plan.
- 2.9 Local District and Borough council input has been sought on the site selection process. The outcomes of meetings held with each local council fed into the overall site screening process, and their comments were again sought prior to detailed technical assessments being undertaken on the Site Options
- 2.10 Minerals and Waste Local Plans have been adopted and are also being prepared by the minerals and waste planning authorities bordering the Sites Plan area and these have been taken into account. In accordance with the Duty to Cooperate, there has been ongoing discussion and consultation with neighbouring mineral planning authorities, especially those within the South East Region in respect of need considerations. The County Council is a member of the South East Aggregate Working Party, which represents the Mineral Planning Authorities in the South East and industry representatives. The work of this Group has also informed the Sites Plan work. The County Council will continue to work closely with adjoining authorities on strategic cross boundary matters.
- 2.11 In accordance with the requirements of the Habitats Directive 1992, the Site Plan has been subject to Habitats Regulations Assessment (HRA). This work has helped to inform which sites should be included for allocation within the Site Plan. Related consultation has taken place with Natural England regarding the impact on international designations. Full details of the HRA assessment are available on the Council's website.
- 2.12 Post publication of the Site Options for consultation at Regulation 18 stage, the County Council attended a number of public meeting hosted by Parish and Town Councils to explain the Site Plan work and seek views on the proposals. The views received have informed the Site Plan work.
- 2.13 The Planning and Compulsory Purchase Act 2004 sets out the legislative framework for the preparation of Local Plans whilst European and National policies and strategies provide guidance on their content. The Minerals Sites Plan must be consistent with European and National policies. This Pre-Submission Draft Mineral Sites Plan
 - has been produced within the context of relevant Plans, Programmes and Directives which were also instrumental in shaping the Minerals Strategy 2014. The Sites Plan has also been prepared in accordance with the National Planning Policy Framework (NPPF) 2018 and National Planning Practice Guidance (NPPG) 2014 for Minerals.

- 2.14 It should be noted that the site allocations do not equate to the grant of planning permission. Any proposal for the development of an allocated site will need to secure planning consent, and satisfy the requirements of the development plan and planning policy considerations at that time.
- 2.15 Development of the allocations of the Mineral Sites Plan, and any other mineral developments, are subject to all the relevant policies, particularly the development management policies of the Kent Minerals and Waste Local Plan 2013-30, along with other local plans and relevant national policies.

3 Provision of Mineral Sites

3.1 The Mineral Sites Plan proposes sites for the extraction of soft sand, and sharp sand and gravel. It is considered that these allocations, in conjunction with current permitted reserves and the criteria based approach to the provision of aggregates established in Policy CSM2 of the adopted KMWLP, will provide sufficient minerals during the Minerals Sites Plan period for the identified soft sand requirements and make an effective contribution to the supply of land-won sharp sand and gravel.

Sharp Sand and Gravel

- 3.2 Policy CSM 2 of the adopted Kent Minerals and Waste Local Plan 2013-30, in compliance with national policy, commits the County Council to make provision for at least a 7 year landbank for land-won sharp sands and gravel based on the current agreed local annual supply requirement for Kent while resources allow.
- 3.3 The local annual supply requirement is established annually through the Local Aggregates Assessment (LAA) process, and has been taken as the average of the previous 10 years of sales and projected over the anticipated Mineral Sites Plan Period (2019-2030) including provision for an at least 7 year landbank to be available at the end of this Plan period.

The supply of locally extracted sand and gravel will be sourced from:

- Existing permitted sites
- New sites, including extensions, as identified in the Mineral Sites Plan, and
- Other new sites not identified in the Mineral Sites Plan, deemed as acceptable sustainable mineral development in accordance with local planning policy and all material planning considerations including national planning policy
- 3.4 Based on 2014 data, the KMWLP identified a required provision over the life of the plan period of 10.8mt of sharp sands and gravel and at least 7 years supply (5.46mt). Since this time, permitted reserves have increased (due to current reserves being reestimated), and the 10 year sales average has decreased. Therefore, a new requirement⁵ has been calculated as shown in Figure 1.

-

⁵ See Sharp Sand and Gravel Topic Paper 2018

Figure 1 - Revised Sharp Sand and Gravel Site Plan Requirements

10 year average figure x Years covered by the Plan (18 years, 2019 to 2030 plus 7 year landbank) - Existing Permitted Reserves (estimated when Plan starts in our case 2019) = Requirement tonnage to be provided over the Plan period

Estimated permitted reserves have been calculated as follows:

Reserves as of end of 2017 = 3.69 Current 10-year sales average=0.472mt

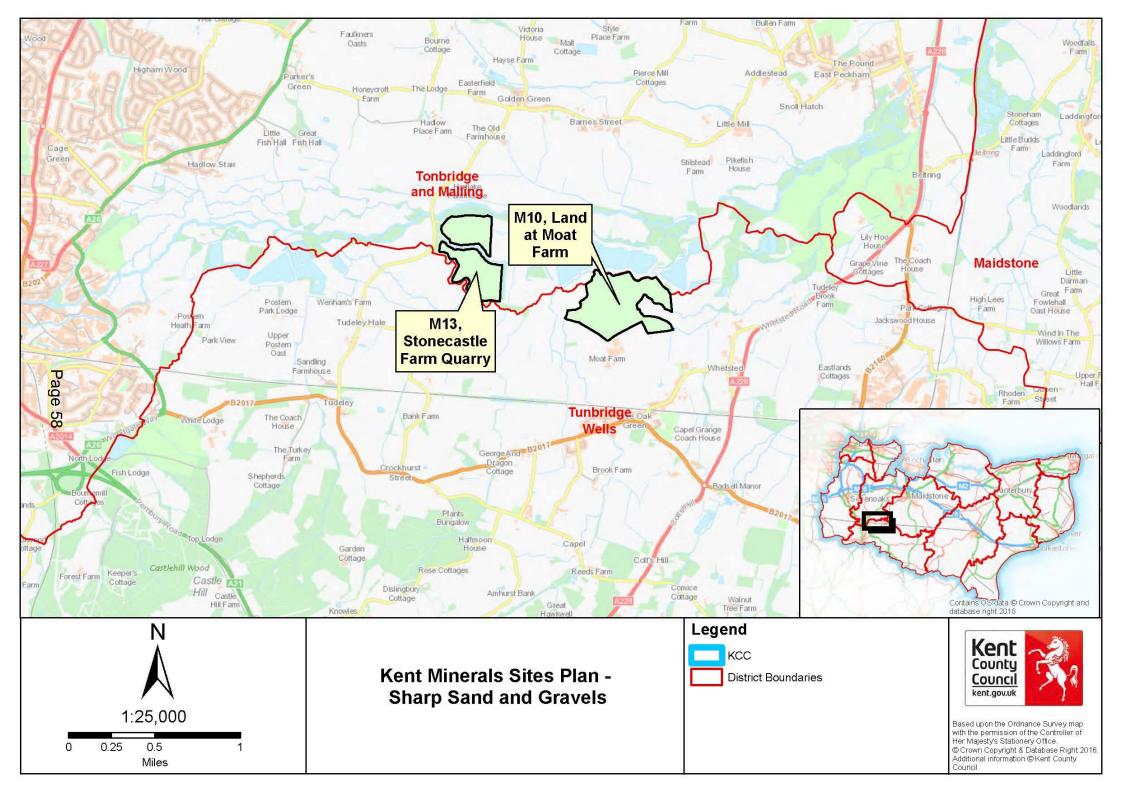
Available reserves by the end 2019 would be reduced by 2 years equivalent extraction (during 2018 and 2019 at the current 10-year sales average rate)

Available reserves at end 2019 = 3.69mt minus (2 x 0.472mt) = 2.746 mt

Therefore:

 $(0.472 \times 18) - 2.746 = 5.75$ mt overall Plan requirement

- 3.5 Having assessed the sharp sand and gravel sites that were promoted through the 'call for sites' in accordance with planning policy, two sites are allocated to contribute to the steady and adequate supply of sharp sands and gravel, subject to demonstrating at planning application stage compliance with the development management criteria set out below and national and local planning policy:
 - ➤ Stonecastle Farm Quarry Extensions, Hadlow (M13) an extension to the existing quarry (total yield of 1,000,000 tonnes), and
 - ➤ Land at Moat Farm, Five Oak Green (M10) a proposed new quarry (total yield of 1,500,000 tonnes)
- 3.6 Details of the sites and the development criteria are shown on the map Kent Minerals Sites Plan Sharp Sand and Gravels and in Appendix 1.
- 3.7 The total yield of the sites suitable for allocation is 2.5mt. This results in a deficit of 3.25mt over the Plan period. Therefore, Kent will continue to be increasingly dependent on alternative sources to meet the demand for sharp sand and gravel. This will likely entail increased importation of sand and gravel via wharves and railheads, mainly from marine dredged materials from the East English Channel and North Sea (see LAA2018). Railheads may further distribute this material and may also have some potential to introduce land-won supply from other areas. Recycled and secondary aggregates will also contribute to overall aggregate needs but cannot be used as a substitute for all applications and is seen as making a contribution to overall supply compared to primary aggregates.
- 3.8 Any proposal for the development of either of the above allocations must address the development management considerations set out for each site in Appendix 1, in addition to any other matters relevant to the development of each proposed allocation demonstrating that any unacceptable impacts will be mitigated to the satisfaction of the Mineral Planning Authority.



Soft Sand

- 3.9 Policy CSM 2 of the adopted Kent Minerals and Waste Local Plan 2013-30, in compliance with national policy, commits the County Council to make the provision of at least a 7-year landbank for soft sand based on the current agreed local annual supply requirement for Kent.
- 3.10 The local annual supply requirement is established annually through the Local Aggregates Assessment (LAA) process, and has been taken as the average of the previous 10-years of sales and projected over the anticipated Mineral Sites Plan Period (2019-2030) including provision for an at least 7-year landbank to be available at the end of this Plan period
- 3.11 The supply of locally extracted soft sand will be sourced from:
 - > Existing permitted sites
 - A new site, as identified in the Mineral Sites Plan, and
 - Other new sites not identified in the Mineral Sites Plan, deemed as acceptable sustainable mineral development in accordance with local planning policy and all material planning considerations including national planning policy
- 3.12 Requirements in the adopted Kent Minerals and Waste Local Plan (KMWLP) suggest a 5 million tonne shortfall to be met from sites identified in the Kent Mineral Sites Plan. This shortfall was based on 2014 data and assumed the need to plan for a 24-year land bank, however, the Mineral Sites Plan period is shorter (the Plan period of 11 years (2019 to 30) plus 7 years at the end of the Plan period giving 18 years in total to plan for). More recent calculations based on data in the LAA2018 regarding supply in the form of sales and available reserves to meet that demand over the Plan period, taken together with an 18-year landbank suggest the shortfall is now 2.5mt⁶. See Figure 2.

-

⁶ See Soft Sand Topic Paper 2018

Figure 2 - Revised Soft Sand Site Plan Requirements

10-year average figure x Years covered by the plan (18 years, 2019 to 2030 plus 7 year landbank) - Existing Permitted Reserves (estimated when the plan period commences in our case 2019) = Requirement tonnage to be provided over the Sites Plan period

Estimated permitted reserves have been calculated as follows:

Reserves as of end of 2017 = 8.85

Available reserves by the end 2019 would be reduced by 2 years equivalent extraction (using the 10-year sales average of 0.568mt for 2018 and 2019 extraction)

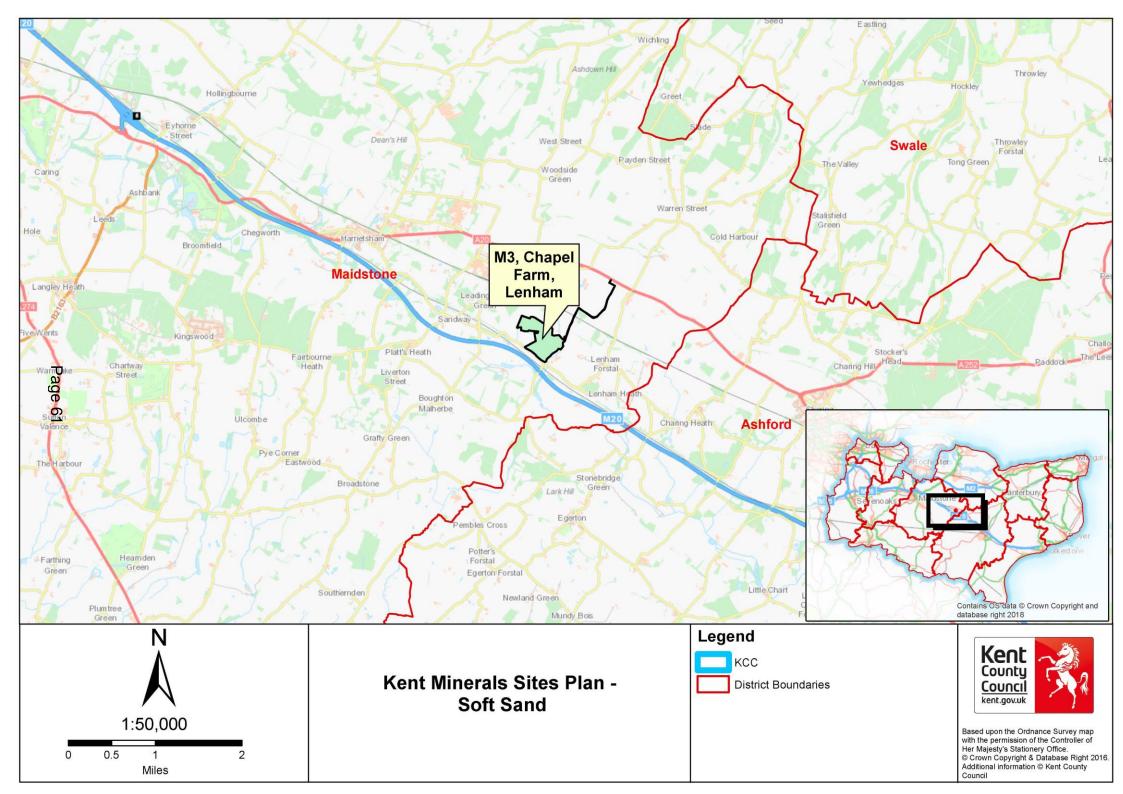
Available reserves at end 2019 = 8.85 - (2 x 0.568mt) = 7.714mt

Therefore:

 $(0.568 \times 18) - 7.714 =$ Overall Plan of 2.51mt requirement (rounded to 2.5mt)

- 3.13 Having assessed the soft sand sites that were promoted through the 'call for sites' in accordance with planning policy, one site is allocated to contribute to the steady and adequate supply of soft sand, subject to demonstrating at planning application stage compliance with the development management criteria set out below and national and local planning policy:
 - ➤ Chapel Farm (West), Lenham (M3⁷) a proposed new quarry (total yield 3,200,000 tonnes)
- 3.14 Details of the site and the development criteria are shown on the map Kent Minerals Sites Plan Soft Sand and in Appendix 1.
- 3.15 Any proposal for the development of the above allocation must address the development management considerations set out for the site in Appendix 1, in addition to any other planning considerations relevant to the development and that any adverse impacts will be mitigated to the satisfaction of the Mineral Planning Authority.
- 3.16 The yield of the Chapel Farm West site is 3.2mt. This amount can adequately meet the objectively assessed need for soft sand over the life of the Plan and will meet the requirement for a steady and adequate supply of soft sand in accordance with Policy CSM 2 of the KMWLP.
- 3.17 There will also be a surplus of 0.7mt of soft sand available to contribute to the wider regional need for this material.

⁷ As amended to exclude the eastern parcel 2018



Appendix 1 - Kent Minerals Site Plan - Site Allocations

Background

This appendix contains the Development Management Criteria for each of the allocated mineral sites. These set out the key, site specific information relating to potential constraints, opportunities and issues to be addressed at the planning application stage.

The Kent Minerals Sites Plan is an integral part of, the KMWLP. The two documents should be read together, and the policies of the KMWLP, particularly the development management policies (Chapter 7) will be applied to proposals for development on sites allocated in the Kent Minerals Site Plan.

Development Management Criteria

The Development Management criteria are specific matters to be taken into account in relation to the development of each site. They also include guidance on restoration objectives. The information set out in criteria should not be considered as exhaustive. These criteria are based on an assessment of the sites at the time this Plan was prepared and if circumstances change or new information becomes available prior to sites coming forward through a planning application, this will also need to be taken into account in decision making.

As a result of the issues set out in the Development Management Criteria, and depending on the precise nature of the development proposed, mitigation measures are likely to be required in order to prevent adverse impacts occurring. If adverse impacts are unavoidable and it is considered that they are an acceptable part of the development proposed, compensation measures may be required.

Sharp Sand

Extensions to Stonecastle Farm Quarry, Hadlow/Whetsted

Site Location: Hadlow, Tonbridge

Grid reference: Eastings 563335 Northings 146908

District/Borough Council: Tonbridge and Malling (Access is within Tunbridge Wells)

Parish: Hadlow

Site Area: 28 hectares

Estimated Mineral Reserve: 1,000,000 tonnes

Existing Land Use: Agriculture

Proposed Development: Extraction of sharp sands and gravel (Sub-alluvial River Terrace

Deposits)

Proposed Restoration: Reedbeds and lakes

Development Management Criteria:

The Stonecastle Farm Quarry Extension site is acceptable in principle for mineral development, subject to compliance with the development management considerations, with particular reference to:

Transport

- A detailed transport assessment to demonstrate compliance with KMWLP Policy DM13.
- All quarry traffic to utilise the existing Stonecastle Quarry access onto Whetsted Road, and only turn left when exiting the site.
- The site shall only be worked sequentially to the permitted phases at Stonecastle Farm Quarry or the Moat Farm Quarry (should planning permission be granted for this latter site). To avoid unacceptable impacts on the local highway network, the Stonecastle Farm Extension (M13), the Moat Farm Site (M10) and the permitted Stonecastle Farm Quarry shall not be worked concurrently.

Water Resources

- A minimum 16 metre buffer will need to be provided between extraction and nearby watercourses.
- Demonstration that the site will have no adverse impacts on hydrology or hydrogeology. This should be undertaken in liaison with South East Water and the Environment Agency and will need to include (amongst other matters) the following:
 - The risk of pollutants entering the restored open lakes
 - A Hydrometric Monitoring Strategy; the results of this should be regularly reviewed and the conceptual model of the site updated as required

- Risk to derogation of the activities subject to Abstraction Licences in the vicinity of the site.
- Compliance with the Environment Agency's approach to the management and protection of groundwater as outlined within their Groundwater Protection Position Statements and take all measures and precautions necessary to avoid deterioration in the quality of groundwater below the site.
- ➤ The restoration plan will need to have reference to the proposed lakes and their interface with the nearby watercourses in accordance with Environment Agency advice. It must also include evidence to demonstrate how the integrity of nearby watercourses will be retained.
- The two abstraction licences within the vicinity of the site will need to be taken into account.
- Dewatering techniques must not be used that would impact local water resources.
- Any application will need to be accompanied by a detailed flood risk assessment.

Amenity

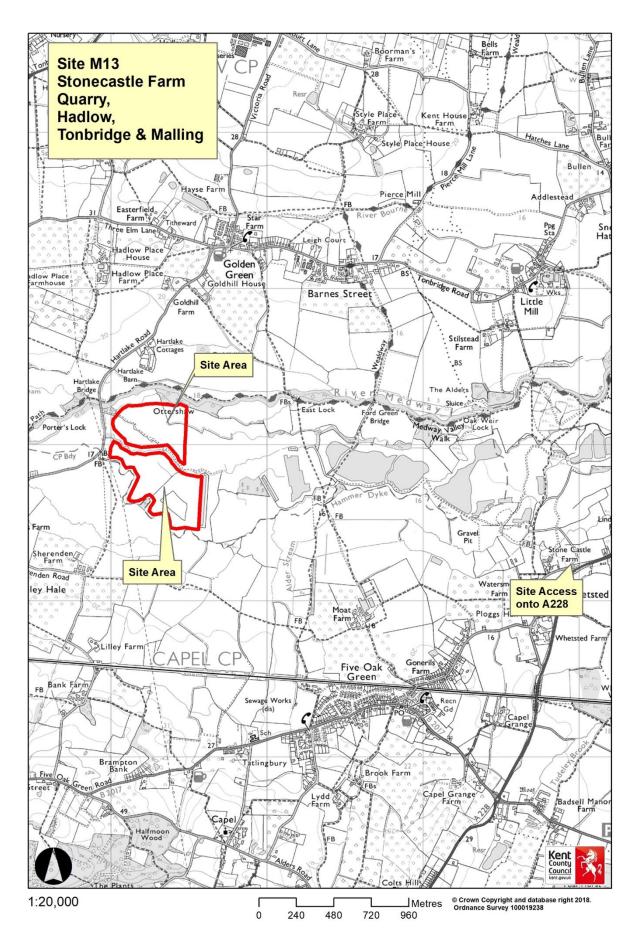
- A lighting, noise, dust and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance).
- Compliance with policy DM11 of the Kent Minerals and Waste Local Plan in respect of health and amenity.

Biodiversity

- A detailed ecological appraisal setting out any mitigation measures needed to ensure there are no unacceptable impacts on Kent's biodiversity assets
- ➤ Detailed restoration proposals will need to demonstrate that the potential loss of the BAP habitat deciduous woodland is offset by replacement woodland provision within the proposed restoration plan. This should include a range of trees and shrub sizes to create a vertical design element to the planting.
- Any operations should exclude the Ancient Woodland and a suitable buffer should be employed as to not impact on the designation directly or indirectly
- Restoration scheme should incorporate additional woodland planting where possible, including native evergreen species along the western and southern boundaries of the proposed quarry extension site.
- Suitable buffer zones and mitigation to be proposed to mitigate impacts to Local Wildlife Site TM20.
- > The developer to appropriately manage the Nuttall's pondweed and Crassula in the area
- The need for compensatory replacement habitat should be considered.

Heritage

- Further assessment of the potential impact of proposals on the historic landscape and surviving features is necessary and should account of the historic landscape should be taken during works and in later site landscaping and restoration programme.
- The impact of proposals upon the Listed Buildings should be fully assessed and mitigation measures undertaken to avoid impact on their setting.
- Any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of such remains.



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Moat Farm, Capel, Tonbridge

Site Location: Five Oak Green, Capel, Tonbridge

Grid reference: Eastings 564578 Northings 146400

District/Borough Council: Tonbridge and Malling

Parish: Capel

Site Area: 38.2 hectares

Estimated Mineral Reserve: 1,500,000 tonnes

Existing Land Use: Agriculture

Proposed Development: Extraction of sharp sands and gravel (Sub-alluvial River Terrace

Deposits)

Proposed Restoration: Phased wetland restoration

Development Management Criteria:

The Moat Farm site is acceptable in principle for mineral development, subject to compliance with the development management considerations, with particular reference to:

Transport

- A detailed transport assessment to demonstrate compliance with KMWLP Policy DM13.
- Mineral must be removed from the site via the Stonecastle Farm site to the north such that access onto the highway network is achieved using the existing and approved access for the Stonecastle Farm Quarry.
- The site shall only be worked sequentially to the permitted phases at Stonecastle Farm Quarry or the Moat Farm Quarry (should planning permission be granted for this latter site).
- ➤ To avoid unacceptable impacts on the local highway network, the Stonecastle Farm Extension, the Moat Farm Site and the permitted Stonecastle Farm Quarry shall not be worked concurrently.
- Proposals for the diversion for PROW will be required which show how connectivity of the surrounding PROW network will not be lost.

Water Resources

- ➤ A 16 metre buffer should be provided between extraction and nearby watercourses to alleviate flood risk in the area. Furthermore, should the Alder Stream require diversion, this should be subject to EA approval and hydraulic modelling must be undertaken to inform the diversion route and the potential impact on flood risk elsewhere.
- Any restoration works should not include raising the ground levels over existing levels as this will have an adverse impact on flood risk. Wetland restoration is preferable.

Biodiversity

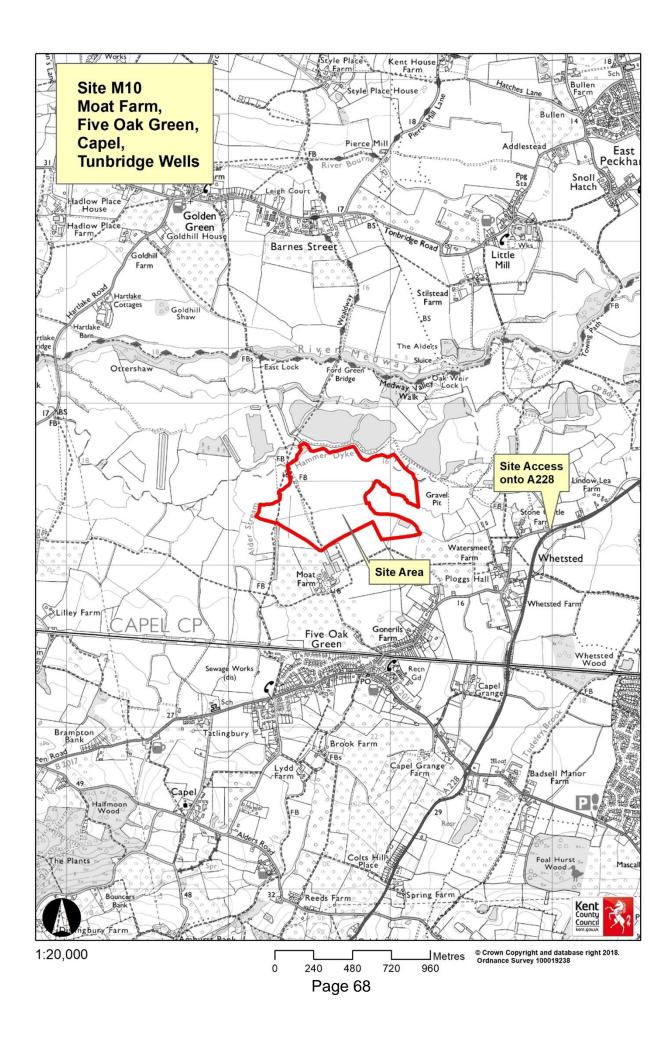
- Any proposal would need to be accompanied by a detailed ecological appraisal setting out any mitigation measures needed to ensure there are no unacceptable impacts on Kent's biodiversity assets
- Any operations should exclude the Ancient Woodland and a suitable buffer should be employed as to not impact on the designation directly or indirectly.

Health and Amenity

- Compliance with policy DM11 of the Kent Minerals and Waste Local Plan in respect of health and amenity.
- A lighting, noise, dust, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance).

Heritage

There is potential for Palaeolithic remains within the site. Therefore, any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of such remains.



Soft Sand

M3: Chapel Farm, Lenham (Western Site)

Site Location: Lenham, Maidstone

Grid reference: Eastings 590223 Northings 150704

District/Borough Council: Maidstone

Parish: Lenham

Site Area: 35.4 hectares

Estimated Mineral Reserve: 3,200,000 tonnes

Existing Land Use: Agriculture

Proposed Development: Extraction of soft sand (Sandstone: Folkestone Formation)

Proposed Restoration: Lower level agriculture

Development Management Criteria:

The Chapel Farm, Lenham (Western Site) (M10) is acceptable in principle for mineral development, subject to compliance with the development management considerations, with particular reference to:

Biodiversity

- At least a 15 metre buffer to be maintained around the Ancient Woodland at all times
- ➤ Lenham Quarry SSSI is approximately 800m from the site and Hart Hill SSSI is 2.5km away; both are designated for their geological interest. Lenham Heath & Chilston Park and Bull Heath Pit Local Wildlife Sites (LWS) are adjacent to the proposed site. Evidence to be submitted with any planning application to confirm that the LWS and SSSIs will not be adversely impacted
- Woodland copse to the north-west corner of the site must be maintained

Landscape

Detailed information setting out proposed mitigation of visual impacts and demonstrating that the setting of the Kent Downs AONB will not be adversely impacted

Heritage

➤ Nearby listed buildings include Royton Manor (Grade II*) and Chapel Mill (II), Vine House (II) and Mount Castle Farm Cottage (II). Consideration and mitigation of impacts on heritage assets including listed buildings is required.

Water Resources

- Any application will need to be accompanied by an EIA with particular emphasis on the site's relationship and impact on the Great Stour
- Appropriate mitigation measures and monitoring will need to be implemented as per the request of the Environment Agency, to demonstrate the following:
 - o Hydraulic continuity between those reaches of the Great Stour and associated tributaries, if proven to be in part dependent on groundwater baseflow originating from the adjoining aquifer (Folkestone Formation).
 - The hydraulic integrity of the river is not compromised. In particular, the proposed plans will need to recognise the function of the foremost transient reaches of the Great Stour, which are dependent on both chalk escarpment seepage and surface runoff contributions, where underlain by Gault Clay to the immediate north of Chapel Farm. Any submission will need to account for this 'contribution', and the plans cannot allow the Great Stour to become hydraulically 'isolated' from its headwaters, irrespective of whether those watercourses are quantified as ephemeral.
 - o The underlining Sandgate Formation is not compromised, especially if the Formation is shown to be acting as an aquiclude at Chapel Farm, and within the immediate vicinity. Such a response is required to protect the Hythe Formation, which is classified as a major water resources aguifer unit.

Transport and Access

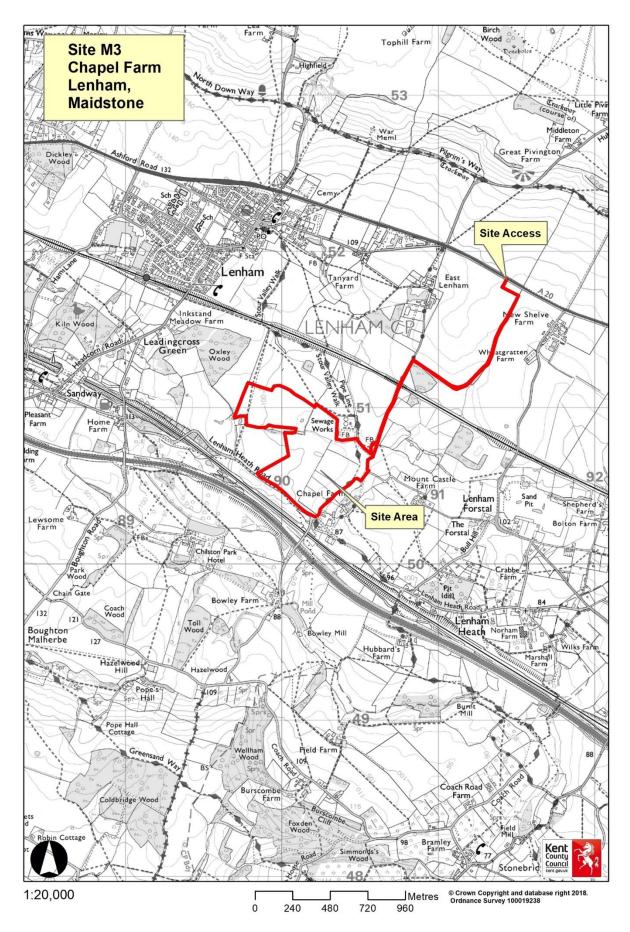
- A detailed transport assessment to demonstrate compliance with KMWLP Policy DM13.
- The Transport Assessment should consider ability to access the site via rail, impacts on the A20 and the Maidstone AQMA and show how any potential adverse impacts on this AQMA will be mitigated.

Utilities

- ➤ Demonstration that sensitive receptors such as sewage lines, electricity pylons and the railway lines will not be affected by land instability caused by the development.
- ➤ The functioning of the Lenham WWTW and other sewerage infrastructure must not be adversely impacted

Health and Amenity

- Compliance with policy DM11 of the Kent Minerals and Waste Local Plan in respect of health and amenity.
- A lighting, noise, dust, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance).



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Kent Mineral Sites Plan

Mineral Site Assessment 2018

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First Draft for Publication

V 1

November 2018

1 Introduction

The adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP) is part of the Development Plan for planning purposes. It sets out the overarching framework for the strategy and planning policies for sustainable minerals extraction, importation and recycling, and the management of all waste streams that are generated in Kent, together with their spatial implications. This includes consideration of the economic, social and environmental aspects of strategic minerals and waste planning within the county. The Plan was formally adopted by the County Council in July 2016.

Whilst the adopted Plan provides the strategy and policy framework for minerals and waste proposals to be considered against, it does not allocate specific sites suitable for development (except for two strategic sites for cement production at Holborough in the Medway Valley, and hazardous waste disposal at Norwood Quarry on the Isle of Sheppey). The adopted KMWLP identifies that suitable sites will be allocated in separate subsequent Kent Minerals and Waste Sites Plans. Some work was previously undertaken on preparation of the Sites Plans that led to a Preferred Options Consultation (for waste and minerals) in May 2012. To enable a more up-to-date appraisal of site suitability and deliverability it was considered necessary to undertake a second 'Call for Sites' exercise and this commenced in late 2016, continuing into 2017. To inform the process of site selection the County Council also published a 'living draft' methodology for site selection which was subject to public consultation. The Site Plan work has followed the methodology as set out in the Kent Mineral Sites Plan - Methodology for Site Selection 2018.

During 2017 a re-assessment of waste management capacity was undertaken that identified that there is no need for the allocation of specific waste sites in a separate Waste Sites Plan and so this document is concerned solely with the identification of mineral sites.

This document sets out a summary of the methodology, the initial assessment conclusions and the detailed technical assessment conclusions for those sites promoted following the second Call for Sites. An earlier document, Site Selection Methodology Initial Screening RAG Scores v 2 2017 set out the position at the initial screening assessment stage. The details are reproduced in this document for ease of reference.

2 Site Selection Methodology

The County Council proposes a robust site selection process to determine which sites should be progressed to allocations for minerals development in the Minerals Sites Plan. This was originally set out in the living draft Site Selection Methodology (published in October 2016) and included checking alignment with the scope of the Sites Plans, initial screening (as detailed in this document), identification of reasonable alternatives and detailed technical assessments.

In undertaking the work, a change was introduced into the assessment process which relates to the provision of an early opportunity for public engagement on potential sites. It is considered that there is benefit in seeking early views from stakeholders as this provides an opportunity for local knowledge and specialist information held by stakeholders to be considered as the plan emerges. As such the views of stakeholders will benefit the subsequent detailed technical assessment stage. Public engagement is also generally considered to be an important part of the plan-making process. The revised living draft Site Selection Methodology (revised November 2017) included alignment with the objectives of the adopted KMWLP and scope of the sites plan, initial screening, consultation on the site options and detailed technical assessment of the site options.

Stage 1 – Alignment with the objectives of the adopted KMWLP and scope of the Sites Plan

Those sites not falling within the scope of the adopted KWMLP, and modifications proposed by the partial review, which do not identify the need for the allocation of such a site, were eliminated at this stage. These sites are listed in Section 4 of this report.

Stage 2 - Initial Screening

At the initial screening stage, it was considered beneficial to consider all sites that had been promoted through the Call for Sites which were in alignment with the objectives of the KMWLP and the scope of the Sites Plan. This has provided comparable information for all promoted sites, should it be required at a later stage in the plan making process.

This initial screening of the sites utilises a refined 'traffic light' system based on a Red, Red-Amber, Amber, Amber-Green and Green (RAG) scoring methodology (See Table 1) to determine which sites will be published for consultation and go forward to the Detailed Technical Assessment stage. The RAG process acts as a scoping stage to highlight sites which might cause significant impacts, alone or in combination. It is primarily a desk-based procedure, supported by site visits.

Each site was RAG assessed against the following criteria:

- Landscape designations and potential visual impacts upon such designations
- Nature conservation interests and geodiversity
- Historic environment;
- Green Belt
- Water environment including flooding;

- Air quality;
- Soil quality;
- Public Rights of Way (PRoW);
- Transport (including access);
- Services and utilities;
- Health and Amenity i.e. noise, dust, odour, vibration impacts etc.
- Cumulative impacts; and
- Airport safeguarding

Table 1: Summary of the General RAG Assessment Methodology

Sensitivity Score	Description	Possible Mitigation
RED	The impact or issue is so severe that it would be unlikely to be adequately mitigated and no evidence has been provided on the potential mitigation and/or, in the case of sites within AONB existence of any relevant exceptional circumstance demonstrating it to be in the public interest. It is considered that the site is unlikely to be able to proceed	Mitigation in order to make the site acceptable is unlikely
RED- AMBER	There is a major impact or issue which may be made acceptable by mitigation	Likely to require high levels of mitigation in order to make the site acceptable
AMBER	There is a moderate impact or issue which may be made acceptable by mitigation	Likely to require medium levels of mitigation in order to make the site acceptable
GREEN- AMBER	There is a minor impact or issue which may be made acceptable by mitigation	Likely to require low levels of mitigation in order to make the site acceptable
GREEN	There are no impacts or issues relating to the criteria being assessed that require mitigation	Likely to require negligible to no mitigation in order to make the site acceptable

The way in which the RAG score is applied to each assessment criteria is detailed in the RAG Sensitivity Scoring Criteria, as appended at Appendix 1. In practice, the degree to which individual sites score on the Amber, Amber-Green and Green spectrum will determine the more sustainable solutions likely to progress to the next stage, consultation on the site options. Sites that received a Red score in the assessment were more likely to be ruled out at Stage 2 on the basis that they raise issue(s) of such severity that they are unlikely to be able to be adequately mitigated. This assessment process does not, however, automatically exclude sites that are assessed as red-amber from Stages 3 and 4, on the basis that suitable mitigation may be achievable. However, where a site scores Red-Amber against a number of criteria it was considered that it was less likely to progress to the next stages as it is more likely that the overall impacts and extent of mitigation required to make the site acceptable is so great that it would be likely to be undeliverable. The RAG scoring methodology is therefore intended to provide an 'indication' of a site's suitability or unsuitability.

Section 3 of this report details the RAG assessment for the sites that were promoted to the County Council as a consequence of the 'Call for Sites' exercise and not eliminated at Stage 1 above - alignment with the Plan.

Stage 3 - Consultation on Options

The sites which represented potentially sustainable options for minerals developments were identified via the RAG initial screening and went forward to Stage 3 as the Options for Consultation. These were set out in the Kent Minerals and Waste Local Plan 2013-30 Mineral Sites Plan Options Consultation Document November 2017. The document and supporting evidence were subject to public consultation between December 2017 and March 2018. Views were sought from a variety of stakeholder interests, including an early view from local communities in the vicinity of the sites. The views received have been taken into consideration in the Detailed Technical assessment phase. This work has also informed the sustainability appraisal and Habitat Regulation Assessment.

In addition to the RAG considerations, for a site to be considered as a Mineral Site Option it also had to:

- Align with the Objectives of the KMWLP (Stage1 above);
- Be justified
- Be deliverable

Stage 4 - Detailed Technical Assessment to Identify the Preferred Options for allocation in Mineral Sites Plan

The site options which were identified as potentially suitable from the Initial Screening and RAG assessment work were subject to more rigorous detailed technical assessment. As appropriate, this included assessment in respect of a range of environmental impacts including landscape and visual impact, amenity, highways and transportation, biodiversity, historic environment, water resources and flood risk, impact upon Public rights of way land stability and need. As appropriate it also included assessment in respect of:

- Habitat Regulations
- Green Belt
- Requirements of National Planning Policy and Guidance
- The Kent Minerals and Waste Local Plan 2013-30

Where appropriate, additional information was provided by the promoter to aid the assessment process and consider issues raised as a result of public consultation or by technical consultees. The Detailed Technical assessment stage of the work has informed the Plan's Sustainability Appraisal.

In addition, to the above technical assessments, to ensure that the Sites Plan work is planning for sufficient requirements, the Detailed Technical Assessment stage of the work has included a review of the soft sand and sharp sand and gravel requirements for aggregates to be provided for in the Mineral Site Plan. Policy CSM2 of the KMWLP requires the Site Plan to allocate sites for soft sand and for sharp sand and gravel based upon the most recent calculations of requirements set out in the Local Aggregate Assessment. This work has identified a soft sand need of 2.5mt and a sharp sand and gravel need of 5.75mt. It should however be noted that as sharp sand and gravel resources in Kent are rapidly depleting, Policy CSM2 recognises that the sharp sand and gravel requirements only need to be met whilst resources allow. Further details are set out in the Soft Sand and Sharp Sand and Gravels Topic Papers 2018.

At the conclusion of this stage of the assessment process, those sites that are demonstrably acceptable against the selection criteria will be identified as Preferred Options for allocation in the Mineral Sites Plan.

In essence, for a site to be allocated it has to be where viable mineral resources are known to exist; where landowners are supportive of mineral development taking place and where the Mineral Planning Authority considers that planning applications are likely to be acceptable in principle in planning terms having regard to planning policy and guidance.

The conclusion of the Detailed Technical Assessment work is set out in Section 6.

3 Initial Site Assessment

This section of the report reproduces the conclusions of the earlier site assessment work. This was previously set out in Kent Minerals Sites Plan – Mineral Site Selection – Initial Assessment November 2017. A summary of these finding is also set out in the Kent Minerals and Waste Local Plan 2013-30 Minerals Sites Plan Options Consultation Document, November 2017.

RAG Scoring Mineral Sites

Abbreviations:

- AONB Area of Outstanding Natural Beauty
- AQMA Air Quality Management Area
- BAP Biodiversity Action Plan
- GSPZ Groundwater Source Protection Zone
- GVZ Groundwater Vulnerability Zone
- KMWLP Kent Minerals and Waste Local Plan
- LWS Local Wildlife Sites
- PRN Primary Route Network
- PROW Public Right of Way
- SSSI Site of Special Scientific Interest

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Chapel Farm, Lenham (Ref. M3)

Address: Chapel Farm, Ashford Road, Lenham, Kent, ME17 2DP

Soft sand extraction, 4,000,000 tonnes over a period of 26 years at a rate of 150,000 tpa. Site is 58.67ha. Restoration: it is proposed to restore the site to a lower level by infilling and return the site back to an agricultural after use.

Consideration	RAG Outcome	Reason
Landscape	Amber	Although the site does not fall within the Kent Downs AONB, it is considered to be within its setting
Designations/Visual		and so potentially could have a moderate adverse visual impact on views towards the site from
Impact		within the AONB that may require mitigation/appropriate screening. This matter would be subject to
_		further detailed technical assessment.
Nature Conservation	Amber	Lenham Quarry (SSSI) is within 1km of the site, although it is unlikely to be adversely affected by
and Geodiversity		the site.
		Ancient Woodland, notably Roughetts Shaw is situated onsite, although this woodland has a felling
		license.
		A number of BAP Priority Habitats and LWSs are located adjacent to the site; mitigation would need
		to be considered to prevent adverse impacts on these designations from the site.
Historic Environment	Amber	There are a number of listed buildings within 250m of the site, notably: Chapel Farm (Grade II),
		Royton Manor (Grade II*), Mount Castle Farm Cottage (Grade II), Chapel Mill (Grade II), Vine
		House (Grade II), The Forstal (Grade II). Chapel Farm and Royton Manor both lie within 100m of
		the site. Chilston Park (Grade II) Historic Garden lies adjacent to the site.
		A number of archaeological sites have been identified within the site.
		Mitigation is likely to be necessary to prevent adverse impacts on Kent's heritage assets and/or
		their setting.
Water Environment	Green	The site is in Flood Zone 1. Part of the site is within GSPZ 3. A large part of the site is situated on a
		Major Aquifer Intermediate.
		Sand and gravel workings are classed as water compatible development and would therefore have
		no unacceptable impact on water resources.
Air Quality	Green	The site is not within, or located near to an AQMA and poses low or no risk of adverse impacts to
		AQMAs or air quality.
Soil Quality	Amber-Green	The site contains Grade 3 quality soil – Good to Moderate. The soil may be impacted, although
		opportunities for restoration to agricultural after use have been proposed which may mitigate any
		impacts in the long term.

Public Rights of Way (PROW)	Amber-Red	There are a number of footpaths that are located within the site, or in close proximity, notably: KH397, KH398, KH408, KH409, KH409B and KH428. Given the proposed 26-year operations of the site, impacts on these footpaths would require mitigation which would include diversion.
Transport	Amber-Green	It is proposed to provide a new access route adjoining the site to the A20 (PRN). The route would initially follow an existing (unclassified) agricultural track before adjoining the planned access route (cutting through agricultural land). The site could have a minor adverse impact on transport and access in the absence of mitigation, which could be provided through planning obligations.
Services and Utilities	Amber-Green	Lenham sewage works are situated adjacent to the site and a sewer line cuts through the site. Power lines also cross the western section of the site. Any adverse impacts on these services/utilities would require mitigation.
Health and Amenity	Amber	There are a number of residential properties within 250m of the site. Given the close proximity of residential properties, mitigation is likely to be required to ensure the site does not cause an unacceptable impact on health and amenity (dust, noise, vibration, visual amenity etc.).
Cumulative Impact	Amber	The area immediately surrounding the site has been subject to extensive quarrying activity. The accumulation of activity at the site with that of the quarrying activity in the surrounding area may well have a cumulative impact on the environment and on the local community that would likely require mitigation.
Airport Safeguarding Zone	Green	The site is not within, or near to an Airport Safeguarding Zone.
Green Belt	Green	The site is not within the Green Belt.
Summary and Outcome of Scoring (including key issues and constraints)		The site could make a significant contribution to the KMWLP requirements in the supply of soft sand. Overall, this assessment suggests that there are no constraints which cannot be overcome by
		appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal.
		Key findings of this assessment which may need further attention at the detailed assessment stage are as follows:
		 The site is within the setting of the Kent Downs AONB and appropriate mitigation measures would be required. SSSI is located within 1km of the site, Ancient Woodland is situated on the site and a
		number of BAP Priority Habitats and LWS are located adjacent to the site; mitigation

measures would be required to prevent unacceptable adverse impacts on these designations.
There are a number of listed buildings within 250m of the site; mitigation would be required to protect these heritage assets and their setting.
A number of archaeological sites have been identified within the site and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets.
The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest.

- A number of public footpaths are located within the site or in close proximity. Impacts on these footpaths would require mitigation which would include diversion.
- Overhead electrical power lines and sewer lines located within or adjacent to the site would require appropriate consideration of rerouting and mitigation.
- There are a number of residential properties within 250m of the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity.
- The surrounding area has been subject to extensive quarrying activity for a number of years. The cumulative impacts on the environment and local community, along with the impact on the highway network would need to be appropriately considered.
- An appropriate transport and access arrangement to prevent unacceptable adverse impacts on local amenity would also need to be considered.

Double Quick Farm, Charing (Ref. M14)

Address: Double Quick Farm Sawmill, Lenham Forstal Road, Lenham Heath, Kent, ME17 2BZ

Soft sand extraction, 1,000,000 tonnes over a period of 10 years at a rate of 100,000 tpa. Site is 3ha. Restoration: back fill with clean inert/re topsoil.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber	The site is within 2km of the Kent Downs AONB (approximately 1.3km) with separation afforded by the rail line and A20 to the north. The site is also within an area of open countryside. As such, landscape assessment would be required to determine the extent of any impact and any mitigation necessary to prevent any adverse impact on the open countryside and setting of the AONB.
Nature Conservation and Geodiversity	Green	The site would have no impact on international, national or local designations.
Historic Environment	Amber-Green	Individual listed buildings are located within 500m of the site, one of which is within 250m. The site may have an impact on the nearby listed building within close proximity that could likely be addressed through mitigation.
Water Environment	Amber-Red	The site lies within GSPZ 3, GVZ Major Aquifer Intermediate and Principal Bedrock Aquifer. Given the presence of the GSPZ, GVZ and Aquifer across the whole of the site, development may have a major impact on vulnerable water bodies in the absence of mitigation.
Air Quality	Green	The site is not within or near to an AQMA.
Soil Quality	Amber	Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good to Moderate) quality soil which is likely to be impacted by the site activities. Opportunities for mitigation/restoration exist in returning the site to agricultural use.
Public Rights of Way (PROW)	Amber-Green	Footpaths AW11A and KH402 are both located within 90m of the site. The site would not require the footpaths to be diverted, although mitigation/screening may need to be considered.
Transport	Red	It is proposed for the site to adjoin Lenham Forstal Road (a narrow unclassified country lane) which after approximately 2km adjoins the A20. There are severe impacts associated with accessing the site in that the surrounding road network is considered unsuitable for HGVs.
Services and Utilities	Green	There are no services or utilities near to or within the site.
Health and Amenity	Amber-Red	The site is located within close proximity to the small village/hamlet of Lenham Heath. There are a number of dwellings within 90m and adjacent to the site. The site could have major adverse impact to health and amenity in the locality in terms of dust, noise, vibration, visual intrusion and traffic

		associated with operations at the site which would likely require mitigation.
Cumulative Impact	Amber-Red	The area surrounding the site has a longstanding history of quarrying activity which may well result
		in an unacceptable adverse impact on environment and/or community that would require mitigation.
Airport Safeguarding	Green	The site is not near to, or within an Airport Safeguarding Zone.
Zone		
Green Belt	Green	The site is not within the Green Belt.
Summary and Outcome of Scoring (including key issues and constraints)		 The site is within and area of open countryside and within 1.3km of the Kent Downs AONB; appropriate mitigation measures would be required. There are a number of listed buildings within 500m of the site; mitigation would be required to protect these heritage assets and their setting. Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. A number of public footpaths are located within the sit. Impacts on these footpaths would require mitigation. There are severe impacts associated with accessing the site in that the surrounding road network is considered unsuitable for HGVs. There are a number of residential properties within 100m of the site (including in close proximity to the small village/hamlet of Lenham Heath). Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity. The surrounding area has been subject to extensive quarrying activity for a number of years. The cumulative impacts on the environment and local community would need to be appropriately considered. It is considered that the transport impacts could not be overcome and so the site is not proposed as an option for allocation in the Minerals Sites Plan.

Joyce Green Quarry, Dartford (Ref. M11)

Address: Joyce Green Lane, Dartford, Kent, DA1 5PN

Sand and gravel extraction, 1,500,000 tonnes over a period of 10 years at a rate of 150,000 tpa. Site is 55ha. Restoration: water bodies with wetland edges to provide additional biodiversity and recreational use of parts of the site.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber	The site is not within the AONB. The site is not within an area of open countryside but does cover an area of marsh grazing land within what is otherwise a predominantly industrialised/urbanised area. Mineral extraction would temporarily compromise the open, natural landscape which would require mitigation.
Nature Conservation and Geodiversity	Amber	Inner Thames Marsh and Purfleet Chalk Farm (SSSI) both within 2km of the site. BAP habitat Costal Saltmarsh and Mudflats adjacent to the site with half the site covered by BAP Coastal and Floodplain Grazing Marsh habitat. The whole site is covered by LWS – Dartford Marshes. The mineral extraction activities would result in the loss of the BAP Coastal and Floodplain Grazing Marsh habitat with proposed restoration to wetland. The BAP Coastal Saltmarsh and Mudflats adjacent to the site could also be adversely affected by mineral extraction at the site. The LWS Dartford Marshes would also be impacted by extraction activities although this may be appropriately addressed through the proposed wetland restoration. The impacts from development of the site may be mitigated or compensated such that there is net benefit to biodiversity from the proposed restoration.
Historic Environment	Amber-Green	The site is within an area of archaeological potential and investigative works would need to be undertaken to ensure there are no adverse impacts to Kent's heritage assets from development of the site.
Water Environment	Amber	The site lies within Flood Zones 2 and 3, and an area benefiting from flood defence. The southern extent of the site along with the permitted area of the site falls within GSPZ total catchment (zone 3). The site is also within Major Aquifer High Groundwater Vulnerability Zone. Sand and gravel extraction is considered water compatible development in accordance with the Flood Zone Vulnerability Classification Table, although the extraction activities may have a moderate adverse impact on other vulnerable water bodies (the GSPZ and Aquifer) requiring mitigation.
Air Quality	Amber	The site is within the vicinity of Dartford AQMAs 1, 2, 3 & 4. Bexley AQMA borders the site to the west. Given the proximity of the site to nearby AQMAs, the site may have an adverse impact on air quality requiring mitigation.

Soil Quality	Amber	Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good to Moderate) quality soil. The soil is likely to be impacted by activities at the site, restoration opportunities exist although it is proposed to restore the site to wetland habitat.
Public Rights of Way (PROW)	Amber	Footpath DB1 and Darent Valley Path / London Loop run through the site and alongside the southern site boundary. Footpaths DB2 and DB4 run alongside the eastern site boundary. The site is likely to cause a moderate impact on the footpaths crossing the site and adjacent to the site which may require diversion and mitigation. Opportunities to restore/reinstate the footpaths upon completion of the mineral extraction and restoration exist.
Transport	Amber	The proposed access to the site would be via Joyce Green Lane (an unclassified rural lane) to the roundabout junction onto Bob Dunn Way (A206). The site has good transport links to the PRN/SRN. However, there may be issues with the site access in that Joyce Green Lane may not be suitable for usage by HGVs and significant work may need to be carried out to make the proposed access feasible.
Services and Utilities	Green	There are no services or utilities near to, or within the site.
Health and Amenity	Amber-Green	The area around site is mainly coastal flood plain used for grazing with a recreational shooting range in the east and commercial/industrial uses to the west. The quarry is unlikely to cause significant amenity impacts. To the south of the site are two dwellings that are likely to see an increase in traffic, vibration, noise and pollution and so mitigation is likely to be required.
Cumulative Impact	Amber-Green	The area has seen quarrying activity in the past, there is industrial activity to the north, east and west and further activity at the proposed site may have a negative impact on the environment/locality.
Airport Safeguarding Zone	Green	The site is not within an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. Associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy.

Summary and The site could make a significant contribution to the KMWLP requirements in the supply of sharp sand and gravel. **Outcome of Scoring** (including key issues and constraints) Overall, this assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal. Key findings of this assessment which may need further attention at the detailed assessment stage are as follows: The site covers an area of marsh grazing land and appropriate mitigation measures would be required. • The entirety of the site is covered by LWS, SSSI is located within 2km of the site and BAP Habitats are located adjacent to the site; mitigation measures would be required to prevent unacceptable adverse impacts on these designations. The site is located within an area of Archaeological Potential and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets. Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. • The site is in close proximity to several AQMA's. Mitigation would be required to prevent an unacceptable adverse impact on the local air quality. • The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. • The site is within the Green Belt, appropriate consideration would be required to consider the potential impact upon 'openness'. • A number of public footpaths are located within the site or in close proximity. Impacts on these footpaths would require mitigation which would include diversion. • Nearby road networks may be incapable of accommodating HGVs; mitigation would be required to ensure that the impact upon the local road infrastructure is reasonable. • There are a couple of residential properties in close proximity to the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity. • The surrounding area has been subject to extensive quarrying activity for a number of years. The cumulative impacts on the environment and local community would need to be appropriately considered.

Central Road, Dartford (Ref. M7)

Address: Central Road, Dartford, Kent, DA1 5AH

Sand & gravel extraction, 900,000 tonnes over a period of 10 years at a rate of 90,000 tpa. Site is 23.2ha.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber-Green	The site does not fall within the AONB. However, the site is within an area of open land that would be readily visible from the surrounding area, particularly the residential properties to the east and the A206 to the north – this may have a minor adverse impact requiring mitigation.
Nature Conservation and Geodiversity	Amber	The site is listed within the Priority Habitat Inventory for Coastal and Flood Plain Grazing Marsh with the site situated on LWS Dartford Marshes. The site is likely to have a significant effect on the local designation; potential mitigation measures have not been included in the proposal.
Historic Environment	Amber-Green	There are no listed buildings within close proximity to the site. However, the site is in an area of archaeological potential which would need to be addressed and potentially mitigated.
Water Environment	Amber-Green	The site falls within Flood Zone 2 and 3, GSPZ 2 (Outer Zone), an area of a Major Aquifer High Groundwater Vulnerability Zone and within an area of Secondary A and Secondary (undifferentiated) aquifers. The site also falls within an Area Benefitting from Flood Defence. Although the site is in an area of high flood risk, the proposed sand and gravel extraction is considered water compatible development in accordance with the Flood Risk Vulnerability Classification Table. The aquifer present may require consideration, and potentially mitigation, to prevent adverse impacts.
Air Quality	Amber	The site is near to 3 AQMAS, within 90m of the Dartford Town Centre AQMA. It is not specified how many vehicle movements would arise from operations at the site. The site could have an impact on air quality should traffic from the site pass through an AQMA that would require
Soil Quality	Amber	The soil quality is stated as in part Grade 2 (Very Good) and Grade 3 (Good to Moderate) on Natural England's Agricultural Land Classification Map. Proposed restoration/after use is not stated and it is therefore possible that the Grade 2/3 quality soil may be lost without appropriate mitigation.
Public Rights of Way (PROW)	Amber-Green	The site is bordered by public footpath DB1 and bridleway DB4 to the west and to the east, both of which run in a north-south direction. Although the site is unlikely to require the two PROWs highlighted to be diverted, mitigation/screening may be required.
Transport	Amber-Green	Although access arrangements for the site aren't specified, the site adjoins Central Road (SRN)

		which is in close proximity to the A206 (PRN). Given that the site is located in a heavily industrialised area, mitigation may be required to prevent impacts resulting from an increase in
O and a second LICEC as	A I	vehicular movements in the area/associated with the site.
Services and Utilities	Amber	Powerlines are located within the site. These powerlines would require consideration and mitigation
Lia alda anad Anagasita	A I	if extraction were to take place on site.
Health and Amenity	Amber	Residential properties are situated to the east and west of the site beyond Central Road and the River Darent with properties having views that look out on to what is currently undisturbed marshland. Mineral activities at the site would potentially result in a number of adverse impacts on health and amenity in the locality, notably dust, noise, vibration and visual intrusion that would require adequate mitigation.
Cumulative Impact	Amber	The site is located in an industrial area with substantial residential development taking place in the nearby vicinity. The nearby AQMA also suggests significant traffic movements nearby. These factors suggest that mitigation may be necessary to prevent adverse impacts on the local environment/community.
Airport Safeguarding Zone	Green	London City Airport is located approximately 11.4km from the site. While this is within the 13km Aerodrome Safeguarding Area radius it is not considered likely that operations at the site would result in an increased risk of bird-strike to aircraft.
Green Belt	Green	The site is not within the Green Belt.
Summary and Outcome of Scoring (including key issues and constraints)		The site could make a significant contribution to the KMWLP requirements in the supply of sharp sand and gravel. Overall, this assessment suggests that there are no constraints which cannot be overcome by
and constraints)		appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal.
		Key findings of this assessment which may need further attention at the detailed assessment stage are as follows:
		 The site is situated within the LWS Dartford Marshes and is likely to have a significant impact on the designation. Mitigation measures would be required to prevent unacceptable adverse impacts on this designation. The site is located within an area of Archaeological Potential and a full investigation would
		be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets.
		Mitigation would be required to prevent unacceptable adverse impacts on the aquifers

Iocated within the site.
The site is in close proximity to three AQMA's. Mitigation would be required to prevent an unacceptable adverse impact on the local air quality.
The site contains Grade 2 (Very Good) and Grade 3 (Good to Moderate) quality soil. Appropriate consideration would be required to reduce the impact on this interest.
The site borders a public footpath and bridleway. Impacts on these would require mitigation which could

- The site borders a public footpath and bridleway. Impacts on these would require mitigation which could include diversion.
- An appropriate transport and access arrangement to prevent adverse impacts on local amenity.
- Overhead electrical power lines located within the site would require appropriate consideration of rerouting and mitigation.
- There are a number of residential properties to the east and west of the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity.
- Substantial residential development is taking place in the nearby vicinity. Significant traffic movements need to be considered and appropriately mitigated, including the impact on the AQMA

Moat Farm, Five Oak Green, Capel (Ref. M10)

Address: Moat Farm, Five Oak Green, Tonbridge, Kent, TN12 6RR

Sand and gravel extraction, 1,500,000 tonnes over a period of 15 years at a rate of 100,000 tpa. Site is 40.3ha and currently used for agriculture. Restoration: wetland habitat restoration using limited quantities of inert material.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber	The High Weald AONB is located approximately 1.8km to the north of the site and may therefore have some degree of adverse impact on its setting that may require mitigation. The site is also located within an area of open countryside which may require appropriate mitigation e.g. screening. A landscape assessment is required.
Nature Conservation and Geodiversity	Amber-Green	The site is bordered to the north-west by Ancient Woodland with further Ancient Woodland within 500m of the site to the south-west. Mitigation may be necessary to prevent any adverse impact on the Ancient Woodland.
Historic Environment	Amber-Green	The site is adjoined on its southern boundary by Moat Farm Listed Building. A number of other Listed Buildings are located within 1km to the east of the site in the village of Whetsted. Mitigation may be required to prevent adverse impact and to preserve the setting of Moat Farm.
Water Environment	Amber	The site is within Flood Zones 2 and 3. The site predominantly falls within GSPZ 2 with parts of the site falling in GSPZ 1. The site is partly within a Secondary Superficial Aquifer and Secondary (undifferentiated) aquifer, in addition GVZ - Minor Aquifer High covers the whole site. The sand and gravel extraction activities are considered water-compatible development in the Flood Risk Vulnerability Classification Table. Mitigation may be required to prevent adverse impact on the aquifers located within the site.
Air Quality	Green	The site is not within, or near to an AQMA.
Soil Quality	Amber-Red	Natural England's Agricultural Land Classification states that the soil is of Grade 3 (Good to Moderate) quality. The proposed restoration is to wetland habitat and therefore the agricultural land would be lost. Opportunities for mitigation/restoration to agricultural land exist.
Public Rights of Way (PROW)	Amber	Footpaths WT159 and WT158 cross the western extent of the site, with footpath WT169 runs along the southern boundary of the site. The two footpaths located on site would likely require extensive, and potentially permanent diversion with the proposed site restoration being wetland habitat.
Transport	Green	Access to the site is proposed via a purpose-built private road from Stonecastle Farm Quarry

		joining onto the A228 (Whetsted Road, PRN). The site would therefore utilise the existing access serving Stonecastle Farm Quarry.
Services and Utilities	Green	There are no services or utilities near to, or within the site.
Health and Amenity	Amber	There are residential properties within 1km of the site to the south in the village of Five Oak Green and to the east in the village of Whetsted, although only Moat Farm itself is located within 250m of the site. Given the sites proposed access and transport route via the existing Stonecastle Farm Quarry, the increase in traffic movements could potentially have a moderate adverse health and amenity impact in terms of traffic, noise etc. on properties in Whetsted and those located on or near to the A228 which would require mitigation.
Cumulative Impact	Amber	There has been a significant amount of quarrying activity in the area, notably with Stonecastle Farm Quarry to the east. The accumulation of activity at the proposed site and existing nearby quarry site may have a moderate adverse impact on the environment and/or community that would require mitigation.
Airport Safeguarding Zone	Green	The site is not within an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. Associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy.

Summary and Outcome of Scoring (including key issues and constraints)	The site could make a significant contribution to the KMWLP requirements in the supply of sharp sand and gravel. Overall, this assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal. Key findings of this assessment which may need further attention at the detailed assessment stage are as follows: • The site is within 1.8km of the High Weald AONB and appropriate mitigation measures would be required. • Ancient Woodland borders the site; mitigation measures would be required to prevent unacceptable adverse impacts on this designation. • A listed building borders the site and a number of others are within 1km of the site; mitigation would be required to protect these heritage assets and their setting. • Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. • The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. • A number of public footpaths are located within the site or in close proximity. Impacts on these footpaths would require mitigation which would include diversion. • There are a number of residential properties within 1km of the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity. • The site is within the Green Belt, appropriate consideration would be required to consider the potential impact upon 'openness'. • The surrounding area has been subject to extensive quarrying activity for a number of years. The cumulative impacts on the environment and local community, along with the impact on the highway network would need to be appropriately considered. • An appropriate transport and access arrangement to prevent unacceptable adverse impacts on local amenity.
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Lydd Quarry and Allens Bank Extension, Lydd (Ref. M2)

Address: Jury's Gap Road, Lydd, Kent, TN29 9JW

Sand and gravel extraction, 3,100,000 tonnes over a period of 12.3 years at a rate of 250,000 tpa. Site is 38.07ha. Restoration: it is proposed to restore the site to open water bodies.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber	The site is not within the AONB. It is within the open countryside and is a proposed extension to the existing Lydd Quarry and Allens Bank. Upon completion of mineral extraction at the site it is proposed to restore the site to open bodies of water. This would change the intrinsic character of the countryside in this locality although there are existing extensive areas of mineral workings including restored to open water/wetland in this immediate area.
Nature Conservation and Geodiversity	Amber-Red	The site is within the Dungeness, Romney Marsh and Rye Bay SSSI, adjacent to the Dungeness, Romney Marsh and Rye Bay Ramsar, SPA and SAC within 1km. BAP Priority habitat Coastal Vegetated Shingle is within and adjacent to the site with a number of other BAP habitats (Coastal and Floodplain Grazing Marsh, Deciduous Woodland, Traditional Orchard) within 1km of the site. The proposed site is likely to have a significant to moderate impact on the designations as the site is located within national designations, adjacent to international designations and within and in close proximity to local designations. The SSSI designation doesn't preclude extraction and may be acceptable if the geomorphological formations are widespread. There is also the possibility of enhancement through the creation of open water bodies through restoration.
Historic Environment	Amber	There are a number of Listed Buildings within 250m of the site, notably Tourney Hall (Grade II) adjacent to the site. The site is also located within an area of Archaeological Potential. Mitigation may be required to preserve the Listed Buildings and their setting; archaeological investigative works may also be necessary on the site before any extraction activity.
Water Environment	Green	The site is within Flood Zone 3 and benefits from flood defence. The site is within the Secondary Aquifer & Groundwater Vulnerability Zone notation for the area and the Minor Aquifer High notation that covers the whole site. Mineral extraction activities at the site would not have an unacceptable adverse impact on water resources.
Air Quality	Green	There are no AQMAs on, or within close proximity to the site.
Soil Quality	Green	Natural England's Agricultural Land Classification Map states the site contains Grade 4 (Poor) quality soil. Mineral extraction at the site would not result in the loss of good/very good quality soil.

Public Rights of Way (PROW)	Amber	Footpath HL26 borders and crosses the site, HL27 crosses the northern part of the site; HL48 borders the south of the site. It is likely that the footpaths highlighted would require temporary diversion. The stated proposed restoration is to open water bodies, although opportunities to restore the footpaths do exist.
Transport	Amber	Access to the site is via the Jury's Gap Road part of the SRN which serves the existing Lydd Quarry site, the PRN (A259) is some distance away (approximately 5km) past Lydd towards New Romney. There may be moderate transport impacts in that the access to the PRN would likely be via the town of Lydd, the road infrastructure may not cope with the increase in HGV movements, mitigation would be necessary.
Services and Utilities	Amber	Overhead electrical line route cuts through 'area 22' in the western extent of the site, adjacent to the existing Lydd quarry and sewage works. Sewer line runs through 'area 22' and 'area 23' of the site. The services and utilities highlighted could require consideration to affect any necessary rerouting or other mitigation.
Health and Amenity	Amber-Red	The town of Lydd lies adjacent to the south of the proposed site extensions, sharing a boundary with two areas of the site. A number of other residential properties are within close proximity to various areas of the site. Given the extensive area the site covers, the site could cause major adverse impacts (dust, noise, vibration, visual intrusion, traffic) to the health and amenity of the locality in the absence of mitigation.
Cumulative Impact	Amber	There are several restored mineral sites within the area, as well as the operational ones on which the extension is proposed. The site relates to multiple areas of extraction. The accumulation of the quarry extension with the existing quarry site may have a moderate adverse impact on the community and/or environment for which mitigation may be necessary.
Airport Safeguarding Zone	Amber-Green	The site is within 2.3km of Lydd Airport. It is not anticipated that the activities at the site would result in an increased risk of bird strike to aircraft.
Green Belt	Green	The site is not within the Green Belt.
Summary and Outcome of Scoring (including key issues		The site could make a significant contribution to the KMWLP requirements in the supply of sharp sand and gravel.
and constraints)		Overall, the assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal.
		Key findings of the assessment which may need further attention at the detailed assessment stage are as follows:

•	The c	uarry extension areas are located within SSSI, adjacent to Ramsar/SPA and within
	1km	of SAC. BAP Priority Habitat is located within the site as well as the surrounding area. Mitigation
	meas	ures would be required to prevent unacceptable adverse impacts on these designations.

- Subject to a study of the geological and geomorphological interests of the site, restored quarry water habitat areas could contribute to the value of the designated areas.
- There are a number of listed buildings within 250m of the site; mitigation would be required to protect these heritage assets and their setting.
- The site is located within an area of Archaeological Potential and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets.
- A number of public footpaths are located within the site or in close proximity. Impacts on these footpaths would require mitigation which would include diversion.
- Given the sites' distance from the Primary Route Network PRN (approximately 5km)
 mitigation would be required to ensure that the local road infrastructure (in particular the town of Lydd) is
 not adversely impacted.
- Overhead electrical power lines and sewer lines located within or adjacent to the site would require appropriate consideration of rerouting and mitigation.
- The town of Lydd lies adjacent to the site boundary. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity.
- The surrounding area has been subject to extensive quarrying activity for a number of years. The cumulative impacts on the environment and local community, along with the impact on the highway network would need to be appropriately considered.

Postern Meadows, Tonbridge (Ref. M12)

Address: Postern Meadows, Postern Lane, Tonbridge, Kent, TN9 1SW

Sand and gravel extraction, 230,000 tonnes over a period of 3 years at a rate of 75,000 tpa. Site is 7.2ha. Restoration: to landscaped lake without any infilling and restoration to amenity, nature conservation and recreational use.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber-Green	The site is not within an area of open countryside, the site is bounded by industrial development to the south, west and north-west and the River Medway to the north and to the east. The site does not fall within the AONB although may be considered to fall within the High Weald AONBs setting, any potential minor impact could be addressed through mitigation.
Nature Conservation and Geodiversity	Amber-Green	There is an area of Ancient Woodland approximately 300m to the east of the site. BAP Habitat (traditional orchard) approximately 600m to the south east. An area of deciduous woodland approximately 500m to the west of the site. The site may have a minor adverse impact on the nearby local designations highlighted, although this could be addressed through mitigation and potentially enhanced in the future following restoration.
Historic Environment	Amber-Green	There are listed buildings within 500m of the site to the west and to the southeast, although it is unlikely that activities at the site would have an adverse impact on the listed buildings. The site is within an area of archaeological potential, prior investigative work may be required to ensure the preservation of any archaeological assets on or near to the site.
Water Environment	Amber	The site is within Environment Agency Flood Zones 2 and 3, GSPZ 3 (total catchment), Minor Aquifer High Groundwater Vulnerability Zone. The sand and gravel extraction at the site is considered water compatible development in the Flood Risk Vulnerability Classification Table. The site may have some impact on the GSPZ/Minor Aquifer that may require mitigation.
Air Quality	Green	The site is not within an AQMA. Tonbridge High Street AQMA is approximately 1km away although it is considered that the site would have an impact on the AQMA.
Soil Quality	Amber	Natural England's Agricultural Land Classification states that the soil is of Grade 3 (Good to Moderate) quality. The proposed restoration is to landscaped lakes and therefore the agricultural land would be lost. Opportunities for mitigation/restoration to agricultural land exist.
Public Rights of Way (PROW)	Amber	Footpath MU33 runs adjacent to the southern boundary of the site. Footpaths MU32 and MU34 are both within 90m of the site. Wealdway and Medway Valley Walk lies within 90m of the site. Footpath MU33 is currently well screened, however further mitigation/screening may well be

		necessary for the other footpaths listed to ensure there are no negative impacts.
Transport	Amber-Green	Access to the site would be created through the industrial site to then adjoin the A26 (Vale Road, PRN). Mitigation may need to be considered in creating the dedicated access and preventing increased traffic with regard to the industrial site.
Services and Utilities	Green	There are no services or utilities near to or within the site.
Health and Amenity	Amber	The site is located within a predominantly commercial/industrial area. Individual properties are located within 250m of the site which may be moderately impacted by the site in terms of health and amenity – noise, dust, vibration, and mitigation may be required to address these potential impacts.
Cumulative Impact	Amber-Green	Given that the site is within a commercial/industrial area and the proposed access would be located through the industrial site there may be some cumulative impact in terms of increased traffic movements associated with the site.
Airport Safeguarding Zone	Green	The site is not within or near to an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. Associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy.

Summary and Outcome of Scoring (including key issues and constraints)	The site could make a contribution to the KMWLP requirements in the supply of sharp sand and gravel. Overall, this assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal. Key findings of this assessment which may need further attention at the detailed assessment stage are as follows: • The site is within the setting of the High Weald AONB and is bounded by industrial development; appropriate mitigation measures would be required. • Ancient Woodland is located within 300m of the site, deciduous woodland within 500m and BAP Habitat within 600m; mitigation measures would be required to prevent unacceptable adverse impacts on these designations. • There are a number of listed buildings within 500m of the site; mitigation would be required to protect these heritage assets and their setting. • The site is located within an area of Archaeological Potential and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets. • Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. • The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. • The site is within the Green Belt, appropriate consideration would be required to consider the potential impact upon 'openness'. • A number of public footpaths are located in close proximity to the site. Impacts on these footpaths would require mitigation which would include diversion. • Increase in vehicular movements on nearby road networks would require mitigation to ensure that the local road infrastructure is not adversely impacted. • There are a number of properties within 250m of the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adver
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Stonecastle Farm, Hadlow/Whetsted (Ref. M13)

Address: Stonecastle Farm Quarry, Whetsted Road, Whetsted near Tonbridge, Kent

Sand and gravel extraction, 1,000,000 tonnes over a period of 7 years at a rate of 200,000 tpa. Actual yield may be less due to quality issues. Site is 27.8ha. Restoration: phased restoration to follow after extraction - lakes, complex of vegetated/bare islands, trees kept back from lake edge.

Consideration	RAG Outcome	Reason
Landscape	Amber	The site is not within the AONB (the High Weald AONB is approximately 3km to the south west).
Designations/Visual		The site is within an area of open countryside, the landscape of which would be considerably
Impact		altered by the mineral extraction activities and proposed lake restoration – although this could
		enhance the landscape of the area.
Nature Conservation	Amber	There is Ancient Woodland adjacent to the site. The site contains BAP habitat Deciduous
and Geodiversity		Woodland. Although the adjacent woodland is likely to be maintained, sufficient mitigation would be
•		necessary to ensure this. The BAP woodland is shown as lost on the restoration plans, but this
		could be offset or amended by restoration that includes replacement woodland.
Historic Environment	Amber-Green	There are individual Listed Buildings within 250m of the site. Although it is unlikely, the site may
		cause a minor adverse impact to the Listed Buildings that would require mitigation.
Water Environment	Amber	The site lies within Flood Zones 2 and 3. GSPZ zone 2 and partly 3 Secondary A Superficial
		Aquifer and GVZ - Minor Aquifer High. The nature of operations at the site (sand and gravel
		extraction) is considered water compatible development. However, the site could have a moderate
		adverse impact on GSPZ/vulnerable water bodies in the absence of mitigation.
Air Quality	Green	The site is not within, or in close proximity to AQMA.
Soil Quality	Amber	Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good
-		to Moderate) quality soil. The soil present although not of the highest quality, would be impacted by
		the mineral activity at the site. Although the proposed restoration is to lakes and vegetated/bare
		islands, opportunities for mitigation/restoration exist.
Public Rights of Way	Amber-Green	PROW MT 160 runs along the northern edge of the River Medway, just north of the site (approx.
(PROW)		75m). PROW WT 168 is on the western boundary of the site which runs south from Hartlake
		Road. The two PROWs highlighted may be affected in their setting and require mitigation e.g.
		screening.
Transport	Green	It is proposed that the site would use the established access for the existing quarry. This site

		access adjoins directly on to the A228 (SRN). The site would not give rise to adverse impacts on
		transport and access to the PRN/SRN.
Services and Utilities	Amber-Green	There are overhead power lines that cross a small area of the south-western portion of the site.
		The power lines highlighted may require consideration and mitigation.
Health and Amenity	Amber-Green	There are individual residential properties within 1km of the site although they are unlikely to be
		adversely impacted by the proposal. The main impact on the locality would be the continuation of
		HGV movements at the established access and along the A228. Though this is unlikely to result in
		unacceptable levels of impact.
Cumulative Impact	Amber-Green	The proposed site is an extension to the existing Stonecastle Quarry site and as such there may be
		an adverse impact on the environment/locality from the continuation of extraction operations at
		the site.
Airport Safeguarding	Green	The site is not within an Airport Safeguarding Zone.
Zone	0.00.1	The site is not that in any inport saleguaranty Lone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be
Green Ben	7 Milber Green	inappropriate development within the Green Belt. Associated activities such as processing and
		restoration may affect 'openness' and if proposed would need to demonstrate the existence of
		'very special circumstances' as set out in Green Belt policy.
		very special circumstances as set out in Green Belt policy.

The Postern, Capel (Ref. M9)

Address: The Postern, Postern Lane, Tonbridge, TN11 OQU

Sand and gravel extraction, reserve estimate of 600,000 tonnes to be confirmed, 5-year extraction is suggested. Site is 12ha. Restoration: proposed lakes following extraction.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber-Green	The site lies approximately 1km to the north of the High Weald AONB, although it could be considered to have a minor adverse impact on the AONBs setting which could be addressed through mitigation. In addition, the site lies within an area of open countryside which may also require mitigation to prevent adverse impacts. A landscape assessment is required.
Nature Conservation and Geodiversity	Amber-Green	BAP Traditional Orchards occupy a small part of the site although mitigation would be possible to preserve this habitat. An area of Ancient Woodland lies within 500m to the west of the site although is unlikely to be affected by activity at the site.
Historic Environment	Amber-Green	Three listed buildings are within 250m of the site, with two Archaeological Sites also within 250m of the site. Mitigation may be required to ensure there are no adverse impacts on the setting of the Listed Buildings and Archaeological Sites from activities at the site.
Water Environment	Amber	The site is within Flood Zones 2 and 3, GSPZ 3. The site is also located in area containing Secondary (undifferentiated) superficial aquifer and Minor Aquifer Intermediate. The sand and gravel extraction activities are considered water-compatible development in the Flood Risk Vulnerability Classification Table. Mitigation may be required to prevent adverse impact on the aquifers located within the site.
Air Quality	Green	The site is not within or near to an AQMA.
Soil Quality	Amber	Natural England's Agricultural Land Classification states that the soil is of Grade 3 (Good to Moderate) quality. The proposed restoration is to landscaped lakes and therefore the agricultural land would be lost. Opportunities for mitigation/restoration to agricultural land exist.
Public Rights of Way (PROW)	Green	The site would have no effect on PROWs/Kent's Long Distance Trails.
Transport	Amber	Access information to the site has not been provided with the site nomination and so details are unclear. Postern Lane lies within 500m to the south of the site and adjoins the A26 (PRN) within 1km to the West in Tonbridge, although this lane would unlikely be capable of accommodating HGVs given the fact it is narrow, and therefore would require widening/making suitable for HGVs.

		Should the site be accessed to the north, both a dedicated access and a route of transport connecting to the A26 would be required. The site presents issues in terms of access/egress to the site as well as accessing the PRN and mitigation would therefore be necessary as well as potential planning obligations.
Services and Utilities	Amber	High Pressure Gas Pipelines cross the site. The sites promoter has stated that these pipelines would need to be avoided during extraction/restoration rather than being rerouted and as such would require mitigation.
Health and Amenity	Amber-Green	There are a small number of residential dwellings within 250m of the site with the majority of nearby land use being industrial/agricultural. The issues associated with transport/access to the site would likely have an adverse impact on health and amenity in terms of traffic, noise, odour etc.
Cumulative Impact	Green	There are no concerns of cumulative impact resulting from development at the site.
Airport Safeguarding Zone	Green	The site is not within or near to an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. The submission indicates that the resource would be processed elsewhere, and this location has not yet been determined. Any processing and additional plant may affect 'openness' and would need to demonstrate 'very special circumstances' as set out in Green Belt policy.

Summary and Outcome of Scoring (including key issues and constraints)	The site could make a contribution to the KMWLP requirements in the supply of sharp sand and gravel. Overall, this assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal. Key findings of this assessment which may need further attention at the detailed assessment stage are as follows: • The site is within 1km of the High Weald AONB and appropriate mitigation measures would be required. • BAP Traditional Orchards occupy a small part of the site and Ancient Woodland is within 500m of the site; mitigation measures would be required to prevent unacceptable adverse impacts on these designations. • There are a number of listed buildings within 250m of the site; mitigation would be required to protect these heritage assets and their setting. • A number of archaeological sites have been identified within 250m of the site and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets. • Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. • The site is within the Green Belt, appropriate consideration would be required to consider the potential impact upon 'openness'. • The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. • Nearby road networks are unlikely to be capable of accommodating HGVs; mitigation would be required to ensure that the impact upon the local road infrastructure is reasonable. • High Pressure Gas Pipelines which cross the site would require appropriate consideration of rerouting and mitigation. • There are a number of residential properties within 250m of the site. Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity.
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West Malling Sandpit, Ryarsh (Ref. M8)

Address: Land at the Roughetts, Roughetts Road, Ryarsh, West Malling, Kent, ME19 5LA

Soft sand extraction, 3,100,000 tonnes over a period of 24 years at a rate of 130,000 tpa. Silica sand extraction, 500,000 tonnes over a period of 24 years at a rate of 20,000 tpa. Site is 12ha. Restoration: 5-year restoration to be returned to agricultural land (as existing).

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Amber	The Kent Downs AONB lies immediately to the north of the site (separated by the M20) and the site is within an area of open countryside. It is likely that the site would require mitigation/screening to prevent any adverse impacts on the setting of the AONB and the open countryside. A landscape assessment would be required.
Nature Conservation and Geodiversity	Amber-Green	There are a number of international, national and local designations within close proximity to the site, notably: Trottiscliffe Meadow (SSSI, within 1.8km of the site), Ancient and Semi-Natural Woodland is located within the southern part of the site and surrounding the site, BAP Deciduous Woodland is located within the southern/western part of the site and surrounding the site. The site is unlikely to have an adverse impact on the SSSI highlighted. The proposed extraction intends to leave the Ancient Woodland and BAP Woodland intact, although mitigation would be necessary to ensure this.
Historic Environment	Amber-Green	There are a number of listed buildings within 500m of the site, 3 of which are within 260m of the site. In addition, there are a number of Scheduled Monuments within 1km of the site (Addington Long Barrow, within 960m and the Chestnuts Long Barrow within 1km), and Conservation Areas within 1km (Addington within 600m, Ryarsh Village within 640m and Offham Church within 800m). Mitigation may need to be considered to preserve Kent's heritage assets, particularly the listed buildings within close proximity to the site.
Water Environment	Amber-Green	The site is not located within Flood Zones 2 or 3. The site is located within GSPZ 3, is within Major Aquifer Intermediate Groundwater Vulnerability Zone, and Principal Bedrock Aquifer. The presence of the aquifer would require consideration prior to extraction and potentially mitigation.
Air Quality	Green	The site is not within, or in close proximity to an AQMA.
Soil Quality	Amber-Green	Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good to Moderate) soil.
Public Rights of Way (PROW)	Amber	Footpaths MR152 and MR153 run through the site in an east-west direction. The two footpaths would require diversion/mitigation during the lifespan of the site, although there is potential to

		reinstate the footpaths during the restoration of the site as it is proposed to be returned to agricultural land (as existing).
Transport	Amber-Green	The proposed access to the site would be via Roughetts Road (Unclassified) which adjoins the site to the east. It is proposed that vehicles accessing the site would do so via the A20 (PRN) within 500m of the site to the south. There are individual properties along Roughetts Road which would need to be considered and potentially mitigated through planning obligations.
Services and Utilities	Amber-Green	Although no services or utilities are located on the site/area of extraction, a number of which have been identified as in close proximity to the site, including: Openreach/Telecom, Plancast/Telecom, SGN/Gas, South East Water/Water, Southern Water/Water and Sewage, UKPN/Electricity, Vodafone/Telecoms. Potential adverse impacts to these services and utilities may require
Health and Amenity	Amber	There are a number of properties within 500m of the site, with the village of Addington within 500m to the west. The nearest properties are approximately 200m from the site, some of which are located along Roughetts Road (the proposed transport/access route). Due to the close proximity of residential properties potential impacts to health and amenity in the locality in terms of noise, dust, traffic, vibration and visual intrusion would need to be assessed and mitigation measures proposed.
Cumulative Impact	Amber-Red	Wrotham Quarry is located approximately 800m from the site with a former quarry approximately 100m away. Given the history of quarrying activity in the area past and present and the site being located proximate to the AONB, cumulative impact would be expected in terms of additional traffic in the area and the adverse impact associated with quarrying activity more generally, and the effect this would have on the community and the environment.
Airport Safeguarding Zone	Green	The site is not within or near to an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. Associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy.

Summary and Outcome of Scoring (including key issues and constraints)	The site could make a significant contribution to the KMWLP requirements in the supply of soft sand. Overall, the assessment suggests that there are no constraints which cannot be overcome by appropriate mitigation. This site should therefore be subject to consultation as an option as well as further detailed technical assessment and Sustainability Appraisal. Key findings of this assessment which may need further attention at the detailed assessment stage are as follows: • The site is within the setting of the Kent Downs AONB and appropriate mitigation measure would be required. • SSSI is located within 1.8km of the site, Ancient Woodland and BAP Deciduous Woodland are located within the site and the surrounding area; mitigation measures would be required to prevent unacceptable adverse impacts on these designations. • There are a number of listed buildings within 500m of the site; mitigation would be required to protect these heritage assets and their setting. • A number of Scheduled Monuments and Conservation Areas are within 1km of the site and a full investigation would be required to prevent unacceptable adverse impacts and to preserve Kent's heritage assets. • Mitigation would be required to prevent unacceptable adverse impacts on the aquifers located within the site. • The site contains Grade 3 quality soil (Good to Moderate). Appropriate consideration would be required to reduce the impact on this interest. • The site is within the Green Belt, appropriate consideration would be required to consider the potential impact upon 'openness'. • Two public footpaths are located within the site. Impacts on these footpaths would require mitigation which would include diversion. • There are a number of residential properties within 500m of the site (including the village of Addington). Given the close proximity, mitigation would be required to ensure there are no unacceptable adverse impacts on health and amenity. • The surrounding area has been subject to extensive quarrying activity for a number of y
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Wrotham Quarry Extension, Addington/Trottiscliffe (Ref. M5)

Address: Wrotham Quarry, Addington, West Malling, Kent, ME19 5DL

Soft sand extraction, 790,000 tonnes over a period of 16 years at a rate of 50,000 tpa. Silica sand extraction, 1,570,000 over a period of 16 years at a rate of 100,000 tpa. Site is 17.5ha. Restoration: restoration would be back to agricultural land at original ground levels following infilling with inert waste materials.

Consideration	RAG Outcome	Reason
Landscape Designations/Visual Impact	Red	The site is located proximate to the M20 but in an area of open countryside within the Kent Downs AONB and would likely have a detrimental effect on the landscape setting. Para 116 expects that major development should not be allowed within AONBs unless there are exceptional circumstances.
Nature Conservation and Geodiversity	Amber-Green	Trottiscliffe Meadows (SSSI) lies within 250m (approximately 100m) to the west of the site boundary. Halling to Trottiscliffe Escarpment (SSSI) is located approximately 1.2km away. Ryarsh Wood (Ancient Woodland) lies immediately adjacent to the site to the north east. BAP Habitat – Woodland Priority Habitat Network lies within the site with BAP Habitat - Lowland Meadows lies approximately 100m from the site. The Trottiscliffe Meadows SSSI is designated for its floral importance which reduces the potential impact of the quarry. It is also already bordered by an existing quarry. The Ancient Woodland is unlikely to be impacted by the proposal, restoration measures also include extending Ryarsh Wood allowing for potential enhancement.
Historic Environment	Amber-Green	Woodgate Farmhouse and Woodgate Cottage Listed Buildings lie within 90m of the site. A number of Archaeological Sites lie within 90m of the proposal. Addington and Trottiscliffe Conservation Areas are both approximately 500m distance from the site. A recent extension to Wrotham Quarry has been permitted in closer proximity to the Listed Buildings highlighted than the proposal; however, consideration and potential mitigation may still need to be given to preserve the Listed Buildings. Although there are no Archaeological Sites within the proposed site, the quantity of sites in the surrounding area suggest a potential for archaeological finds within the site, prior investigative work could clarify this to prevent adverse impacts on Kent's Heritage Assets.
Water Environment	Amber-Green	The site falls within GSPZ 3 and GVZ – Major Aquifer Intermediate. The site is not at significant risk of flooding; however, consideration/mitigation may need to be given to the Major Aquifer present on site to prevent impacts to water sources.

Air Quality	Amber	Although the site itself does not lie within an AQMA, the nearest AQMAs are the M20 (1) approximately 5.7km away, TMBC 7 - Borough Green approximately 4.34km away, Larkfield AQMA approximately 4.73km away and the M20 approximately 4.86km away. Therefore, whilst the site is not within an AQMA the main access routes on the PRN and SRN contain several AQMAs with the exception of the A228 which may adversely impact on Air Quality within the AQMAs.
Soil Quality	Amber-Green	Natural England's Agricultural Land Classification Map states that the soil present on the site is of Grade 3 (Good to Moderate) quality. As such, agricultural land would be lost as a result of mineral extraction at the site. However, restoration measures include returning the site back to agricultural land which may improve the quality of soil present at the site.
Public Rights of Way (PROW)	Amber	The Weald Way (PROW) crosses the eastern part of the site in a northerly direction. Two further PROWs cross the site to the west. These PROWs would require diversion for the duration of mineral extraction at the site. There are opportunities for the diverted PROWs to be reinstated following restoration at the site.
Transport	Amber	Access to the site would be via the existing quarry and private access. Access to the site from the existing quarry would be via a tunnel beneath Addington Lane. Access would be from the A20 (PRN) to the west via Ford Lane and a private 1.2km access road. The A20 lies within 1km of the existing quarry access. Junction 2a of the M26 (SRN) lies within 5km. Potential issues exist in using Ford Lane as this route is not necessarily a suitable road to accommodate quarry traffic, especially when taking into account the cumulative impacts with the existing quarries in the area.
Services and Utilities	Green	There are no services or utilities near to, or within the site.
Health and Amenity	Amber	Land use in close proximity to the site is mainly agricultural or existing quarry works meaning the potential for sensitive receptors is low. However, residential areas in Addington and Trottiscliffe are approximately 500-600m from the site, residents may experience issues relating to noise, dust and pollution from HGVs travelling to and from the site.
Cumulative Impact	Amber	This area is currently being extensively quarried and restored meaning there is intensive quarrying activity for a significant period of time, as such a large number of HGVs would be using the access roads. The restoration of the southerly quarry site and the opening up of the proposed site would intensify mineral extraction and associated operations in the locality.
Airport Safeguarding Zone	Green	The site is not within, or near to an Airport Safeguarding Zone.
Green Belt	Amber-Green	The site is within the Green Belt. However, mineral extraction activity is not considered to be inappropriate development within the Green Belt. Associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy.

Summary and	It is not proposed that this site form an option for consultation as it is located within the Kent Downs
Outcome of Scoring	AONB. Other sites have been identified as options for meeting the need for supplying soft sand
(including key issues and constraints)	which are located outside of the AONB. Allocation of the site would therefore be contrary to the National Planning Policy Framework as it would be possible to maintain an adequate landbank for soft sand outside of the AONB through other allocated sites – as long as these are developed. There is no expectation within the KMWLP that a site should be allocated for meeting requirements for silica sand.

4 Nominated Sites Eliminated at Initial Site Assessment Stage

The following sites were nominated and eliminated at Initial Site Assessment Stage on the basis that the adopted Kent Minerals and Waste Local Plan, and modifications proposed by the partial review, do not identify the need for the allocation of such a site.

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
Paradise Farm	Lower Hartlip Road, Sittingbourne, Kent, ME9 7SR	Brickearth extraction, 885,900 tonnes over a period of 19 years at a rate of 46,600 tpa	Majority of nominated site has recently been granted planning permission for brickearth extraction and the remaining areas would not be viable. The promoted site has and was the subject of a planning application in 2016 (ref. SW/0277/2016 for 0.885mt of Brickearth to be extracted over 19 years). This was permitted (January 2017) with deletion of two working phases that were adjacent to Newington (phases 16 and 17) and a minor area to the westerly quadrant of the site. This reduced the permitted reserve to 0.75mt to be extracted over 18 years. The un-permitted areas are nominated for allocation in the Minerals Sites Plan. The total reserve in Kent of Brickearth are 0.75mt at Paradise Farm, 0.15 mt at Orchard Farm, an estimated 0.08mt at Hempstead House and Jeffries, Claxfield Road that has an estimated reserve of 0.095mt. Overall the Kent Brickearth reserve is some 1.075mt. Those reserves under the control of the promoter amount to 0.995mt of this and would provide for approximately 23-24 years, almost for the required period of 25 years. The adopted Plan requires sites to be identified for the supply of Brickearth to have reserves of at least 25 years to support the level of actual and proposed investment of existing plant and equipment. Furthermore, the Brickearth resources that are still being promoted represent areas that are considered too small to be sites in their own right and may be unacceptable for material planning considerations.

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
Norwood Quarry (Engineering Clay)	Land adjacent to Norwood Quarry, Lower Road, Minster on Sea, Sheppey, Kent, ME12 3AJ	Engineering clay extraction, 1,000,000m3 over a period of 22 years at a rate of 50,000m3.	This site is identified in the Minerals Sites Plan though this site is an allocation in the adopted KMWLP. Further supply of clay for engineering purposes has been promoted through the Call for Sites exercise, as an extension to this site. The site promoter wishes to extract 1 million cubic metres of London Clay (at a rate of 50,000 cubic metres per annum) in three phases (1-3). Phase 3 and part of Phase 2 is currently the identified in the KMWLP as the strategic allocation for engineering clay extraction to meet needs for the clay and to create void space for the disposal of residues from Energy from Waste (EfW) processes in Kent. Thus, this strategic allocation currently adopted underpins the waste strategy needs of the KMWLP. The promoted site extension has a Phase 1 and the majority of a Phase 2. These areas, together with the adopted strategic allocation, would release significantly more engineering clay material than current need suggests is required. The strategic allocation site is identified as an adequate clay reserve up to 2030 in the adopted KMWLP. The NPPF does not
Richborough Road	Ramsgate Road, Richborough, Sandwich, Kent, CT13	Limestone extraction, 47,000,000 tonnes over a period of 19 years at a rate of 2,500,000 tpa.	A site providing this type of mineral is not required for allocation.
Wrotham Quarry Extension (Silica Sand)	Wrotham Quarry, Addington, West Malling, Kent, ME19 5DL	Silica sand extraction, 1,570,000 over a period of 16 years at a rate of 100,000 tpa.	A site providing this type of mineral is not required for allocation. Silica sand is a mineral that has national importance due to its limited distribution and its specialist application in industrial processes such as glass manufacture and as a foundry sand amongst others. In Kent the deposit is found in the Folkestone Formation as parts of the geological unit with particular purity. The NPPF states: Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

¹ 1 cubic metres of stiff wet clay has a mass of 1.826 tonnes

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
			providing a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant and the maintenance and improvement of existing plant and equipment, as follows:
			- at least 10 years for individual silica sand sites;
			- at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required. The adopted KMWLP states that the MPA will seek to permit sites to meet the above requirements and that proposals will be considered on their merits having regard to the policies of the Development Plan as a whole, with consideration of the technical matters and the husbanding of the material of high-grade (pure) deposits for industrial end uses. The Plan does not require silica sand sites to be allocated in the Mineral Sites plan and none have
Collarmakers Quarry	Collarmakers Quarry, Sandwich Road, Ash, Canterbury, Kent,	Sand extraction, 500,000 tonnes over a period of 10 years at a rate of 50,000 tpa. Inert Waste. 100,000 tpa	been promoted. Geology includes part the complex Lambeth Group of sands, clays and gravels. The formation has been quarried in the past (Upnor Quarry in Medway where the outcropped is a fine to medium grained clean sand to sandy clay that can be well graded, rounded
	CT3 2AH	capacity. Site is 10ha.	flint gravel is also present). The promoted site reserve is only estimated (no bore hole data has been supplied) nor is there any supporting technical evidence to demonstrate that the resource in this location is capable of yielding a building sand aggregate.

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
Wey Street Quarry	Wey Street Farm, Wey Street, Hernhill, Faversham, Kent, ME13 9JB	Sand and gravel extraction, 2,000,000 tonnes over a period of 20 years at a rate of 100,000 tpa. Site is 20ha. Inert waste, 100,000 tpa capacity.	Geology includes part of the complex Lambeth Group of sands, clays and gravels. The formation has been quarried in the past (Upnor Quarry in Medway where the outcropped is a fine to medium grained clean sand to sandy clay that can be well graded, rounded flint gravel is also present). The promoted site reserve is only estimated (no bore hole data has been supplied) nor is there any supporting technical evidence to demonstrate that the resource in this location is capable of yielding a sand and gravel aggregate.
Hegdale Quarry	Hegdale quarry, Faversham Road, Baddlesmere near Faversham, Kent, ME13 0JX	Chalk extraction, 1,500,000m3 over a period of 15 years at a rate of 50,000m3. Asbestos disposal, 100,000 tpa capacity.	The nominated site is an extension to an existing quarry of the same name in the Kent Downs Area of Outstanding Natural Beauty (AONB), a planning application would only be successful if it could

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
			agricultural chalk in the county at this time for the anticipated plan period.
			Sites providing additional waste management capacity are not required for allocation.
Blaise Farm (Cranford)	Blaise Farm Quarry, West Malling, Kent, ME19 4PN	Organic, Composting and Anaerobic Digestion.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Chilmington Green	Mock Lane, Chilmington Green, Ashford, Kent, TN23 3DS	Energy from Waste, Gasification and Anaerobic Digestion. 500,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Dunbrik Works	Land at Dunbrik Works, Main Road, Sundridge, Kent, TN14 6EP	Waste Transfer Station and Household Waste Recycling Centre.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Kemsley	DS Smith Kemsley Mill, Kemsley, Sittingbourne, Kent, ME10 2TD	Energy from Waste. 350,000 tpa capacity	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Lympne Recovery	Enterprise Way, Link Enterprise Park, Lympne, Kent, CT21 4LP	Gasification/Anaerobic Digestion/Depolymerisation. 500,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
North Farm Lane	North Farm Lane, Tunbridge Wells, Kent, TN2 3EE	Energy from Waste, Gasification and Anaerobic Digestion. 500,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Pedham Place	KCC Highways Depot, Pedham Place, London	Household Waste Recycling Centre, Waste Transfer Station. 100,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
	Road, Swanley, Kent, BR8 8TJ		
Richborough HWRC	Kent County Council Household Waste Recycling Centre, Ramsgate Road, Richborough, Sandwich, Kent, CT13 9NW	Household Waste Recycling Centre, Waste Transfer Station. 100,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Sevington	Sevington Depot, Waterbrook Avenue, Ashford, Kent, TN24 0GB	Green Waste, Anaerobic Digestion/Energy from Waste, Bio Treatment. 80,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Shelford	Shelford Landfill Site, Shelford Farm Estate, Broad Oak Road, Canterbury, Kent, CT2 0PU	Waste Transfer Station, Commercial and Industrial Waste. 40,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Springhead	Station Road, Springhead, Dartford, Kent, DA13	Energy from Waste. 600,000 tpa capacity	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Stone Pits	London Road, Dartford, Kent, DA9 9LD	Landfill, Inert Waste. 186,000 m3pa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
The Forstal	Kent County Council, The Forstal, Beddow Way, Aylesford, Kent, ME20 7BT	Household Waste Recycling Centre, Waste Transfer Station. 30,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Tilmanstone	Tilmanstone Colliery Tip	Landfill, Inert Waste. 100,000 tpa capacity	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation

Name of Site	Address of Site	Purpose of site nomination	Reason for elimination at Stage 1
	Regeneration, Pike Road, Eythorne, Dover, Kent, CT15 4ND		documentation for more details.
Unit P Continental Approach	Continental Approach and Car Park, Margate, Kent, CT9 4JL	Energy from Waste, 150,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Westbere	Island Road, Canterbury, Kent, CT2 0EZ	Composting, Green Waste. 30,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Westenhanger WTS	Newingreen, Hythe, Kent, CT21 4HU	Waste Transfer Station. 500,000 tpa capacity.	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Norwood Quarry (Waste)	Land adjacent to Norwood Quarry, Lower Road, Minster on Sea, Isle of Sheppey, Kent, ME12 3AJ	Inert waste landfill, 1,000,000m3 capacity. Hazardous waste landfill, 100,000m3 capacity	Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.
Richborough Hall	Richborough Hall, Ramsgate Road, Richborough, Sandwich, Kent, CT13 9NW	Secondary and Recycled Aggregates. Permanent facility.	Sites already have benefit of full planning permission for waste treatment activities that give rise to recycled aggregates from the Construction, Demolition and Excavation Waste stream. In this regard the sites are fully operational and contributing to the current supply of recycled aggregates (844,946 tonnes in 2015 or 16.59% of overall supply of aggregates). The sites were promoted as sites
Richborough Park	Richborough Park, Ramsgate Road, Richborough, Sandwich, Kent, CT13 9NW	Secondary and Recycled Aggregates. Permanent facility.	that could expand their waste role as waste facilities beyond current activities. Sites providing additional waste management capacity are not required for allocation. See Partial Review of KMWLP consultation documentation for more details.

5 Detailed Technical Assessment of Mineral Site Options

Section 2 of this report sets out the process of the Detailed Technical Assessment (DTA) phase. At the conclusion of DTA stage of the assessment process, those sites that are acceptable against the selection criteria will be identified as Preferred Options for allocation in the Mineral Sites Plan.

In essence, for a site to be allocated it has to be where viable mineral resources are known to exist; where landowners are supportive of mineral development taking place and where the Mineral Planning Authority considers that planning applications are likely to be acceptable in principle in planning terms having regard to planning policy and guidance.

Policy CSM2 of the KMWLP sets out the following criteria for selecting and screening the suitability of sites for allocation in a Mineral Sites Plan:

- (i) The requirement for the mineral;
- (ii) Relevant development management policies;
- (iii) Relevant policies in district local plans and neighbourhood plans;
- (iv) Strategic environmental information, including landscape assessment and Habitat Regulation Assessment as appropriate;
- (v) Deliverability; and
- (vi) other National planning policy and guidance

The policy also states that sites to be identified in a Mineral Sites Plan will generally be where viable mineral resources are known to exist, where landowners are supportive of mineral development taking place and where the Mineral Planning Authority considers that planning applications are likely to be acceptable in principle in planning terms.

Those sites which were identified as potentially suitable for allocation subject to public consultation and detailed technical assessment from the Initial Screening and RAG assessment work have been subject to more rigorous detailed technical assessment. This stage considered a range of environmental impacts including landscape and visual impact, amenity, highways and transportation, biodiversity, historic environment, water resources and flood risk, impact upon Public rights of way land stability and need. As appropriate it also included assessment in respect of:

- Habitat Regulations
- o Green Belt
- o Requirements of National Planning Policy and Guidance
- The Kent Minerals and Waste Local Plan 2013-30
- Sustainability Appraisal for each site

The work has also included a review of the soft sand and sharp sand and gravel requirements to be provided for in the Mineral Site Plan. Policy CSM2 of the KMWLP requires the Site Plan to allocate sites for soft sand and for sharp sand and gravel based upon the most recent calculations of requirements set out in the Local Aggregate Assessment. The review work has identified a soft sand need of 2.5mt and a sharp sand and gravel need of 5.75mt. It should however be noted that as sharp sand and gravel resources in Kent are rapidly depleting, Policy CSM2 recognises that the sharp sand and gravel requirements only need to be met whilst

resources allow. Further details are set out in the Soft Sand and Sharp Sand and Gravels Topic Papers 2018.

In response to the Call for Sites, 19 mineral sites were promoted for consideration, nine of which were selected as 'Options,' i.e. sites that were considered potentially suitable for allocation in the Kent Minerals Sites Plan, subject to public consultation and detailed technical assessment work. The Site Options subjected to detailed technical assessment (DTA) for soft sand were:

Site Ref	Soft Sand Sites	Estimated reserve
M3	Chapel Farm, Lenham	3.2mt
M8	West Malling Sandpit, Ryarsh	3.1mt (and 0.5mt of silica sand)

During the DTA stage, the promoter amended the Chapel Farm site to remove the eastern parcel of the promoted site and minor revisions to the access route onto the A20. Further information was also provided by the promoter of Site M8 indicating where the mineral would be excavated.

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The Site Options for sharp sand and gravel were:

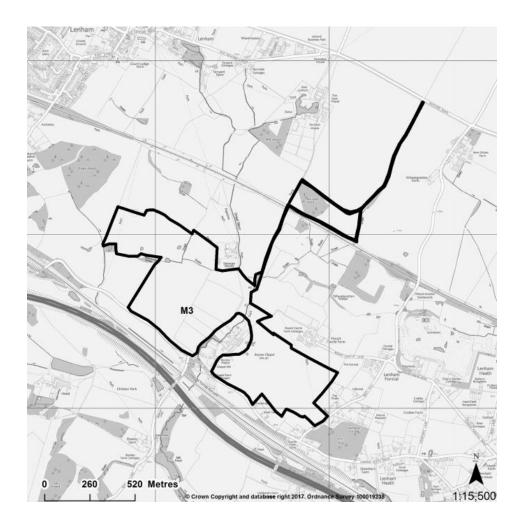
Site Ref	Sharp Sand and Gravel Sites	Estimated reserve
M2	Lydd Quarry/Allen's Bank Ext, Lydd	3.1mt
M7	Central Road, Dartford	0.9mt
M9	The Postern, Capel	0.6mt
M11	Joyce Green Quarry, Dartford	1.5mt
M13	Stonecastle Farm Quarry Ext, Hadlow/Whested	1.0mt
M12	Postern Meadows, Tonbridge	0.23 mt
M10	Moat Farm, Five Oak Green, Capel	1.5mt

During the DTA stage, The Postern, Capel site (M9) was withdrawn from further consideration by the site's promoter.

Full details of the nine sites that progressed to the DTA stage and the assessment conclusions are set out in the section below.

M3: Chapel Farm, Lenham - Soft Sand

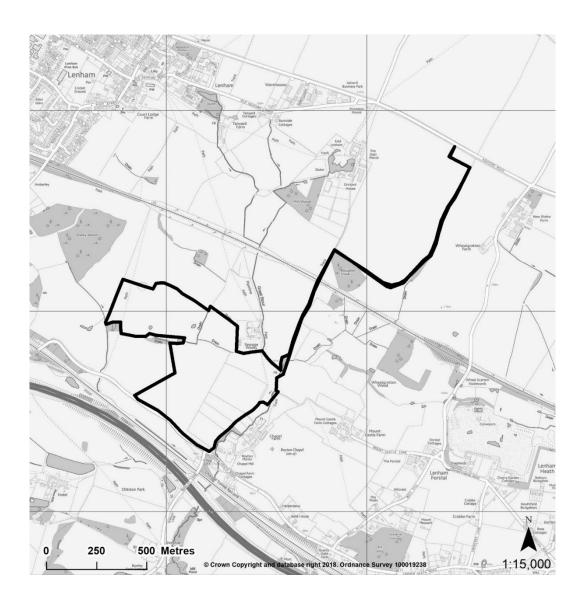
Initial Site Location Plan as Originally Promoted



Site Location Plan as revised September 2018 - (Chapel Farm West, Lenham)

Note that the eastern parcel has been withdrawn by the promoter

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1.0 Matters addressed by Detailed Technical Assessment

Initial Assessment

As set out in section 3 of this report, the initial assessment of the site¹ identified a number of matters which would require particular consideration, these were:

- Impact on landscape and particularly the Kent Downs Area of Outstanding Natural Beauty (AONB)
- Impact on biodiversity
- Feasibility of new access and impact of this on the highway network
- Impact on heritage, both archaeology and historic built environment
- Impact on Public Rights of Way (PROWs)
- Loss of grade 3 quality soil
- Impact on services and utilities such as the railway line and the wastewater treatment works (WWTW)
- Impact on local amenity
- Cumulative impact with other development in the area, including other quarrying operations and developments planned by Maidstone Borough Council.

Matters Raised during the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of Key Organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above. It should be noted that the views expressed were received prior to the withdrawal of the eastern part of the promoted site and therefore relate to the site as originally promoted.

Environment Agency (EA)

Any future application will need to be accompanied by an Environmental Impact Assessment with emphasis towards demonstrating the relationship between the upper reaches of the Great Stour (including its associated tributaries, both ephemeral and perennial) during the site's operation and subsequent restoration. Appropriate mitigation measures, substantiated through a detailed programme of monitoring, will be necessary to demonstrate that the workings will not have a detrimental impact on the following:

- Hydraulic continuity between those reaches of the Great Stour and associated tributaries, if proven to be in part dependent on groundwater baseflow originating from the adjoining aquifer (Folkestone Formation).
- The hydraulic integrity of the river is not compromised. In particular, the proposed plans will need to recognise the function of the foremost transient reaches of the Great Stour, which are dependent on both chalk escarpment seepage and surface runoff contributions, where

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¹ See Mineral Site Selection – Initial Assessment - Stages 1 and 2 of the Site Identification and Selection Methodology, November 2017 and reproduced in section2 and 3 of this document

underlain by Gault Clay to the immediate north of Chapel Farm. Any submission will need to account for this 'contribution', and the plans cannot allow the Great Stour to become hydraulically 'isolated' from its headwaters, irrespective of whether those watercourses are quantified as ephemeral.

 The underlining Sandgate Formation is not compromised, especially if the Formation is shown to be acting as an aquiclude at Chapel Farm, and within the immediate vicinity. Such a response is required to protect the Hythe Formation, which is classified as a major water resources aquifer unit.

Other EA comments:

- Lenham WWTW is immediately upstream of the proposed workings, which has a potential relevance given that the discharge will be dependent on flow.
- A licence would be required from the Environment Agency should there be a requirement to dewater the site.

Natural England – The site is in proximity to two SSSI's designated for their geological interest. Their distance from the site means it is unlikely to have an impact however advice should be sought.

The proposed allocation is in close proximity to the Kent Downs AONB and the proposal should be assessed carefully to determine whether the development would cause significant impact or harm. Views of the AONB unit should be taken into consideration.

If the proposal will result in the loss of the Ancient Woodland and partial loss of deciduous woodland habitat, it must be demonstrated that there are no alternative sources of the material from sites with less environmental impacts.

Highways England

Some sections of the Strategic Road Network (SRN) within Kent are currently congested, particularly during peak hours and at other times operate under considerable levels of stress. Accordingly, the construction and operational impacts of the identified Minerals sites on the SRN need to be considered, both individually and cumulatively in order to for us to be satisfied that the proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 and DCLG NPPF para 32).

No specific comment on Chapel Farm.

Historic England

No specific comment on Chapel Farm. Advice should be sought from county council specialist advisors.

Surrey County Council - Supports inclusion of two soft sand sites as this will give a surplus of soft sand over the plan period and recognises that soft sand supplies in Kent are relatively abundant whereas other parts of the southeast are constrained by protective designations such as AONBs and National Parks.

East Sussex County Council (ESCC) - Paragraph 2.12 of the Kent Minerals Sites Plan (Options document) recognises the role that Kent soft sand plays in the South East of England and states that the proposed two soft sand sites would provide a surplus which may help meet increasing demand in other areas and for exports. There is a shortage of soft sand within the South East, all of the soft

sand within East Sussex is within the South Downs National Park which is highly constrained.

In the absence of sources to meet the constructional needs of East Sussex within East Sussex, it is hoped imports of soft sand from Kent can continue. ESCC Strongly supports the two sites put forward for allocation.

West Sussex County Council (WSCC) - pleased to note that two suitable sites have been identified for allocation, which will meet the calculated shortfall of 1.9 million tonnes as set out in Kent's LAA. The sites identified would provide around 7.1mt, therefore a surplus of around 5 million tonnes of soft sand. A surplus allocation in Kent would provide some certainty that the shortfall in soft sand supplies in West Sussex could be met from beyond West Sussex where the resource is constrained by the South Downs National Park.

Due to the unique constraints in the South East, allocation of the two sites (Chapel Farm & West Malling) would be justified as it would reduce reliance as a whole in the South East of extraction from protected areas, such as the South Downs National Park. NPPF Paragraph 145 requires MPAs to make provision, taking account of the advice of the AWP. The South East AMR shows that there are supply issues in the South East, therefore it would be justified to consider allocating a surplus through the Kent Mineral Sites Plan.

South Downs National Park (SDNPA) – The key issue is the provision of soft sand as the main source of sand is within the SDNP and heavily constrained. SDNPA is keen to work with authorities in the wider area to ensure that soft sand is identified and able to be worked in the most sustainable locations.

In line with national policy and guidance, particularly NPPF paragraphs 114, 115 and 116 and the additional guidance in the PPG, the SDNPA supports:

- the statements included in paragraph 2.12 about the relative abundance of soft sand within Kent and the constraint on resources particularly within national parks; and
- the proposed allocation for two soft sand sites within the proposed options for the KCC Minerals Plan.

Maidstone Borough Council – Maidstone BC identifies Lenham as a "broad location" for some 1000 dwellings to be delivered from 2021 onwards. Lenham Parish Council is also preparing a Neighbourhood Plan which will include site specific allocations for development. Impact of traffic movements on the A20 should therefore take account of the planned growth for the area.

The quarrying activities or the proposed haul road could be extremely detrimental to the Ancient Woodland and impacts need to be assessed and avoided if possible including consideration of a buffer. A felling licence for coppicing of East Lenham Roughett was granted in 2012 which indicates that the woodland is currently being appropriately managed to optimise its biodiversity value and longevity.

Lenham Heath & Chilston Park Local Wildlife Site (LWS) is adjacent to the proposed site, as is Bull Heath Pit LWS. Proposals must be assessed for any adverse impacts on these wildlife sites, including through disturbance caused by nose and traffic. There is also a stretch of trees within the LWS which are subject to a Tree Preservation Order (TPO).

The nearby listed buildings include Royton Manor (Grade II*) and Chapel Mill (II) (both situated between the eastern and western segments of the site), Vine House (II) (at the junction of Lenham

Heath Rd and Bull Hill) and Mount Castle Farm Cottage (II) (north of the site). If the extraction is shallow, open—cast then this may not have necessarily permanent implications for the listed buildings or their setting. Once extraction has been completed, the land in question may be backfilled and recultivated and re-landscaped to a high standard, secured via a legal agreement. Any re-landscaping should precisely attain the same contours in the land that exist today; improved biodiversity may also eventually be secured.

Extraction must not extend into established property boundaries or curtilages and should be confined to the interior spaces of the open fields only. Mature plantings or historic landscape features should also be avoided and worked around. There is the prospect of an adverse impact on the remains of a chapel which are denoted in the eastern field. The chapel site should remain untouched, and an appropriate boundary for this will need to be established. The chapel is not just a stand-alone asset and is very much linked to the adjacent properties, and to the significance of the landscape in which it sits.

Disturbance to the adjacent listed buildings and their low-specification foundations due to quarrying at the site should be considered as well as impacts caused by heavy lorries on footings and poorly bonded masonry that often characterises vernacular buildings. Heavier machinery (30 tons) could be accommodated within the site and away from properties, and a management agreement could be drawn up to this end.

Both the eastern and western segments of the site are crossed by PROWs which would require diversion. The council's records also show the land to be of Grade 3 agricultural quality and this may require further site-specific assessment of its quality and the significance of any loss.

Lenham Parish Council

Concerns raised were those submitted in 2010 during an earlier consultation on mineral development in this location which suggested there would be adverse impacts on the following:

- Kent Downs AONB
- Listed buildings and registered parks and gardens
- Feature of archaeological interest
- Public Rights of Way
- Ancient Woodland
- Agricultural land
- A Site of Nature Conservation Interest

Southern Water – Lenham WWTW is adjacent to the north boundary of the site, the access road runs through the proposed site. Operational equipment at Lenham WWTW is in continual active use, therefore it is essential to maintain unhindered access to the WWTW via its access road at all times. Sewerage infrastructure also crosses the site which connects the southern areas of the catchment of the WWTW and requires protection. Diversion may be possible at the operator's expense, provided a feasible route is available. Further engagement should be sought with Southern Water as the development proposal progresses. Provided that appropriate policy provisions are made, this is not considered to be a fundamental constraint.

Public Health England— Risk of crystalline silica (quartz) exposure to members of the public is much lower than occupational exposure. Non-occupational exposure to quartz can occur through the use of certain cosmetics, paints, pet litter, and other household or craft items.

On mineral sites which are well managed with control measures in place to manage environmental concentrations of particulate matter off-site, concentrations remain below those associated with long or short-term impacts. However, additional detail would be needed (such as that which would be available at planning application stage) before further, site specific comments can be made.

Kent Downs AONB Unit – The site is within the setting of the Kent Downs AONB. Views to the south from the AONB were a principal reason for the designation and are a feature which merits protection – this means the impact of proposals on views from the AONB need careful consideration.

The part of the site west of Chapel Farm and the proposed haul route is particularly prominent from the AONB to the north, the North Downs Way national trail and other public rights of way and roads to the north of the A20. Due to the topography of the land and intervening vegetation the eastern part of the site is less prominent in views, although still partially visible.

A visual impact assessment should be undertaken prior to allocation to assess whether impacts can be satisfactorily mitigated.

Any application should carefully consider mitigating the impact of the haul route in addition to the area of minerals with careful consideration of method of working and phased restoration, to ensure that a large area is not open at any one time.

British Archaeological Trust - There appear to be extensive multi-period archaeological remains within the site and full investigations would be required at planning application stage and should include trial trenching which could lead to full excavation on some or all of the site. Consideration should also be given to the possibility that there might be archaeological deposits of sufficient importance to justify preservation in situ.

British Horse Society – The site is located on an Other Route with Public Access (ORPA) (which historic evidence suggests is an old road), it is adopted at each end but unadopted in the middle. This particular route has strategic importance with regard to vulnerable road users as it would provide one of the few safer links connecting the North Downs Way to the north with the lanes network to the south. This part of the Weald is in extremely short supply of PROWs so access to the Downs is of key importance. It is suggested that the route be designated as a restricted byway. It is understood that part of this route will form part of the quarry haul road, this is not ideal for leisure users, but local arrangements could be made on site as and when the haul route is in operation.

CPRE – Object to the allocation of the site for the following reasons:

- Impact on the Kent Downs AONB
- Adverse impact on listed buildings
- Disruption to PROW network
- Loss of grade 1 and 2 agricultural soil
- Adverse impact on archaeology
- Need for the material has not been justified
- Impact on the water environment and specifically the River Stour

Kent Wildlife Trust – Object to the site in the absence of information to demonstrate there will be no negative impact on the Ancient Woodland and the LWS "MA66 Lenham Heath and Chilston Park".

RSPB – The site will result in the direct loss of Local Wildlife Sites and therefore share the Kent Wildlife Trust's views on the site.

Forestry Commission - Site assessment has identified:

- Ancient Woodland is situated on the site
- Adjoining uses include nearby woodlands
- Ancient Woodland adjacent to the proposed route of the suggested haul road.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of Elected Representatives

Shellina Prendergast (County Member)

Considered that the site would result in adverse impacts affecting the following:

- Kent Downs AONB and wider landscape
- Local amenity due to noise and dust
- Highway in particular the A20
- Ecology in particular the River Stour
- Lenham Sewage Works
- Quality of agricultural land
- Heritage assets

Views of Local Residents

Concerns raised by local residents during the options consultation included:

- Impact on local amenity by way of noise, dust and vibrations
- Increased strain on local infrastructure such as the WWTW
- Impact on Ancient Woodland
- Impact on flora and fauna
- Significant archaeological remains within the site
- Proximity to listed buildings and Chilston Park (historic parks and gardens)
- Impact on equestrian activities
- Loss of the "Heaths Countryside Corridor" a local community initiated and managed project
- Cumulative impact with other developments, Maidstone BC local plan has allocated housing in Lenham and surrounding villages
- Proximity to Kent Downs AONB
- Impact on PROWs, North Downs Way, Stour Valley Walk and Pilgrims Way.
- Loss of grade 2/3 agricultural soil
- Highways infrastructure not appropriate should utilise rail sidings
- Impact on traffic congestion
- Impact on road safety for vehicles and pedestrians
- Unknown future demand of soft sand quantity and unknown quality of material
- Concerns over restoring land to lower level
- Impact on water environment including the Great Stour River

2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

The location of the site is remote and rural and away from any Air Quality Management Areas (AQMAs) and any significant area of residential development. There are a small number of residential properties which surround the deallocated parcel of land to the east of Chapel Farm, these are the properties on Lenham Heath Road, Bull Hill and Mount Castle Lane. The nearest settlement is Lenham Heath which is a hamlet east of the allocation. The closest residential property to the allocated site (the western parcel) is approximately 150m away and the distance from any excavation would likely be further in light of the anticipated stand-offs surrounding the Chapel Farm heritage feature.

The noise climate is likely to be heavily influenced by transportation noise, particularly from the M20 but also from Lenham Heath Road and the two railway lines. Therefore, ambient noise is likely to be very low which makes mitigation more achievable.

Sources of air pollution are likely to be background dusts from agriculture, some transboundary air pollution and NO2 particulates from the M20 and local road traffic. Public Health England have raised no specific objection to the site, advising that on mineral sites which are well managed with control measures in place to manage environmental concentrations of particulate matter off-site, concentrations remain below those associated with long or short-term impacts. However, additional detail would be needed (such as that which would be available at planning application stage) before further, site specific comments can be made.

Properties could potentially be impacted by noise, dust and vibrations resulting from operations at the site and HGV emissions but, with mitigation, it is considered that impacts will not reach unacceptable levels. The level of impacts to receptors east of the site will be significantly reduced due to the eastern parcel being removed from the allocation. In light of its distance from the site it is considered unlikely that Lenham Heath will experience unacceptable impacts. Mitigation against any adverse air quality impacts should be fully achievable, however the Maidstone AQMA (to the east of Maidstone Town) could be a constraint depending on the type and number of HGVs that access it.

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The County Council's assessment of the potential amenity impacts concludes that mitigation would be achievable. It is therefore concluded that any amenity impacts associated with the operations of the site can be satisfactorily mitigated in a manner similar to other quarrying operations in the vicinity of residential development.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

The site does not benefit from direct access to the highway network and requires a new access to be created. This proposed access is shown in the site location plan; it spans north from the proposed working area, across the railway line, and meets the A20 Ashford Road. In the initial site submission, the access track was proposed to line the edge of the land in the control of the landowner. This was deemed to be unacceptable as it did not allow sufficient room for visibility splays to be maintained. The proposed access has been moved westward so that the visibility splays can be accommodated by land in the control of the landowner. Utilisation of the railway is not considered practical by the site promoter but this would require further more detailed consideration at the planning application stage.

The Local Highway Authority raises no objection to the principle of the development. It advises that the A20 is part of the primary route network which is appropriate to accommodate HGV movements. It is not considered that the level of additional vehicle movements would likely be very low and that the A20 to accommodate the additional traffic without adverse impacts. A new access onto the A20 would require careful design with appropriate visibility splays. The new access directly onto the A20 will negate any need for access to the site via rural roads in the area.

In terms of cumulative impacts on the highway network with other planned development in the area (For example, the village of Lenham and nearby Harrietsham are proposed to be expanded within Maidstone Borough Council's Local Plan (adopted October 2017)), it is considered that the development would not result in the addition of significant vehicle numbers to the highway network. Further information regarding forecasts and impact on the road network would be required and assessed as part of a transport assessment in support of a planning application.

Although invited, no specific concerns have been raised by comments have been received from Highways England on this site.

In light of the above, it is considered that the site can be operated in a way which would not cause an unacceptable adverse impact on the highway network.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

The site is predominately arable, and the fields are surrounded by hedgerows and there is a small copse (with ponds) in the west of the site which is the feature of most ecological interest. An area of

Ancient Woodland (Roughetts Shaw) sits to the north of the area of working next to the proposed access track. The site is located within the upper reaches of the Great Stour. Lenham Quarry SSSI is approximately 800m from the site and Hart Hill SSSI is 2.5km away; both are designated for their geological interest. Lenham Heath & Chilston Park and Bull Heath Pit Local Wildlife Sites (LWS) are adjacent to the proposed site. Trees within the LWS are subject to a Tree Preservation Order (TPO).

KCC Biodiversity officers advised that should the site boundary include the Ancient Woodland, and should it be disrupted in anyway, this would afford the site a very high level of ecological constraint. Other bodies such as Natural England, Maidstone Borough Council and Kent Wildlife Trust objected or also raised concern about this matter. Given the concern, the Ancient Woodland has now been removed from the site boundary. However, the haul road will run adjacent, so policy provision must be made to ensure that no negative impacts occur as an indirect result of the development. This will include maintaining a buffer of at least 15 metres. The woodland copse to the west of the site would be similarly protected.

The Environment Agency objected to the site due to lack of information on how the operations will impact the ecology of the River Stour. However, these comments were based on the eastern parcel of the site still being included. Now that the eastern parcel has been removed, there will be no direct impact on the River.

The nature of the SSSIs and their distance from the site means that they are unlikely to be adversely impacted but this is a matter that will require further consideration if a planning application were to be made.

A number of BAP Priority Habitats and LWSs are located adjacent to the site but these do not present any major level of ecological concern that cannot be dealt with as part of the planning application process.

The proposed low-level restoration of the site will provide an opportunity to create habitat and enhance the biodiversity of the area.

Should an application come forward there will be a need for appropriate surveys of the ecology to be carried out, and specialist advice will be sought with regard to working arrangements and restoration proposals to ensure that features are not adversely impacted and, ultimately biodiversity enhancements are secured. In principle, it is considered there to be no material reason to not allocate the site due to adverse impacts on biodiversity.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

Nearby listed buildings include Royton Manor (Grade II*) and Chapel Mill (II) (both situated between the eastern and western segments of the site), Vine House (II) (at the junction of Lenham Heath Rd and Bull Hill) and Mount Castle Farm Cottage (II) (north of the site).

Cultural Heritage would need to be addressed through a multi-phased programme both desk-based and field work, with mitigation fully informed and appropriate to the significance of the heritage

assets affected. Taking account of the removal of eastern parcel from the allocation, it is considered that mitigation is possible to ensure local heritage assets, particularly the listed buildings within close proximity to the site, are protected from unacceptable impacts.

Archaeology

KCC Archaeological officers raised concern over the site as originally promoted as they consider that the archaeological interest, is so significant that it would be necessary to preserve the feature in situ and that impacts may not be mitigatable to an acceptable level. None of the land in this area would therefore be suitable for extraction. In light of this the site promoter has formally withdrawn this parcel so that only the land to the west of the Chapel Farm complex be included.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

With the omission of the eastern parcel of land, it is considered that the potential for archaeology within the remainder of the site is not sufficient to justify non-allocation.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The site has no impact on flood risk.

There is a watercourse to the northern part of the site which forms part of the Great Stour. The relationship with this will need to be fully explored as part of an EIA and monitored throughout the life of the site.

It is considered that any impact on the water environment can be satisfactorily addressed as part of the planning application process through further consultation with the EA and other consultees where necessary.

Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

The County Council's land stability report includes consideration of the site's proximity to sensitive receptors such as sewage lines, electricity pylons and the railway line. It is considered that impacts on these features can be mitigated with appropriate standoffs and diversion where necessary. A suggested standoff is 45 metres but this will be determined by quantitative slope stability assessment to be submitted with any planning application.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good to

Moderate) soil. It is considered that while mineral extraction would result in a loss of this soil such a loss would be temporary as the site would be restored to agricultural land.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

There were several PROWs running through the eastern parcel of the site, however as this has been withdrawn, the allocation would not have any impacts on access provided by these PROWs.

Other footpaths run adjacent to the west of the site, and to the north, with one crossing the proposed haul route. It is considered that diversions and screening can mitigate any impact on the PROW network as necessary.

Services and Utilities

The proposed site has been assessed against policy DM11 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes. This policy was prepared in line with the NPPF.

Lenham sewage works are situated adjacent to the site and a sewer line cuts through the site. Consultation with Southern Water has not revealed any insuperable obstacles to development of the site which arise as a result of this infrastructure. Power lines cross the western section of the site, but this area is no longer proposed for allocation.

Landscape and Visual Amenity

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no unacceptable adverse impacts on important landscapes, including the Kent Downs AONB, and sets out the circumstances where impacts upon them would be acceptable. Policy DM2 notes that proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the natural beauty of the AONB. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that minerals development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The site is approximately 1.5km to the south of the Kent Downs AONB and is considered be within its setting.

A landscape assessment has been carried out which concluded that whilst mineral working will have an impact on the long-range views from the AONB, these will likely not be significant.

The proposal was also assessed as likely to have an impact on the views from PROWs and residential properties surrounding the site. However, this was based on the site when the eastern parcel was included. As this has now been removed, residential properties are now further away from any mineral working and so the level of impact will be significantly reduced.

The Kent Downs AONB Unit stated that subject to the requirement for mitigation being included in

any policy provision for the site, they did not object.

Mitigation would be provided by existing screening, including hedges on the boundaries of the site, and this could be enhanced with additional planting including trees where appropriate. In particular screening should address the exposed properties along Lenham Heath Road.

Subject to considerable attention being given to inclusion of appropriate and acceptable mitigation, it is considered that the site could be developed without causing unacceptable impacts on the landscape.

Need for the mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of soft sand and silica sand. This policy was prepared in line with the NPPF.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 2.5mt for soft sand². The yield from this site is estimated to be 3.2mt.

The site is part of the Folkestone Formation (part of the Lower Greensand Group) and the economically important aggregate yielding geological unit, a loosely consolidated to unconsolidated marine (ancient beach) sand that is a unique part of the geological succession in Kent and the wider South East. The material is generally free of contaminants (in its purest form it is referred to as 'silica sand') and is of a particle shape and size consistency that makes it suitable as a mortar sand and its flow characteristics are such that it is often referred to a 'soft sand', it is also used as a constituent in coated stone production, or asphalts.

An alternative to the land-won soft sands, that will provide a steady and adequate supply as required by the National Planning Policy Framework, is unavailable at this time.

Neighbouring authorities support the allocation of sites suitable for the development of soft sand on the basis that this would help address a wider issue that the vast majority of soft sand in the unconstrained south east is being progressively exhausted, and much of what remains is constrained by designations such as AONB's or National Parks (such as the South Downs).

At this time, however there is no evidenced need to demonstrate a case to make significant over provision in Kent to meet a regional need.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised that mineral working has taken place in the surrounding area in the past. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. The assessment of potential impacts which could arise form development in this location has not revealed that unacceptable cumulative impacts would arise, however cumulative impacts will require further consideration if a proposal were to come forward.

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² See Soft Sand Topic Paper 2018

4.0 Conclusion - M3: Chapel Farm (West Site), Lenham

It is considered that the significant amendment to the site boundary (removal of the eastern parcel) addresses many of the issues associated with mineral working in this location including access, biodiversity and archaeology. The impact on amenity will also be reduced as residential properties are now further away from the proposed mineral working.

It is considered that other matters can be addressed and satisfactorily mitigated through the normal planning application process, seeking further views of consultees and technical advice where appropriate. It is noted that the site is currently allocated for mineral working by saved policy CA6 in the Kent Minerals Local Plan: Construction Aggregates 1993.

Therefore, it is considered that the site should be allocated with a requirement that any application demonstrates compliance with the development management considerations, with particular reference to:

Biodiversity

- At least a 15 metre buffer to be maintained around the Ancient Woodland at all times
- Lenham Quarry SSSI is approximately 800m from the site and Hart Hill SSSI is 2.5km away; both are designated for their geological interest. Lenham Heath & Chilston Park and Bull Heath Pit Local Wildlife Sites (LWS) are adjacent to the proposed site. Evidence to be submitted with any planning application to confirm that the LWS and SSSIs will not be adversely impacted
- Woodland copse to the north-west corner of the site must be maintained

Landscape

 Detailed information setting out proposed mitigation of visual impacts and demonstrating that the setting of the Kent Downs AONB will not be adversely impacted

Heritage

Nearby listed buildings include Royton Manor (Grade II*) and Chapel Mill (II), Vine House (II) and Mount Castle Farm Cottage (II). Consideration and mitigation of impacts on heritage assets including listed buildings is required.

Water Resources

- Any application will need to be accompanied by an EIA with particular emphasis on the site's relationship and impact on the Great Stour
- Appropriate mitigation measures and monitoring will need to be implemented as per the request of the Environment Agency, to demonstrate the following:
 - Hydraulic continuity between those reaches of the Great Stour and associated tributaries, if proven to be in part dependent on groundwater baseflow originating from the adjoining aquifer (Folkestone Formation).
 - The hydraulic integrity of the river is not compromised. In particular, the proposed plans will need to recognise the function of the foremost transient reaches of the Great Stour, which are dependent on both chalk escarpment seepage and surface runoff contributions, where underlain by Gault Clay to the immediate north of Chapel Farm. Any submission will need to account for this 'contribution', and the plans cannot allow the Great Stour to become hydraulically 'isolated' from its headwaters, irrespective of whether those watercourses are quantified as ephemeral.

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 The underlining Sandgate Formation is not compromised, especially if the Formation is shown to be acting as an aquiclude at Chapel Farm, and within the immediate vicinity. Such a response is required to protect the Hythe Formation, which is classified as a major water resources aguifer unit.

Transport and Access

- A detailed transport assessment to demonstrate compliance with KMWLP Policy DM13.
- The Transport Assessment should consider ability to access the site via rail, impacts on the A20 and the Maidstone AQMA and show how any potential adverse impacts on this AQMA will be mitigated.

Utilities

- Demonstration that sensitive receptors such as sewage lines, electricity pylons and the railway lines will not be affected by land instability caused by the development.
- The functioning of the Lenham WWTW and other sewerage infrastructure must not be adversely impacted

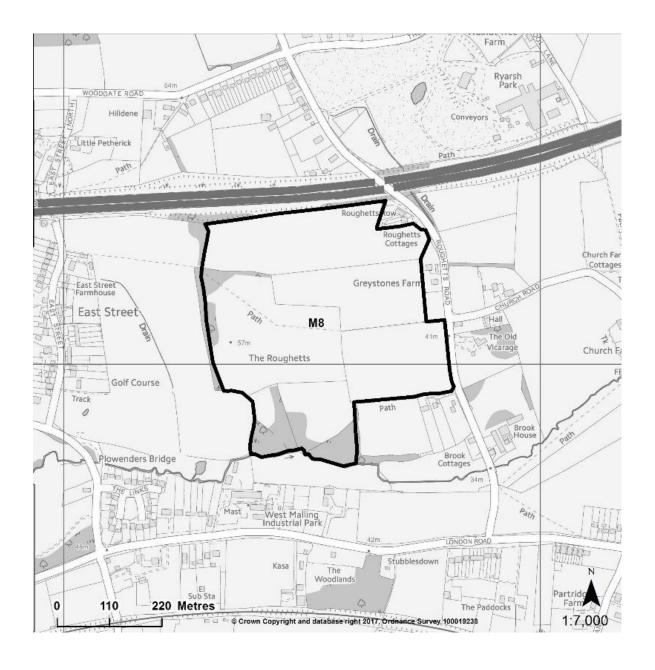
Health and Amenity

- Compliance with policy DM11 of the Kent Minerals and Waste Local Plan in respect of health and amenity.
- A lighting, noise, dust, and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance)

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M8: West Malling Sandpit, Ryarsh - Soft Sand (and 0.5mt silica sand)

Site Location Plan



M8: West Malling Sandpit, Ryarsh - Promoter's Indicative Proposal for Working the Site



1.0 Matters addressed by Detailed Technical Assessment

Matters Identified by the Initial Site Assessment

As set out in section 3 of this report, the initial assessment of the site identified a number of matters which would require further consideration, these were:

- Impact on landscape and the Kent Downs Area of Outstanding Natural Beauty (AONB)
- Impact on biodiversity
- Impact on historic environment
- Impact on water environment
- Loss of grade 3 quality soil

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- Impact on local amenity
- Impact on the Green Belt
- Impact on Public Rights of Way (PROWs)
- Impact on utilities/services
- Access to the site and associated impacts on the highway network
- Cumulative impacts with other developments and quarrying operations within the area

Matters Raised During the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency – No objection in principle.

The site is located in SPZ3, so waste activities should be avoided.

As the proposal includes the importation of inert waste to restore the site to existing levels, this will require an environmental permit.

No concerns regarding flood risk.

Any application would need to be accompanied by an Environmental Impact Assessment with emphasis towards demonstrating the relationship between the reach of the Leybourne Stream that bounds the southern flank of the proposed working.

Appropriate mitigation measures, substantiated through a detailed programme of monitoring, will be necessary to demonstrate that the workings will not have a detrimental impact on the following:

- Hydraulic continuity between susceptible reaches of the Leybourne Stream, if proven to be in part dependent on groundwater baseflow originating from the adjoining aquifer (Folkestone formation)
- The underlining Sandgate Formation is not compromised, especially if the Formation is shown to be acting as aquiclude at West Malling Sandpit, and within the immediate vicinity. Such a response is required to protect the Hythe Formation, which is classified as a major water resources aquifer unit.

Dependent on the proposed ways of working, Abstraction License 9/40/02/0020/SR potentially could be at risk of derogation, being located approximately 250m to the north west of the northern most curtilage of the quarry.

A licence should be sought from the Environment Agency should there be a requirement to dewater the site.

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Natural England – The site is within the setting of the Kent Downs AONB, therefore views of the AONB unit should be taken into consideration. A Landscape and Visual Impact Assessment (LVIA) will be required with any planning application.

The site is within the Impact Risk Zone (IRZ) for the Trottiscliffe Meadows SSSI, therefore extraction would need to avoid any hydrological impacts on the SSSI.

Highways England - Would have concern if the site affected the drainage, land or structure of the Strategic Route Network.

Historic England - No specific comment

Public Health England— Risk of crystalline silica (quartz) exposure to members of the public is much lower than occupational exposure. Non-occupational exposure to quartz can occur through the use of certain cosmetics, paints, pet litter, and other household or craft items.

On mineral sites which are well managed with control measures in place to manage environmental concentrations of particulate matter off-site, concentrations remain below those associated with long or short-term impacts. However, additional detail is required (such as that which would be available at planning application stage) before further, site specific comments can be made.

Surrey County Council - Supports inclusion of two soft sand sites as this will give a surplus of soft sand over the plan period and recognises that soft sand supplies in Kent are relatively abundant whereas other parts of the southeast are constrained by protective designations such as AONBs and National Parks.

East Sussex County Council (ESCC) - Paragraph 2.12 of the Kent Minerals Sites Plan (Options document) recognises the role that Kent soft sand plays in the South East of England and states that the proposed two soft sand sites would provide a surplus which may help meet increasing demand in other areas and for exports. There is a shortage of soft sand within the South East, all of the soft sand within East Sussex is within the South Downs National Park which is highly constrained.

In the absence of sources to meet the constructional needs of East Sussex within East Sussex, it is hoped imports of soft sand from Kent can continue. ESCC Strongly supports the two sites put forward for allocation.

West Sussex County Council (WSCC) - pleased to note that two suitable sites have been identified for allocation, which will meet the calculated shortfall of 1.9 million tonnes as set out in Kent's LAA. The sites identified would provide around 7.1mt, therefore a surplus of around 5 million tonnes of soft sand. A surplus allocation in Kent would provide some certainty that the shortfall in soft sand supplies in West Sussex could be met from beyond West Sussex where the resource is constrained by the South Downs National Park.

Due to the unique constraints in the South East, allocation of the two sites (Chapel Farm & West Malling) would be justified as it would reduce reliance as a whole in the South East of extraction from protected areas, such as the South Downs National Park. NPPF Paragraph 145 requires MPAs to make provision, taking account of the advice of the AWP. The South East AMR shows that there are supply issues in the South East, therefore it would be justified to consider allocating a surplus through the Kent Mineral Sites Plan.

South Downs National Park (SDNPA) – The key issue is the provision of soft sand as the main source of sand is within the SDNP and heavily constrained. SDNPA is keen to work with authorities in the wider area to ensure that soft sand is identified and able to be worked in the most sustainable locations.

In line with national policy and guidance, particularly NPPF paragraphs 114, 115 and 116 and the additional guidance in the PPG, the SDNPA supports:

- the statements included in paragraph 2.12 about the relative abundance of soft sand within Kent and the constraint on resources particularly within national parks; and
- the proposed allocation for two soft sand sites within the proposed options for the KCC Minerals Plan.

Tonbridge and Malling Brough Council – Noted that minerals can only be worked where they naturally occur and that minerals are an important material for construction.

The site does not conflict with the development strategy in the Borough Council's emerging Local Plan. The following matters should be given particular consideration when deciding whether or not to allocate the site:

- Impact on the amenity of nearby properties by way of noise, dust, vibration and lighting.
- Impact on the local highway network. Including the impacts upon the integrity of properties, pedestrian safety and air quality.
- Impacts on the Biodiversity Action Plan (BAP) habitat, Ancient Woodland and the SSSI.
- Water contamination.
- Impact on the Kent Downs AONB landscape designation

Ryarsh Parish Council – Strong objection on the following grounds:

Adverse impact on traffic:

- Road infrastructure (i.e. country roads) unsuitable to accommodate quarry traffic/HGVs, and the local road network is at full capacity already. This has become worse in recent years since the introduction of new housing developments such as Ryarsh Park and Leybourne
- Quarry traffic will use Ryarsh and Birling to get to or from the M20 or A20.
- The Roughetts Road and A20 junction is hazardous.
- Roughetts Road is only about 6 metres wide at one point and is too narrow for two lorries to pass safely. Vehicles will travel extremely close to pedestrians on the narrow pavement on Roughetts Road. Better lighting would be required.

Impact on air quality:

- Prevailing south west wind means dust from the sandpit will cover the whole area, including Ryarsh, Ryarsh Park and Leybourne Chase. There will be an unacceptable risk to health of residents due to silica dust e.g. risk of COPD and silicosis.
- Pollution will be caused by lorries travelling to and from the site.

Noise from digging, quarrying and from vehicle movements, especially in the summer and with prevailing winds will affect the locality. The site is so close too residential properties that mitigation to make the site acceptable is impossible. Parts of the village are already experiencing noise levels above WHO/EEA recommended levels.

The site would have an adverse impact on public rights of way which go through site as these will be lost - they are widely used and form a vital connection between Ryarsh and Addington.

There will be adverse cumulative impacts due to other quarries in the area.

The site is within the Green Belt and a quarry is inappropriate development in the Green Belt. TMBC Local Plan Green Belt Study September 2016 states that Ryarsh "retains a rural feel with open fields" and refers to "the smaller nature of the settlement"; "the village is small" and regarding openness has "a generally open landscape with open fields and a lack of urbanising features – a typical rural, Kentish landscape".

There will be a detrimental impact on the landscape character. The site is within the Kent Downs AONB and would have an adverse impact on its setting.

There will be a detrimental visual impact on the local and wider landscape area. Impacts on views cannot be mitigated by landscaping due to the proximity of neighbouring properties, the A20 and Roughetts Road.

There are nationally important archaeological sites in the area including The Coldrum Stones, Addington Long Barrow and St Michael & All Angels Church in Offham. Quarry will damage heritage assets. St Martin's Church, Ryarsh is the nearest to the site and will be most impacted. The proposal would affect a number of listed buildings in the vicinity of the site.

There will be adverse impact on the extremely important aquifer on the site.

There will be an adverse impact flora and fauna including ancient and BAP deciduous woodland.

There is no need for soft sand which can be sourced from existing sites and imported via wharves. Alternative materials could also be used. The calculation of need is incorrect. It must be possible to obtain purer silica sand from Surrey.

There is no need for new landfill and creating new voids in new quarries may create filling problems.

Objection to the initial screening assessment

Birling Parish Council – Objects to the potential allocation. The following grounds are raised:

- impact upon the surrounding communities and the locality traffic, noise, dust,
 landscape and visual impact, green belt, public rights of way and cumulative impact
- the initial assessment process was flawed
- the extent of need for soft sand has not been fully justified

Addington Parish Council – Objects to the proposal. The following grounds are raised:

- impact of further quarry on local infrastructure and residential amenity is unacceptable
- impact upon heritage, landscape, ancient woodland and local amenity
- air quality impacts
- unacceptable traffic impacts
- need not proven

Kings Hill Parish Council –Strongly objects to the proposal on the following grounds:

- traffic impact
- impact upon amenity dust, air quality, noise, PROWs and light pollution
- Impact on Green Belt
- Landscape impact

Supports the views of the many who have objected to the proposal

Leybourne Parish Council – Objects to the proposal. The following grounds are raised:

- Environmental Impact including air quality and health
- Inadequate transport infrastructure and impact upon local roads
- Existing traffic problems will be exacerbated

Offham Parish Council – Objection on the following grounds:

- Impacts from dust and health risks to the community
- Unacceptable impact on traffic and local roads
- Supports the objection from Offham Church and the need to protect this historic building

West Malling Parish Council – Concerns raised in respect of need, traffic, pollution and health risks and restoration of the site.

Kent Downs AONB Unit – The site is within the setting of the Kent Downs AONB. Views to the south from the AONB were a principal reason for the designation and are a feature which merits protection – this means the impact of proposals on views from the AONB need careful consideration. While views of the site from the AONB appear relatively limited, a visual impact assessment should be undertaken prior to allocation.

To avoid and minimise impacts on the AONB, appropriate and advanced landscaping would be needed as well as consideration of working methods to ensure a large area does not remain open.

Restoration to agricultural land, including reinstatement of hedgerows and hedgerow trees (to ensure restored levels are comparable with existing) would be supported.

PROW crossing the site which provide access to the AONB will need diversion.

Access to the site should be to/from the south to avoid use of rural lanes within the AONB to the north

CPRE – The allocation of the site is premature pending the outcome of the forthcoming Local Aggregates Assessment (LAA) and soft sand study.

Whilst the omission of extraction adjoining residential properties is welcomed, there is no indication that this part of the site will be safeguarded from extraction indefinitely. This assurance is necessary to avoid negative impacts on the residents.

The site is crossed by two footpaths which originate in a protected open space on the western boundary of the site; the West Malling Golf Club. Restoration should occur in tandem with the extraction to ensure that disruption to the footpaths is minimised. The site should also be restored to original land levels.

There are no details of any plant or buildings which would be required to serve the site. The site is within the Green Belt and whilst mineral extraction is not considered inappropriate development, associated activities such as processing and restoration may impact on the Green Belt's openness and would therefore need to demonstrate that very special circumstances exist to outweigh the harm to the Green Belt.

There is Ancient Woodland to the south of the site. Mitigation would be necessary to ensure that this and the BAP woodland remains intact. The extraction should also not adversely impact the water table which serves the Ancient Woodland.

Forestry Commission – will provide advice at the appropriate time to ensure that the most applicable measures are adopted to minimise and/or compensate for the impacts on Ancient Woodland.

Kent Wildlife Trust - Object to the site in the absence of information which demonstrates that the Ancient Woodland will not be adversely impacted.

The site will have an adverse impact on an area of rare Acid Grassland, known as The Roughetts. The retention, maintenance and restoration of this habitat is of great importance for the diversity of Kent's natural habitats.

The site falls within the Greensand Heaths and Commons Biodiversity Opportunity Area, which is of regional importance as a wildlife corridor.

RSPB - Share the views of Kent Wildlife Trust.

British Horse Society – Roughetts Road is used to access the limited rights of way network by many equestrians, the introduction of additional HGV's will increase the risk to riders using the road.

Request that diverted footpaths be upgraded to bridleways and an off-road bridleway to the west of Roughetts Road is provided to allow riders to keep off road as much as possible. Also request that the restoration makes use of the opportunity to provide new rights of way, road side margins and/or enhancement of the existing routes.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice from on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

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Views of Elected Representatives

KCC Member - Sarah Hohler

Ryarsh residents have been united in their opposition to the proposal to include this site in the Kent Waste and Minerals Local Plan and have been supported by neighbouring villages. The number of objections has been huge, as has attendance at local meetings.

As local member I have tried to make sure voices are heard, and listened to, and that information has been open and easy to access. I have not pre-judged the matter. The deeply heartfelt views of people are provided who are seriously concerned about the impact this site would have not only on their lives but on those of future generations. These views are backed up by careful and detailed research.

Tom Tugendhat, MP

The cumulative impact of the site together with previous and current mineral working would, in the view of residents, be severe.

As it is such a large site, the site would have a visual impact on the landscape and would affect views of local communities, including businesses and visitors. The site is within the setting of the Kent Downs AONB. The site is also located in the Green Belt and this should also be taken into account.

Vehicles should be prevented from travelling north from the site to roads in and around Ryarsh, Addington and Birling. In any event there is a risk that such routes could be used by accident including by speeding vehicles. There will be impacts on Roughetts Road due to an increasing number of vehicles. The impact on the A20 should also be considered in detail including the safety of the junction with Roughetts Road. Impacts on pedestrians should also be considered including the fact that well used PROW crosses the site.

Air quality will be impacted due to silica sand dust which is known to be severely harmful to health and this needs to be considered further. Other impacts on air quality arise due to excess Nitrogen Dioxide levels caused by HGVs. Effects on air quality due to silica dust will impact wildlife and ancient and BAP deciduous woodland and the views of Kent Wildlife Trust should be sought. Details should be sought concerning trees on the site and the existence of any Tree Preservation Orders. The site is within 1.8km of a SSSI and impacts on this should also be considered.

There are historic and listed buildings in the area, including the grade II listed Duke of Wellington pub, and impacts on these need to be considered.

If approved there should be stringent tests on restoration to ensure no impacts on, and enhancement of, biodiversity. The impact of loss of Grade 3 agricultural should also be considered.

The need for the mineral should be based on the latest guidelines. In accordance with government guidance areas with a smaller supply should meet their own needs and not rely on larger mineral planning authorities such as Kent to meet their needs.

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Views of local residents

Many of the local residents objecting to the proposed site have been as part of the Ryarsh Protection Group, an action group working alongside Ryarsh Parish Council to object to the allocation of the site. In addition to individual letters, it submitted a report entitled Why Ryarsh is an Inappropriate Location for the Proposed M8 Quarry Development, November 2018. This set out 32 grounds to support its view. A copy is appended at appendix 3 The views are supported by the local MP Tom Tugendhat.

Concerns raised by local residents during the options consultation included:

- Adverse impact on the local amenity by way of noise, dust and vibrations
- Strain on the local highway network which are inadequate for HGV traffic
- Destruction of the landscape and adverse impact upon the AONB
- Adverse impact on local water resources
- Adverse impact on flora and fauna including impact upon ancient woodland
- Adverse impact on quality of life
- General blight and pollution to the local environment
- Adverse impact on PROWs
- Visual impact
- Health risks from slow moving vehicles and risk of silicosis and other pulmonary diseases from the quarrying of silica sand that will cause respiratory silica to be breathable in the locality
- Adverse impacts from cumulative quarrying activity and the M20 motorway
- Adverse impact on Ancient Saxon village and historically significant buildings
- The promoter's noise and ecological survey work was flawed
- Potential operational; breaches and changes to planning schemes once permitted
- No benefits to the community
- Whether the need for the site (in terms of mineral supply) is justified

2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to

the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

Impact on amenity may arise as a result of dust, noise, illumination and vibrations resulting from operations at the site and from vehicle movements. The amenity impact could also have a visual dimension resulting from an activity which is industrial in nature being located within a semi-rural setting. Sensitive receptors include the communities (including visitors and businesses) proximate to the site itself and roads used to access the site may also be affected by impacts associated with the quarry traffic. There are a number of residential properties within 50m of the site.

With respect to air quality, the site is located between the M20, Roughetts Road and London Road which are the main sources of air pollution in the area. The Council's advisor on air quality, recognises that air quality is generally good, although notes that here is potential for health and amenity impacts at residential receptors in Roughetts Road to the east and London Road to the west. The golf course and the church (to the east and west, respectively) also represent sensitive receptors. It considers that appropriate mitigation of vehicle emissions is achievable, dependent on the nature of site activities.

Due to the presence of silica sand within the site, there is a risk that Respirable Crystalline Silica will arise from operations at the site. Advice from Public Health England (PHE) suggests that the risks associated with silica dust should be treated in the same way as the risks associated with any dust associated with quarrying or industrial activity and that this is primarily an occupational risk, as described in the Health and Safety Executive's "Control of exposure to silica dust: A guide for employees" advice note. The risk of non-occupational exposure to quartz (silica dust) arising from site operations is extremely low, and it is more likely to occur through the interaction with household items, such as paints and cosmetics.

The noise climate is likely to be influenced by road traffic noise from the M20 to the north and the A20 to the south. There are a number of individual dwellings within 50 metres of the site and mitigating the adverse impact for these dwellings is likely to require a combination of screening and an increased standoff. The residential development to the south and west of the site is in excess of 200m from the site and an acceptable level of noise environment is expected to be achievable.

At all quarries, steps are taken to minimise noise, for example by ensuring vehicles are fitted with silencers and acoustic barriers are constructed as required. Dust suppression measures are also employed to prevent dust dispersion. Due to the distance of the site from the village centre (including the school), noise and dust is not expected to have a noticeable impact on the village. Noise and dust issues would be considered in detail at the planning application stage, if detailed proposals were submitted.

The Council's assessment of the potential impacts on amenity concludes that whilst it may be challenging to mitigate all amenity impacts, particularly for those who live closest to the site, it would be unlikely that any amenity impact would be so severe that the site should not be developed. Mitigation of amenity impacts would be required, and this would likely include screening bunds and increased stand-off at some points, such as those closest to the properties along Roughetts Road. It is therefore considered that any amenity impacts associated with the operations of the site can be satisfactorily mitigated in a manner similar to other quarrying operations in the vicinity of residential development and it is concluded that potential amenity impacts are not sufficiently significant to

warrant non-allocation of the site.

Note that consideration of impacts on visual amenity are considered below.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

The promotor submitted a highways and transport assessment which considered whether Roughetts Road would have sufficient capacity as a road link. It was suggested that the Road has capacity for 1,020 two-way vehicles per hour, and it is currently operating at well below this (210 vehicles). Furthermore, London Road (which will connect the site to the SRN) is also operating at well below its threshold. It was therefore concluded that both roads have sufficient capacity to accommodate the forecasted increase in vehicle movements. This methodology factored in the anticipated background growth rates to 2030.

The concern that the junction of Roughetts Road and the London Road does not have capacity to accommodate regular HGV movements is also addressed which concludes that the junction is currently operating below the recognised threshold at both AM and PM hours and so the junction could accommodate guarry traffic.

Whilst recognising that Roughetts Road has previously been used by HGVs to access the former Ryarsh Brickworks site (now a housing development), the Local Highway Authority has concerns that the highways and transport assessment is deficient in a number of minor aspects. Ultimately however, it considers that it is possible to operate the site in a manner that should not result in unacceptable impacts on the road network. This is subject to any application fully addressing the following matters:

- The need for any localised road widening on Roughetts Road to accommodate turning movements to and from the site access.
- The need for regular road condition surveys to be carried out during the operation period with maintenance provided where required.

If an acceptable proposal were to come forward for development in this location an appropriate condition(s) would be imposed relating to HGV or other vehicle routing and this would include a prohibition of HGVs (or other vehicles if deemed necessary) from turning left out of the site entrance (i.e. to the north) or right into the site entrance (from the north). In this way all HGVs (or other vehicles if deemed necessary) would be required to travel to and from the A20 via that section of Roughetts Road to the south of the proposed site entrance. If HGVs travel the wrong way and enter or leave the site from / to the north, the operator could be served with a breach of condition notice. Such a requirement would avoid vehicles using unsuitable country roads to access the site from the north.

Landscape and Visual Amenity

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no unacceptable adverse impacts on important landscapes, including the Kent Downs AONB, and sets out the circumstances where impacts upon them would be acceptable. Policy DM2 notes that proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the natural beauty of the AONB. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that mineral development does not generate unacceptable adverse impacts from visual intrusion.

The site is directly to the south of the Kent Downs AONB, and although the M20 provides a barrier, it is within its setting. The proposed site is slightly elevated and located in open countryside.

Likely sources of landscape and visual effects associated with development include:

- Removal of vegetation cover, and soil stripping, as part of Site clearance activities;
- temporary diversion of footpaths that run through the Site;
- the presence of the Site compound, Site plant (including vehicles), and materials stockpiles;
- the presence of areas of excavation in the landscape;
- movement of HGVs accessing the Site; and
- the presence of infilling operations following the completion of excavation in each phase.

Three-metre-high screening bunds, together with tree planting, are proposed to mitigate the visual impact of the development for the lifetime of the activities.

A landscape assessment was submitted by the promotor, which concludes that the surrounding vegetation affords the site a fairly enclosed nature which limits views into the site. The assessment considers that the only noticeable visual impacts would occur in views from relatively close proximity to the site such as those from Roughetts Road, London Road, certain PROW and nearby residential properties and that mitigation in the form screening via bunding and planting would be inherent in the design. The nature of the development means it would progress gradually below ground level which would further reduce the visibility of extraction activities. The report concludes that the proposed development would have a highly localised impact on the landscape character, with the proposed mitigation considerably reducing any visual impact.

Kent Downs AONB Unit confirmed that it was broadly in agreement with the findings of the promoter's report that views of the proposed site from the AONB would be limited and concluded that, subject to a requirement for appropriate mitigation, it would not object.

A critique of the landscape assessment carried out on behalf of Kent County Council identified deficiencies in the promoter's assessment including:

- A lack of information provided about the phasing of extraction, restoration and mitigation measures.
- A lack of consideration of likely effects upon the Kent Downs AONB, on nearby properties and users of the public rights of way that run through the site.

Notwithstanding the above, the critique concluded that a number of measures could be employed to provide mitigation to reduce or eliminate adverse impacts. In particular screening should be provided

during the proposed extraction period particularly adjacent to the boundary viewed from Roughetts Road. Proposed restoration landscaping should, when available, take into account the loss of internal hedge material and enhance the existing woodland at the southern boundary to the site enhancing the identified ancient woodland and BAP deciduous woodland. It would also be preferable that planting and hedging is provided to compliment any proposed reinstated or public pathway realignment within the proposed development site.

The efficacy of such mitigation measures would need to be clearly demonstrated as part of any detailed planning submission.

Whilst it is anticipated that significant adverse visual effects could occur locally, in the wider context it is considered that effects would be limited by the level of enclosure provided by the pattern of vegetation cover.

Overall effects on the nearby Kent Downs AONB are also considered unlikely to materially affect the designation, but this needs to be confirmed by careful assessment.

In light of the above, the County Council considers that subject to certain matters being satisfactorily addressed at the planning application stage, the site is acceptable in principle on landscape grounds.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

Natural England advise that the site is within the Impact Risk Zone of the Trottiscliffe Meadows SSSI nearly 2 km away. It is considered that adequate mitigation could be put in place to ensure that development has no impact on the SSSI.

Disruption to the Ancient Woodland (directly or indirectly) to the south of the site should be avoided and an appropriate buffer zone between the Ancient Woodland and the workings would be required, the extent of which would be confirmed at the planning application stage.

Trees in the south western corner of the site are identified as part of a Group Tree Preservation Order (TPO – reference 05/00016/TPO). As above, disruption to the TPO should be avoided and an appropriate buffer zone would need to be provided between the protected trees and the excavation area. Impacts on affected trees would be considered in accordance with Policy DM2 of the KMWLP at any planning application stage.

Whilst Kent Wildlife Trust have concerns regarding an area of Acid Grassland on the site, surveying has revealed that this has not been managed and so is of poor quality and cannot be deemed Priority Habitat Quality. The proposal to manage an area of acid grassland would likely result in an improvement to the current situation such that the botanical interest of the grassland is enhanced.

There are number of protected species on site, however it is likely that appropriate mitigation can be implemented and the ecological interest of the site for these species can be maintained.

The Habitats Regulation Assessment does not conclude that mineral working in this location would have any impacts on designated European sites.

Considering the above information, the County Council considers that any impact on biodiversity could be addressed and satisfactorily mitigated at planning application stage.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

There are a number of listed buildings within 500m of the site, three of which are within 260m of the site. In addition, there are a number of Scheduled Monuments within 1km of the site (Addington Long Barrow, within 960m and the Chestnuts Long Barrow within 1km), and Conservation Areas within 1km (Addington within 600m, Ryarsh Village within 640m and Offham Church within 800m). The County Archaeologist advises that there is potential for Paleolithic remains within the site and that investigative works and possible mitigation would need to be included within any planning application. It is considered that mitigation is possible to ensure local heritage assets, particularly the listed buildings within close proximity to the site, are protected from unacceptable impacts.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

Need for the Mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of soft sand and silica sand. This policy was prepared in line with the NPPF.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 2.5mt for soft sand³.

The site is part of the Folkestone Formation (part of the Lower Greensand Group) and the economically important aggregate yielding geological unit, a loosely consolidated to unconsolidated marine (ancient beech) sand that is a unique part of the geological succession in Kent and the wider South East. The material is generally free of contaminants (in its purest form it is referred to as 'silica sand') and is of a particle shape and size consistency that makes it suitable as a mortar sand and its flow characteristics are such that it is often referred to a 'soft sand', it is also used as a constituent in coated stone production, or asphalts.

An alternative to the land-won soft sands, that will provide a steady and adequate supply as required by the National Planning Policy Framework, is unavailable at this time.

Neighbouring authorities support the allocation of sites suitable for the development of soft sand on the basis that this would help address a wider issue that the vast majority of soft sand in the unconstrained south east is being progressively exhausted, and much of what remains is constrained by designations such as AONB's or National Parks (such as the South Downs).

At this time, however there is no evidenced need to demonstrate a case to make significant over provision in Kent to meet a regional need.

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³ See Soft Sand Topic Paper 2018

Green Belt

The proposed site has been assessed against policy DM4 of the KMWLP which states that development within the Green Belt will be considered in light of its potential impacts and shall comply with national policy and the NPPF policy on Green Belt.

The site is within the Metropolitan Green Belt. Mineral extraction is not considered on its own to be inappropriate development, however structures such as bunds, plant and machinery which may impact of the openness of the Green Belt can be considered to be inappropriate development. Restoration of the site by backfilling within inert materials would comprise inappropriate development. In accordance with national and local policy an assessment of whether "very special circumstances" exist that would allow the development within the Green Belt is required. This assessment is set out in Appendix 2 and considers whether other considerations would outweigh the harm to the openness of the Green Belt or any other harm. This assessment concludes that while restoration of the mineral working by infilling to existing ground levels would constitute inappropriate development, it is considered that very special circumstances exist to override the presumption against this particular inappropriate development within the Green Belt. However, activities associated with the mineral extraction activity also constitute inappropriate development and, by virtue of the fact that the need for the development (supply of soft sand) could be met at an alternative suitable site outside of the Green Belt, it is considered that very special circumstances to override the presumption against inappropriate development in the Green Belt do not exist and allocation of this site in this location would therefore be inconsistent with local and national Green Belt policy.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The site is entirely located within Flood Zone 1 (less than 0.1% annual probability of flooding) and the Environment Agency has not indicated any concerns. The County Council's Flood Risk Assessment (FRA)⁴ recognises that there is an unnamed watercourse to the south of the site, however any potential flooding from this watercourse is likely to be directed to the lower-lying land to the south of the site. The FRA recommends that a 16-metre standoff be provided between any mineral working and this watercourse.

With regard to impacts on water quality, the Environment Agency considers that mitigation of potential impacts on groundwater and the Leybourne Stream caused by mineral working in this location is possible.

In light of the above it is concluded that the site's impact on the water environment does not render it unsuitable for allocation.

Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

⁴ Site M8: West Malling Sandpit Flood Risk Assessment, Waterco, July 2018

The Council's land stability report⁵ includes consideration of the site's proximity to the M20, highlighted by Highways England, and concludes that there are no issues which cannot be mitigated by standard quarry design practices.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site contains Grade 3 (Good to Moderate) soil. It is considered that while mineral extraction would result in a loss of this soil such a loss would be temporary as the site would be restored to agricultural land.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

It is considered that although PROWs (MR153 and MR152) cross the site, these would ultimately be reinstated following restoration and temporary impacts can be adequately mitigated by diversions that would allow continued connectivity between surrounding villages. The County Council's PROW Officer raises objection to the proposal subject to details of diversion being provided.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised that mineral working has taken place in the surrounding area in the past. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. The assessment of potential impacts which could arise form development in this location has not revealed that unacceptable cumulative impacts would arise, however cumulative impacts will require further consideration if a proposal were to come forward.

4.0 Conclusion - M8 West Malling Sandpit, Ryarsh

Whilst the site is generally considered acceptable in principle, there is strong policy opposition to any inappropriate development within the Green Belt, unless very special circumstances can be shown to exist. The County Council considers that, activities associated with the mineral extraction would not preserve the openness of the Green Belt and so the development is inappropriate, and at this time, very special circumstances do not exist, primarily as the quantity of soft sand needed over the Plan period can be met by another site that has been assessed as suitable for development which not

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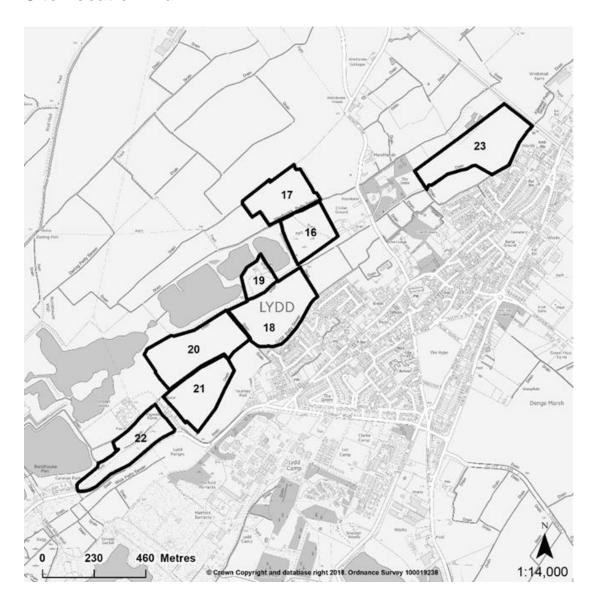
⁵ KCC (amey) Land Stability Assessment Technical Report August 2018

located with the Green Belt.

In light of this assessment it is concluded that the M8 West Malling, Ryarsh site should not be allocated. The site is not identified as a site in the Pre-Submission draft of the Mineral Sites Plan.

M2: Lydd Quarry/Allen's Bank Extension, Lydd - Sharp Sand and Gravel Sites

Site Location Plan



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1.0 Matters addressed by Detailed Technical Assessment

Initial Assessment

As set out in section 3, of this report the initial assessment of the site⁶ identified a number of matters requiring further consideration, these were:

- Impact on landscape
- Impact on biodiversity
- Impact on the historic environment
- Impact on Public Rights of Way (PROW)
- Impact on the highway network
- Impact on services and utilities
- Impact on local amenity
- Cumulative impact with historic quarrying operations in the area
- Impact on an Airport Safeguarding Zone (Lydd Airport)

Matters Raised During the Options Consultation

Views of Key Organisations

Environment Agency (EA) – Object in the absence of information to demonstrate that the site will not have an adverse impact on water ecology.

Site is located within Flood Zone 3 which has the highest probability of flooding and the area currently benefits from flood defences. No objection provided there is no loss of floodplain capacity or alteration of potential flood-flows during or after the mineral extraction.

The area is known to have a high groundwater level; however it is considered that the extraction of the mineral, and the subsequent creation of several flooded pits, will have no substantial consequences for groundwater flooding and are unlikely to result in an enhanced risk of flooding.

Providing that the functionality of the ditches and sewers local to the promoted site are not compromised there is likely to be little deterioration from the current level of risk, with respect to susceptibility to both groundwater and fluvial flooding events.

Natural England – Appendix 4 sets out the advice received from Natural England in full but this is summarised as follows:

Extraction of minerals will result in the direct loss of the geomorphological interest from this area of the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). Ditch and other wetland habitats from within the SSSI, Special Protection Area (SPA) and Ramsar Site are also likely to be directly impacted as a result of this proposed minerals allocation.

In addition to these direct impacts, based upon the best currently available information, there are

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⁶ See Mineral Site Selection – Initial Assessment - Stages 1 and 2 of the Site Identification and Selection Methodology, November 2017

potential indirect impacts to the wetland habitats surrounding the proposed allocation site from changes to the hydrology (including saline incursion), water quality and availability together with loss of supporting land for species associated with the SPA and Ramsar Site and the issue of disturbance are also likely to result from the proposal.

Full and independent consideration is required of whether there are alternative sites or sources of material which will avoid or result in lesser environmental effects.

The proposed allocation of Lydd Quarry would appear to be contrary to the National Planning Policy Framework (NPPF) since the Council's own documents confirm there are alternative sources to meet the demand. The allocation would also appear contrary to Policy CSM1 of the adopted Minerals and Waste Plan since Paragraph 177 of the NPPF confirms that 'the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.' Policy CSM2 of the adopted plan also confirms that alternative sources will be able to meet the demand by stating that if additional sites are not brought forward 'Demand will instead be met from other sources, principally a combination of recycled and secondary aggregates, landings of Marine Dredged Aggregate (MDA), blended materials and imports of crushed rock through wharves and railheads. The actual proportions will be decided by the market'.

Southern Water – Notes the following about the site:

- Sewerage infrastructure crosses several of the proposed sites.
- Lydd wastewater treatment works (WWTW) is adjacent to site 22.
- The access road for the WWTW runs between sites 21 and 22.

Does not consider any of the above to be a fundamental constraint, provided that appropriate provisions are made in the wording of any policy allocating these sites for minerals development.

The sewerage infrastructure connects the Lydd catchment to the WWTW and requires protection. Diversion may be possible at the operator's expense, provided a feasible route is available. Further engagement should be sought with Southern Water as the development proposal progresses.

Operational equipment at Lydd WWTW is in continual active use, therefore it is essential to maintain unhindered access to the WWTW via its access road at all times.

Folkestone and Hythe District Council - Object for a number of reasons:

- Several of the areas border housing in Lydd, the boundary follows residential back gardens, there may be an impact on public health and amenity.
- It is unclear how the Allens Bank parcel will be linked to the rest of the site. The railway should be utilised to prevent more HGV movements in the town of Lydd.
- Close proximity to the Dungeness Ramsar site, SPA and Special Area of Conservation (SAC), the proposed extension areas will require a Habitats Regulation Assessment. The site is within an SSSI.
- the site is within an area of archaeological potential and the Historic Environment Record show that there are a number of historic features within the site and a number of listed buildings within 250m.
- Potential for increased risk of bird strike due to open water bodies, could have impacts for the airport.

Lydd Town Council – Object for a number of reasons:

- Adverse impact (noise, dust and vibration effects) on quality of life and wellbeing to the residents of Lydd.
- Creation of further open water bodies and de-watering of aggregate extraction cells will
 exacerbate saline incursion to groundwaters due to increased evaporative losses and a
 hydraulic gradient being established with the nearby coastal waters.
- Impact on highways is unacceptable given that the local road network was not designed for the intensity of HGV use that is being proposed, the road infrastructure is being adversely affected at this time.
- No direct link between the economy of Lydd and the extraction of aggregates, no evidence of enhanced economic or employment benefit to Lydd.
- Alternatives to land-won materials around Lydd should be sourced.

East Sussex County Council- Sharp sand and gravel – The Council states that reserves for sharp sand and gravel are depleting at Lydd Quarry, this being one of the topics the Council are considering in the Review of the East Sussex Waste and Minerals Local Plan (WMLP). The Council point out that the operator of Lydd Quarry submitted a proposed extension to the quarry on the East Sussex side during the Call for Sites and Evidence consultation in 2017. The Council is currently considering this site and will determine whether it should be included in our Draft Revised Policies consultation later in 2018.

With regard to the Kent area Option site (Lydd Quarry and Allens Bank) the Council support the extra provision put forward in the Kent sites to serve the East Sussex market, subject to the following clarifications:

- prior to any decision being taken to allocate the proposed site, the Council would wish to understand whether overall production would exceed current levels. Were this to be the case and given that 50% of the quarry output currently serves the East Sussex market, consideration will need to be given to the impact of an increase in HGV movements, as well as any necessary and appropriate mitigation measures.
- The direction of working and phasing of the quarry extraction would need to be clarified. In the event that the quarry was to be extended both in Kent and East Sussex, would both sides of the quarry be worked at the same time? Or would production at the quarry concentrate in either Kent or East Sussex?
- If further reserves of this valuable material were to be allocated, its use should be limited to a constructional aggregate, and not for lower specification use such as beach replenishment.

Romney Marsh Internal Drainage Board (IDB) - The site is promoted as having a 'dry cell' extraction system in that water is pumped from an active pit, this presents two potential issues;

- a net loss of water for at least half of the year, and;
- salinity issues.

Currently water of varying salinity is discharged from the site into the Jurys Gut Sewer (Main River) from where it flows to the sea. Disposal of potentially saline water from the M2 sites as discharge into the nearest watercourse is not good practice.

Any loss of access to IDB interests and loss of habitat through development / erosion etc can be addressed and mitigation considered during the Board's Consenting procedure and is not a plan allocation matter. IDB Consent will be required for some aspects of the promoted work. Infilling and diversion of watercourses, whilst not an activity encouraged, is not insurmountable.

Offsetting the evaporation losses from the resultant lakes is a matter the EA should address once the losses have been quantified. The EA are the only organisation that could theoretically replenish losses from the District using the marsh feed.

British Horse Society – The area has a large equestrian population and increased heavy goods traffic and large plant working will cause an additional hazard for equestrians.

For this reason, we would ask that horse margins at the side of the roads be provided and/or the paths currently provided for walkers and cyclists be upgraded to also allow equestrians to use them. Connections to all PROWs must be maintained.

CPRE – Object to the allocation of this site for several reasons:

- The sites are designated as SSSI and as Areas of Archaeological Potential. They are adjacent to the Dungeness, Romney Marsh and Rye Bay Ramsar and are near to a Special Areas Conservation.
- Extraction from land east of PROW HL26 would adversely affect the setting of Listed Building Tourney Hall, as well as Lydd and All Saint's Church, Lydd and views of them from the PROW.
- It is also understood that the existing lakes and pools resulting from previous mineral extraction operations are becoming saline. This could have an adverse effect on nature conservation.
- Traffic impact on residential roads by HGVs coupled with HGV traffic moving shingle across the point. In accordance with previous practice it would be appropriate to compensate the local community for the inconvenience and disturbance.

Consideration should be given to dredging from Dungeness Point to provide material of the same quality before allocating the sites.

East Kent Badger Group – There are active badger setts on this land.

Kent Wildlife Trust - Object until it can be shown that there will be no negative impact upon Local Wildlife Site SH35 "Lydd Common and Pastures" with which the site overlaps. This is a designated site of County importance for nature conservation and therefore this needs to be taken into account.

In addition, there needs to be given consideration of the possible impact upon the National designation of Dungeness, Romney Marsh and Rye Bay SSSI; and European designated sites (Dungeness to Pett Level SPA, Dungeness SAC) in this area and the HRA process.

RSPB - Site would result in direct loss of local wildlife sites and therefore object to the proposal.

National Air Traffic Service (NATS) - No objection to the proposal

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources and drainage (flood risk), stability and highway and transportation interests. The views received has informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of Elected Representatives

Damian Collins MP (comments summarised)-The extraction of 3.1 million tonnes of sand and gravel at Option site M2 Lydd Quarry and Allens Bank extensions as being considered by Kent County Council would result in 12.4 years of operations with restoration to open water bodies would have boundaries that are very close to homes.

The residents of and around Lydd have experienced mineral extraction operations for many years and have become a fact of life locally. The process creates jobs and provides materials for flood defence along the Romney Marsh coastline and is vital in supporting the building of new homes. However, gravel extraction creates problems for the community, particularly from the noise of the quarrying and the transportation of the aggregate materials on local roads that are not suitably designed for that use. There is great disturbance for residents who live close to the sites. Therefore, the sensitive selection of the sites for large scale extraction is so important.

Alternative supply should be sought, particularly where coastal defence works are concerned. Thousands of tonnes of shingle are placed along the coast from Rye to Dungeness every year as part of sea defence works and much is washed out into the Channel. Also, much of this shingle gathers on the eastern side of Dungeness. There is no reason why this resource cannot be recycled using dredging vessel based at the port of Rye to recover this material. This would be a far preferable process, without incurring the same disturbance that would be caused by open quarrying sites close to Lydd. It would also be a sustainable way of mineral aggregate supply compared to land-won quarrying.

Tony Hills (KCC Member) – Whilst recognising the pressure that the County is under to supply aggregates for housing building, land won minerals are a finite resource and alternative sources should be considered such as marine dredging. This includes the working of shingle below the high tide mark from where substantial amounts of material can be obtained. Using dredgers is a far faster method of acquiring shingle, causes less costly damage to our highways infrastructure, protecting our communities from untold blight.

Views of Local Residents

Many of the local residents who objected to the proposal did so as part of the Lydd Resident Group; a local action group working alongside Lydd Town Council. In addition to the individual letters received from residents, the Group coordinated a petition objecting to the site on grounds of flood risk, contamination of water sources, increase in traffic and devaluing of local properties. This petition attracted 747 written signatories and 229 e-petition signatories.

Outside of the petition, concerns raised by local residents during the options consultation included:

Concerns raised by local residents during the options consultation included:

- Adverse impact on the local amenity by way of noise, dust and vibrations
- Increased probability of harm through drowning events in created open water bodies
- Adverse impact on property values
- Adverse effect on ability to insure properties appropriately
- Strain on the local highway network that is in poor condition due to current operations using roads not designed for that intensity of HGV use
- Adverse impact on highway safety
- Disruption of the landscape with increased artificial water bodies
- Adverse impact on local water resources
- Adverse impact on flood risk to the area, removal of minerals will reduce groundwater retention and exacerbate flood events
- Increased open water bodies would lead to increased evaporative losses and thus increased saline incursion to groundwater resources
- Alternatives to land-won aggregates exist in the marine area, in particular the accreted materials on the east side of Dungeness, further land-won quarrying that is used for beach replenishment should cease and recycling of this material should be employed
- Climate change effects causing sea level rise could lead to inundation of the quarried areas and causing Lydd town to be surrounded with standing water
- Adverse impact on flora and fauna
- Adverse impact on quality of life and general environmental blight

2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document. The site has also been considered against the requirements of the Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations).

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

There are a number of parcels or cells that form the site where mineral extraction would take place. Some are a considerable distance away from the area of Lydd Town, others are closer, with particular emphasis in this regard is parcel 18 that is very proximate to a residential quarter of Lydd. Given the low ambient noise levels in this open rural landscape there may be impacts on these

properties that would require noise mitigation. The precise form of this is not determined, though the lack of substantive top and sub-soils would preclude extensive sound barrier bunding. Increased stand-offs to reduce noise impacts to the affected residential areas of Lydd would probably be the more effective available mitigation for noise impacts.

It is considered that mitigation would be required, as outlined above, to reduce noise impacts on the residential areas of Lydd that be adversely affected.

With regard to concerns for dust impacts these relate to those that could arise from the quarrying operations and the processing and dispatch of the product. The area is extensive and significant distances would exist for most of the promoted extraction areas, the extraction method proposed is to reduce the water table in the extraction parcel and 'dry cell' with active pumping. As opposed to 'wet extraction' in an open water body. Though 'dry cell' extraction is proposed the material will be semi-wet and thus still in a cohesive state where fines within the sand and gravel would be held together by the moisture and give rise to limited airborne dust impacts. Though, water table fluctuations could change this relationship the low-lying nature of the area would not give rise to very wide fluctuations. It is considered that if not adequately mitigated by quarry maintenance, dust impacts could occur due to dust being 'tracked out' by HGV movements.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

The current planning permission for the existing Lydd works states that there should be no more than 250 HGV movements a day. The County Council as Local Highway Authority are of the view that continuation of this level of intensity over the period of the additional mineral extraction would not warrant an objection to the promoted site, given that it will generate no extra vehicle movements than the permitted quarry development.

This position is caveated by the County Highways Authority being satisfied that the existing minerals working (related to the 2007 planning application) would be fully extracted first and the two implemented planning permissions would not operate at the same time. Moreover, any new planning permission for the proposed extension areas would require a condition to limit the site to 250 HGV movements a day (125 in / 125 out) in order to maintain the same level of intensity. Road maintenance is a matter that the County Council has to respond to in its role as the County Highways Authority when it is determined that road surfaces and or design requires maintenance or change.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

The promoted site would have a limited impact on the PROW network of the area. Also it is considered that any management requirements to maintain public accessibility and safety can be reasonably addressed at the planning application stage. There are no grounds not to allocate the site on the basis of likely unacceptable adverse impacts occurring on any defined PROW.

Landscape, Visual Amenity and Green Infrastructure

The proposed site has been assessed against policy DM11 of the KMWLP which requires that proposals for minerals development do not cause unacceptable adverse impact in terms of visual intrusion. This policy was prepared in line with the NPPF which sets out similar criteria.

Policy CSD4 of the Folkestone and Hythe core strategy 2013 designates the town of Lydd as Green Infrastructure (GI), the purpose of which is to promote opportunities for net gains in biodiversity, and positive management of areas of high landscape quality or high coastal/recreational potential. The proposal has therefore also been assessed in terms of its potential conflict with this policy.

The existing landscape is characterised as flat in nature with extensive open views without significant disruption, though there are man-made structures such as pylons and existing or previous mineral extraction sites. The proposed extension areas are within the existing SSSI with a number of other designated landscapes and habitats in close proximity. The extension sites would be located in closer proximity to the town of Lydd. There are no detailed restoration proposals but the promoter has indicated that following their extraction, the areas would form open water bodies.

Landscape assessment indicates the need for significant screen planting and bunding along boundaries close to residential properties. With variation of the width of screen planting and its location within the boundary area to preventing large linear lengths of planting. Also, a reflection of the 'pocket' woodlands evident locally could be replicated, where possible, and therefore screening should not be uniform in nature and careful consideration should be given to canopy and understory planting mixes that are native to the local area.

However, limited top soil and overburden over much of the site may militate against any extensive screen bunding opportunities. Screen planting may be possible, though variations of salinity of the water table may reduce the opportunity for substantive tree growth in many parts of the shingle ridge and surrounding area. Stand-offs and some planting where possible appear to be the only suitable 'screening' options available. Provided the stand-offs are of a sufficient distance then the operations may be reduced in the expansive landscape such that the impact on the residential receptors could be minimised to an acceptable degree overall.

This is more a matter for detailed consideration for a planning application, though wet land and marginal habitats restoration with native local species, marginal and aquatic vegetation, wetland scrub characteristic of the local area and associated grass and wildflower mixes would enhance biodiversity and could also have an ameliorating effect of integrating the lake margins (that are by their nature artificial) into the landscape.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

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The available geophysical evidence suggests that Romano activity has occurred on the part of the site that includes parcel 23 (Allens Bank) and the possibility of important archaeology of this period is high. Due to the archaeological interest the area was removed from a planning application for mineral development in 1999 and also withdrawn from consideration during earlier work on the Mineral Sites Plan (the site was not included as part of the Preferred Options Regulation 18 Consultation in May 2012). Submitted information does not address the need for a full archaeological evaluation of this sensitive location and due to the likelihood of unacceptable impacts on the historic environment it is therefore not appropriate to allocate this site for mineral working as its deliverability is highly uncertain.

The archaeological potential of parcels 16,17,18, 19, 29, 21 and 22 of the promoted site is less pronounced. Archaeological evaluation can occur at the planning application stage and there are no overriding issues to not allocate these parcels on archaeological grounds.

The County Conservation Officer has raised concerns for impact on the character of the locality and how this would impinge on the Lydd Town Conservation Area. The creation of further open water bodies, an artificial feature, closer to the historic town Lydd Town will need to be screened, if possible, to ameliorate this impact satisfactorily.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

The promoted site is not within the adjacent Dungeness, Romney Marsh and Rye Bay SPA (save for parcel 19 that is coincident with the SPA/Ramsar area). Though is in close proximity and may have indirect impacts arising from any mineral extraction operations. Furthermore, many of the proposed allocations will affect a number of areas of Priority Habitat in the locality. The relevant Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations) make it clear that if a plan or project has the probability of a direct or indirect significant effect on the internationally important interest features of the site, alone or in combination with other plans or projects, then the competent authority must make an Appropriate Assessment (AA) of its implications for the site which takes account of the site's conversation objectives.

Discussions with Natural England have revealed that information provided by the promoter to support the AA process was not sufficient to enable KCC to undertake the AA, in line with an agreed scope and in accordance with the Habitats Regulations. There is particular concern regarding the potential impacts on the designated sites which could result from the proposed de-watering production processes. Such impacts include changes to local ground water conditions (quality and availability) that are still largely unknown, and for which further study is required before it can be concluded that there are no such probability of adverse impact(s). It is considered that the increase in water bodies (formed by the extraction) and the decline in arable fields and vegetated shingle could also have a detrimental impact on the ability of the European sites to provide habitat capable of achieving the purpose (sustaining certain species) for which they were designated.

Much more detailed information would therefore need to be provided before the site could be allocated⁷. Furthermore, in accordance with 'avoid, mitigate, compensate' requirement of the

⁷ See Kent Mineral Sites Plan Appropriate Assessment, Ecus Ltd., November 2018

National Planning Policy Framework and requirements of the Habitats Regulations, alongside consideration of impacts, there would be a need to consider if there are alternatives to the aggregate resource being promoted. An assessment of information regarding alternatives submitted by the promoter has been completed and the findings are set out in Appendix 5. This assessment concludes that it would not be unreasonable for the sharp sand and gravel to be supplied from this location to be obtained from other sources, in particular marine. This conclusion is consistent with policy CSM2 of the KMWLP that recognises the state of resource depletion in Kent and notes that a 7 year sharp sand and gravel landbank can only be maintained for as long as resources allow (see below for further consideration of this matter).

Furthermore, consideration of a mitigation strategy is required that will address such matters of the ecological impacts on the actual areas of proposed extraction. This includes the promoted site's existing ecology (that contains Priority Habitat areas). This being a necessary consideration in addition to the SPA concerns under the Habitat Regulations.

Need for the aggregate mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel⁸. The promoter of the site states that 3.1mt is available for allocation, although this would significantly reduce if Allen's Bank is withdrawn, given the estimated total reserves here being potentially up to 2.75mt. Clearly, there is a need to allocate the site on national mineral planning policy grounds. The adopted KMWLP, however makes it clear that whatever the requirement is [as updated by new Local Aggregate Assessment data] this will be planned for "...while resources allow" see Policy CSM 2 Supply of Land-won Minerals in Kent. Therefore, if the site cannot be allocated, the policy recognises that demand will instead have be met from other sources, "principally a combination of recycled and secondary aggregates, landings of MDA [marine dredged aggregate], blended materials and imports of crushed rock through wharves and railheads. The actual proportions will be decided by the market"

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The area is a low-lying area that has historically been defended against the incursion of the sea, then drained to form arable land behind the cuspate foreland (of Dungeness). Therefore, the land has an inherent potential for flooding that lead to the town of Lydd being historically built on the most elevated shingle ridge.

The extraction of aggregate from the land then become standing water bodies (artificial lakes), increases the flood water storage potential of the land. Though this effect is a marginal one given the limited amount of material removed from the land when compared to the scale of the remaining land volume. However, it can be said that in terms of the probability of flood risk, removal of the aggregates has a neutral impact, and does not an increase in flood risk overall.

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⁸ See Sharp Sand and Gravels Topic Paper 2018

The Environment Agency has reviewed the promotor's consultant report on flood risk (ref. Assessment of Flood Risk Prepared for; Brett Aggregates Limited, SLR March 2018) and has stated:

"The detailed Flood Risk Assessment (FRA) submitted by the promoter demonstrates that the sites lie within an area of Flood Zone 3 (high risk) that presently benefit from the presence of formal flood defences. In light of this residual risk of flooding, the FRA recommends that there should be no stock-piling of material within the floodplain, and that the site is restored to its existing topographical condition once the works are complete. Provided there is no loss of floodplain capacity or alteration of potential flood-flows during or after the mineral extraction, the agency would be unlikely to raise any concerns from a tidal flood risk management perspective. The agency confirm that the area is known to have a high groundwater level, the danger of groundwater flooding in and around the proposed sites has been considered. It is the agency's conclusion that the extraction of the mineral, and the subsequent creation of several flooded pits, will have no substantial consequences and are unlikely to result in an enhanced risk of flooding."

Potential groundwater impacts of concern are: aridification due to 'evaporative losses' and ground water 'draw down' effect from 'dry cell' extraction of the aggregate using active pumping out of the ground water; and a potential adverse impact on groundwater quality due to increased salinity. The impact of this could potentially be to adversely affect water supply and the ecological balance and characteristics of the wider SPA and SSSI areas.

The Environment Agency confirm that the Lydd Storm Beach deposits are a secondary aquifer. They go on to conclude that the aquifer "...is increasingly becoming fragmented and the promoted proposals to extract additional gravel would compound the impact that the previous workings have had on the aquifer in this locality". Therefore, it can be concluded that there has been some impact on this aquifer that would continue with additional workings coming forward.

Brett Aggregate Limited, the promoter commissioned a report by SLR consultants (ref. Preliminary Assessment of Potential Hydrogeological and Hydrological Impacts) to investigate this impact in relation to the promoted method of working the individual parcels of land. With regard to saline intrusion, the report concluded that due to the elevation of the area (low) and the proximity of the coast there is the potential for saline intrusion, subject to the permeability of the strata or geology.

Data collected from the area demonstrates that the Storm Beach deposits are fresh water while the lower permeable Tidal Flat Sand deposits in the area contain saline water from the event of their formation. Data also showed that closer to the coast (in East Sussex) coastal processes have given rise to saline incursion.

The report concludes that saline incursion into the Kent Romney Marsh Groundwater Body is predominantly due to coastal process and the differing permeability characteristics of the deposits. More localised saline impacts may occur if a saline Tidal Flat deposit is in close proximity to a dewatered Storm Beach sand and gravel extraction cell, though the overall low permeability of the Tidal Flat deposits means this would have a more local to extraction impact rather than a general one.

With regard to increased aridification due to draw down effects from de-watering of the extraction areas, the report makes clear that there will be an effect in the Kent area of the extraction sites. The magnitude of impact is still unclear. It recommends a 5-6-year baseline monitoring period is required to be established in the Kent area to understand what impact this would have on groundwater levels.

This lack of available data means that potential groundwater change as a result of the promoted site is not understood at this time.

The Romney Marsh Internal Drainage Board has raised concerns with regard to the potential for evaporative losses to impact the ground water levels and thus increase the aridification effect on the area. The Environment Agency has stated [verbally at meetings] that any enhanced evaporative losses, due to increased lake surface area, would be balanced by direct input by precipitation onto the lakes that is not being intercepted by the land. Thus, a direct and immediate input to ground waters; the overall effect of increased lake area is considered neutral in this regard.

Geomorphology

The proposed site has been assessed against policy DM2 of the KMWLP which requires that development likely to have any unacceptable adverse impact on a Site of Special Scientific Interest, will not be permitted unless the benefits of the development outweigh the impacts. This policy was prepared in line with the NPPF.

The promoted site will directly affect the Dungeness, Romney Marsh and Rye Bay (SSSI) in terms of the geological feature that makes this area important. The shingle ridge is a component part of the evolution of the Dungeness cuspate foreland and may have been part of the barrier beach phase that accreted before the 13th Century. The promoted site would effectively destroy the shingle ridge. Consideration has been given as to whether it might be possible to adequately study the features of the SSSI prior to its removal by the development. This involved consultation with the University of Liverpool which had been instrumental in the designation of the SSSI. It was concluded that refinement of the promoter's proposed methodology for recording the scientific value of the feature appropriately was required. In any event such an impact on a SSSI can only be allowed if the benefits of the extraction outweigh the impact. Consideration of this matter is set out in Appendix 5 and it is concluded that the benefits do not outweigh the impacts and so, on this basis, the site cannot be allocated.

4.0 Conclusion - M2: Lydd Quarry/Allen's Bank Extension, Lydd

The main issues that the promoted site has identified during the detailed assessment process that give rise to concern for the appropriateness of the site for allocation in the Mineral Sites Plan are:

- Impact on the setting and character of the historic town of Lydd
- Severity of impact on the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar Site as a result of this proposed minerals allocation. and the requirements of the Habitat Regulations for consideration of alternatives
- Severity of loss of Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI)
- Importance of and potential loss of the archaeological interests of parcel 23 Allens Bank

Conclusions on these matters are set out below:

The character and overall setting of the historic town of Lydd and its environs would be altered by the progression of aggregate workings progressively working through parcels 16 to 23 with replacement of extant arable land with increasing artificial open water bodies. Screening of the working and mitigation of the change to landscape may not be possible, given the limited available overburden to form effective screening bunds and fact that substantive native tree planting may not be achievable (background groundwater salinity may preclude successful tree growth). However, closer to the

centre of the Lydd area, where there is evidence of more substantive existing tree growth, there may be more potential for planting with native species. It would appear that in order to significantly ameliorate the change to the landscape either reduction of the number of extraction parcels and/or increase stand-offs to the built-up area of Lydd will be needed.

This in turn could have a significant impact on the mineral yield of the promoted Option site and would erode justification for incurring some degree of unavoidable impact on general amenity of the area in order to release aggregate required to support the economy as expected by the NPPF. Overall it is considered that allocation of other sites and the availability of marine won aggregate means there is no overriding requirement to allocate the site and incur the largely unavoidable impact on the character and setting of the historic town of Lydd which be inconsistent with Policy DM 5 Heritage Assets of the KMWLP.

The impact on the SPA is considered to be one of largely an undefined indirect nature and hydrologically based. Adverse impacts on the SPA due to increased aridity and salinity are considered possible. Applying the precautionary principle inherent in the Habitat Regulations requires alternatives to be considered through the AA process. However, the potential hydrological impacts of concern require consideration to ensure that they have been objectively assessed as either giving rise for concern, or that the impacts are minor or absent. The Habitats Regulations require the County Council (as the recognised competent body in this instance) to assess if alternatives to the plan are available – such consideration is set out in Appendix 2 which concludes that alternative sources of supply are available.

With regard for the direct loss of the SSSI feature, it can be concluded that there remains uncertainty as to whether the methodology put forward by the promotor's consultants would be sufficient to address the concerns raised by Natural England and the cautious comments made from the University of Liverpool. Therefore, unless there is an overriding need in the public interest to effectively destroy the SSSI by suppling aggregate materials and thus incur the loss the scientific resource, which is an integral part of the geomorphological evolution of the Dungeness cuspate foreland (and has been designated a SSSI on this basis), then it should not occur. The fact that alternative supply exists(as set out in Appendix 2) demonstrates there is no such overriding need in the public interest at this time.

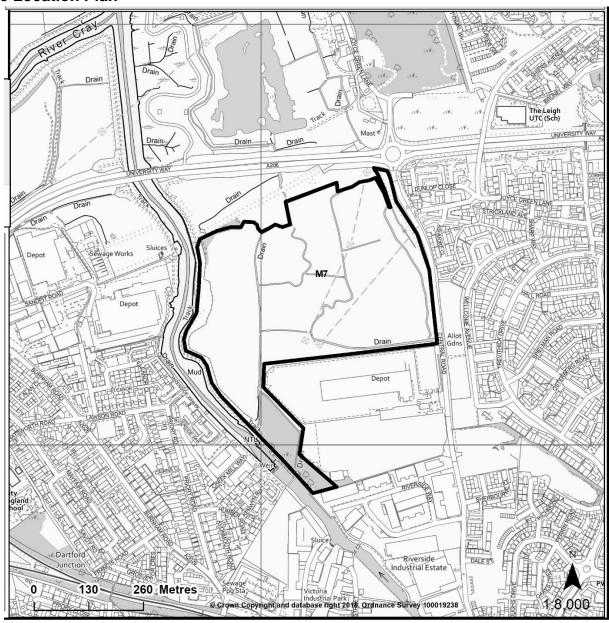
The local socioeconomic effect of Lydd Quarry ceasing operation within two further years will no doubt have an effect, though arguably less than that of the promotor's estimates. Also, of the direct and indirect 54 FTE posts that exist, 31 are HGV related and could continue to operate transporting aggregates to the market from other sources (wharves). Others, including plant operatives, may be re-deployed, particularly at the new aggregate facility at Newhaven when it comes onstream. The effect on the economy of Folkestone and Hythe overall, if the site were to cease operation, appears to relatively marginal. Though the very local impact on Lydd in employment terms is unknown.

The Option M2 Lydd and Allens Bank site is not considered suitable for allocation in the Mineral Sites Plan in that the impacts on the historic town of Lydd, the potential impact on the SPA/Ramsar and SAC that can be negated with alternative aggregate supply that the adopted KMWLP has identified in Policy CSM 2 and loss of the SSSI and the archaeological potential of Allens Bank are not sufficiently justified at this time.

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M7: Land at Central Road, Dartford - Sharp Sand and Gravels

Site Location Plan



1.0 Matters addressed by Detailed Technical Assessment

Initial Assessment

The initial assessment of the site⁹ identified a number of matters which would requiring further consideration, these were:

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 $^{^{9}}$ See Mineral Site Selection – Initial Assessment - Stages 1 and 2 of the Site Identification and Selection Methodology, November 2017

- Impact on landscape
- Impact on biodiversity
- Impact on historic environment
- Impact on water environment
- Impact on air quality
- Loss of grade 2 and 3 quality soil
- Impact on local amenity
- Impact on Public Rights of Way (PROWs)
- Impact on utilities/services
- Impact on Air Quality Management Areas (AQMAs)
- Access impact on highway network
- Cumulative impact with other developments taking place in the area

Matters Raised During the Options Consultation

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency – Object to the site in the absence of information to demonstrate that the ecology of the area will not be adversely impacted. The site is designated as a Local Wildlife Site (LWS), and no information is provided to address this.

This site overlies the chalk aquifer and is in SPZ2 for a public water abstraction borehole. Relevant constraints would be imposed on a specific application for shallow sand and gravel deposits and restrictions on depth of excavations, pollution control methods and ways of working to safeguard against aquifer disturbance, or impacts on water quality, would need to be conditioned in any permission.

Flood defences exist adjacent to the site. Detailed information would be required about the distance of extraction from the flood defences and how any extraction may impact the integrity of the flood defence.

Natural England – the allocation is likely to:

- result in a partial loss of Coastal and Floodplain Grazing Marsh priority habitat.
- have indirect impacts to the adjacent Coastal Saltmarsh priority habitat.
- Result in indirect impacts to the adjacent to Deciduous Woodland priority habitat.

Natural England recommends that further assessment of the potential implications of this allocation on priority habitats/habitats of principle importance is undertaken.

Highways England

Highways England have reserved their final comments to the planning application stage, however have expressed concern with proposals that have the potential to impact the safe and efficient operation of the Strategic Road Network (SRN), in this case the M25 and in particular Junction 1a. Central Road is located approximately some 2km from the junction, access to the site would be

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obtained from Central Road, which adjoins directly to the A206 Bob Dunn Way and then onto junction 1a of the M25.

This area is particularly sensitive for traffic congestion issues which has a negative impact on air quality. As such, several areas around Dartford have been designated as AQMA's, including the Dartford Town Centre which is to the south of the site, and within the London Borough of Bexley to the west.

It recognises that cumulative impacts in terms of increased traffic movements would need to be considered and appropriately mitigated.

Additional details of potential traffic impact have been prepared by the promoter of the site; Highways England has not provided any further comment.

Dartford Borough Council - The site option has identified 23 hectares of fresh marsh land to the south of Bob Dunn Way. It forms part of the Northern Gateway Strategic site in Dartford's Local Plan (Core Strategy, 2011) and is protected through the Local Plan as designated Borough open space (DP24 Development Policies Plan 2017) and a local wildlife site (DP25). The site is identified as an area of green space within the strategic site (Core Strategy Policy CS3). This strategic site has the benefit of planning consents which have largely been built out. Planning conditions set out in one of these consents provides for management and maintenance of the Dartford Fresh Marshes as part of the overall development, through an ecological management plan.

A 25 year plan has been approved and includes conditions to conserve and maintain features of ecological value including the ditch network and wet grassland. This requirement should be noted in technical assessment. The planning status of the site suggests that the 'justified' assessment of this site is considered questionable by the Borough Council.

Dartford Borough Council (EHO) – The site would be accessed via Bob Dunn Way, a heavily trafficked route where nitrogen dioxide pollution levels were recorded at being 46.9 μ g/m3 in 2016 (compared to an objective level of 40 μ g/m3). The proposed site would introduce further HGV movements per day through an area of poor air quality.

The route along Bob Dunn Way would provide access to the A282 (M25) at junction 1a. This junction is often subjected to congestion as a result of incidents occurring at the Dartford crossing and there is concern that drivers would choose to drive through Dartford Town Centre (through Air Quality Management Areas) to avoid this congestion.

There is also concern that noise from the quarrying activities would cause disturbance to residents in Temple Hill.

CPRE – Have serious concerns over the allocation of the site. Southern part of the site lies within the adopted Dartford Core Strategy Northern Gateway Strategic Site. The western part of the site lies within an area designated as a Biodiversity Opportunity Area.

The Darent Valley Footpath runs along the west of the site and extraction will adversely impact on views from the path changing the view from looking over the grazing marsh to open water.

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Kent Wildlife Trust (KWT) - The proposal overlaps with a large area of Local Wildlife Site DA04 "Dartford Marshes". This is a site of County Importance for nature conservation and represents **direct loss** of a large portion of a locally designated site which cannot be mitigated for. KWT strongly object to the allocation as is it is not in conformity with national planning policy or planning guidance.

RSPB - Allocation of the site will result in direct loss of local wildlife sites and therefore RSPB are supportive of the Kent Wildlife Trust's representations on this matter.

British Horse Society – The bridleway to the east of the marshes should be kept and maintained for such use.

Request that diverted footpaths be upgraded to bridleways. Also request that the restoration makes use of the opportunity to provide new rights of way, road side margins and or/enhancement of the existing routes.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice from on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of Elected Representatives

KCC Member – David Butler

Advises that he "raise issues regarding the consultation and any plans to move this forward, and strongly voice my concerns in any form on these sites being used for this purpose.

Dartford North East has the highest traffic volume in the County and is in gridlock on most days due to the Dartford Crossing; for this reason alone it should not be considered a suitable site.

The site is in very close proximity to a housing development, This site has recently had a national TNT depot built and I already receive complaints regarding noise, pollution and overall objections.

Dartford North East has had huge construction activity over the last 5 years and will continue to for the year ahead, this will add more noise and more traffic to an already overloaded network, and a further deterioration to local air quality and overall quality of life for residents in Dartford North East and the wider Dartford.

I urge you to take this into careful consideration"

Dartford Borough Council – Jeremy Kite, MBE, DBC Leader

DBC objects to the potential allocation. There is significant local concern at the intensity of development taking place in the Borough at this time. This is leading to the residents of Dartford experiencing adverse impacts on amenity and quality of life.

The site identified in the Minerals Sites Plan Options consultation is identified as green space in the Dartford Local Plan. As the area of the site is closely related to large development sites which are well advanced, it provides much needed relief for the residents in an area of great change and intense development pressure. The Central Road Site (M7) has been planned as an integral part of the development providing for the open space needs of that scheme.

The open space needs of the local community appear not to have been taken into account. The potential loss of the open space and extraction activity in close proximity of the residential area is inherently unacceptable to the amenity of these residents and the wider community of the Borough. Inevitable dust and noise from the extraction would be compounded by pollution from the HGV's transporting materials from the site, in an area which already suffers from heavy congestion and Air Quality Management Area (AQMA) pollution level exceedances.

It is understood that mineral extraction has to take place to meet needs of society, however questions whether it is right that it is proposed within the densest and fastest growing part of Kent, where transport and development pressures are reaching capacity.

It is considered unacceptable that the small district of Dartford should have to be responsible for providing 25% of the required aggregates supply for the county whilst making an extensive contribution to housing delivery. It is not possible for the area to meet these competing and intensely impacting forms of development. The Mineral Sites Plan is being prepared in an uncoordinated manner with regard to the wider planning of the area given current National Planning Policy, however the Mineral Sites Plan cannot be prepared in a vacuum and the wider planning issues must be taken into account in preparing this Plan.

Views of local residents

Concerns raised by local residents during the options consultation included:

- Adverse impact on the local amenity due to noise, dust and vibrations
- Adverse local health impacts
- The cumulative impact with other development pressures in the area (including quarrying) will have an adverse impact on residential amenity
- General environmental blight would be caused to the area
- Adverse impact on already highly stressed highway network would be unacceptable
- Proximity to the M25 and QE2 bridge mean that any additional traffic would be unsustainable
- Adverse impact on air quality
- Contrary to the regeneration agenda for the Dartford area
- Adverse impact on human health
- Disruption to PROW (public access riverside walk)
- Skeptical about the quality of any restoration
- Increased local Flood Risk
- Does not conform to planning policy on the management of marshland
- Adverse impact on flora and fauna of the site
- Marshland should be protected
- Designated as a local wildlife site and should be left undisturbed
- Visual amenities of the undisturbed expansive open space should remain
- Serves as green space which should be protected
- Loss of property value in the locality of the site
- Site is of archaeological importance

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2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

The site is surrounded by residential properties on its eastern and western boundaries, some of which are 50m away from the site. These are likely to be negatively impacted by way of noise and dust from the quarrying activities and the associated HGV movements. Concern in respect of amenity impact were expressed in many of the representations received. Potential disturbance to amenity was also raised by Dartford BC's Environmental Health Officer (EHO). The promoted site forms part of the open space requirements for strategic development that has taken place in the area. Its long-term protection from development is a significant part of the Borough's adopted local plan amenity provisions.

In respect of noise, the County Council's noise consultant (Amey) advises that mitigation by way of stand-off and screening would be required to address noise impacts, and that in principle acceptable levels of noise should be achievable.

With regard to dust and air quality considerations, the County Council's air quality advisor notes that as extraction would be from marshland the sharp sand/gravel is likely to be wet which will aid dust suppression. Extraction activity could however be constrained by existing residential receptors on to the east and west of the site which are sensitive to deposited dust and that Dartford is subject to AQMAs across the Borough which could constrain access to the site. Attention is drawn to traffic congestion in the locality which leads to a considerable number of HGV vehicles idling on local roads. Concerns regarding the impact on air quality through HGV movements are identified and that these impacts may be unmitigable.

Dartford Borough Council's EHO similarly raises concerns regarding the impacts on air quality, particularly if the vehicles were to choose to travel through the AQMA to avoid the congestion along Bob Dunn Way. The site would have to be accessed via Bob Dunn Way, a heavily trafficked route where nitrogen dioxide pollution levels were recorded at being 46.9 μ g/m3 in 2016 (compared to an objective level of 40 μ g/m3). The route along Bob Dunn Way provides access to the A282 (M25) at junction 1a. This junction is often subjected to congestion as a result of incidents occurring at the Dartford crossing. There is concern that HGV drivers would choose to drive through Dartford Town

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Centre (through AQMA) to avoid this congestion. As a result, the proposed site would result in additional HGV movements through an area of poor air quality.

The site lies in close proximity to the County boundary with the London Borough of Bexley lying to the west. The entire Borough is designated an Air Quality Management Area. Traffic leaving the site and travelling westwards into Bexley would pass through the Bexley AQMA.

Visually, there would be a significant change to the appearance of the landscape which would be difficult to mitigate, given the proximity and height of residential property (which includes 3 and 4 storey apartment blocks) that overlook the site. Clear views of operations are likely to be available from these properties, and from the public rights of way that run around the eastern and western boundaries of the site. It is unlikely that the adverse effects from such change in view could be adequately mitigated against, due to the height of property windows and the lower level of the site than the surrounding land.

Restoration of the site would involve loss of the marsh area and the opening up of open water bodies and in the extraction phase, there would be a loss of the strategic open space and consequent impact upon local amenity.

In conclusion, the close proximity to a large residential area the lack of certainty concerning the ability to mitigate amenity impacts to acceptable levels presumes against allocation of this site.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that mineral development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

Locationally, the site would access a strategically important part of the national road network (M25/J1A Dartford Crossing), which is particularly sensitive to congestion. KCC Highways as local highway authority objects to the proposed allocation. It advises that the local highway network in this location is extremely sensitive and any impact to the network and the air quality must be mitigated. Additional information is required before the Highway Authority can be satisfied in principle that the allocation is acceptable, given the air quality sensitivities in Dartford and around Junction 1. This includes:

- A capacity assessment of the Bob Dunn Way/Joyce Green Lane/ Central Road roundabout that takes account of the committed development of the recently approved application: KCC/DA/0320/2017, Joyce Green Quarry, Joyce Green Lane, Dartford, Kent, DA1 5PN.
- Further details of the access arrangement details to ensure a safe suitable point of access can be achieved, with appropriate visibility splays to be provided. Pedestrian and cycle access must also be considered when designing the access.

This information has not been provided and in the absence of this detailed information, the impact on the local highway capacity cannot be fully assessed.

Highways England have advised that any mineral site allocations need to ensure that they do not impact the safe and efficient operation of the SRN, in this case the M25 and in particular Junction 1a. It is noted that Central Road is located approximately some 2km from the junction and that access to

the site would be obtained from Central Road, which adjoins directly to the A206 Bob Dunn Way and then onto junction 1a of the M25. This area is particularly sensitive for traffic congestion issues which has a negative impact on air quality. As such, several areas around Dartford have been designated as AQMA's, including the Dartford Town Centre which is to the south of the site, and within the London Borough of Bexley to the west. Note that the air quality is considered in the amenity section above.

In light of the Highway objection, the County Council considers that even modest traffic increase will have potentially sizeable impacts on traffic conditions and air quality, particularly when viewed cumulatively with other planned development in the Dartford Local Plan. The site cannot therefore be considered suitable for allocation as a mineral extraction site.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets. This policy was prepared in line with the NPPF which sets out similar criteria.

The site is grazing marsh, a priority habitat and a habitat of principal importance under the Natural Environment and Rural Communities Act. It is also identified as a local wildlife site – Dartford Marshes and is considered to have national importance for its water vole population. The site currently supports a wide range of flora and fauna, including a number of rare plant species, important wintering and breeding bird populations and water voles. The proposal would result in potential loss of the Coastal and Floodplain Grazing Marsh Biodiversity Opportunity Areas (BOA) Priory habitat. Development is also likely to have indirect impacts on the adjacent coastal saltmarsh and deciduous woodland priority habitats.

The promotor submitted information on ecology and how the potential impacts would be mitigated. This report demonstrated the ecological importance of the site and suggested two options for mitigation, these were the creation of off-site wetland habitat (unspecified) within existing local grazing marsh or the implementation of a phased approach with mitigation on-site (by enhancing the retained habitat). The report also committed to the reinstatement of the grazing marsh on completion of the works, though the site itself would have new open water areas and thus a net loss of current grazing marsh area.

The Council's Biodiversity advisor, however remains concerned that there is no available land to create an off-site wetland habitat and due to the ecological interest of the site, it will be difficult to mitigate for the loss of the habitat within a smaller proportion of the site (even with enhancements). The mitigation area is likely to be damaged during the extraction works due to the size of the site. It concludes that mineral extraction at this site would result in the loss of this important habitat, which is one of the last of its kind in Kent.

It is noted that the Environment Agency objects to the allocation due to the impact on biodiversity. Furthermore, whilst not the statutory body for local designations, Natural England recognised that the site would impact on several areas of priority habitat and recommended that high level ecological survey work be undertaken.

The County Council concludes that the impact of the proposal on biodiversity interests is significant, as such the site is not acceptable in principle to allocate.

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Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The use of wet working negates the need to de-water the active quarried area.

Flood risk

The site is within Flood Zone 3 (1% or 1 in 100 annual probability of flooding). The Environment Agency made no adverse comments regarding flood risk, acknowledging that sand and gravel extraction represents a "water compatible" development and would not increase the overall flood risk characteristics of the site and the wider area. Further information, detailing how the proposal could impact the integrity of nearby flood defences would be required should the site be allocated.

The County Council's Flood Risk Assessment carried out in July 2018, recognised that the land drains present on site may need to be diverted to facilitate the development, and that the land drain to the eastern boundary of the site should be retained. The report concluded that further hydraulic modelling would be required to establish the impact of the development on the wider water environment. This view was shared by the Environment Agency who requested further information on the hydraulic relationship of the site on the River Darent and the wetland/marshland to the north of the site.

The site overlies a chalk aquifer and is in SPZ2 for a public water abstraction borehole. The site is bounded in the west by the River Darent. Should the site progress, evidence would be necessary at planning application stage to demonstrate that the hydrology and water quality of the river will not be affected by mineral extraction operations or restoration plans, that activity would not affect the aquifer or its water quality and that appropriate pollution control measures could be employed

The County Council concludes that the information requested to establish the impact on the water environment is a matter that could be addressed at planning application stage. In principle, there is no overriding water resource interest that renders the site unsuitable for allocation.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

The Council's Archaeological Officer considers that there is potential for Palaeolithic remains associated with prehistoric activity. Further work is required to establish the potential importance of any remains and the acceptability of any mitigation. In the absence of this, it is not possible to demonstrate compliance with policy requirements. Normal planning permission conditional precommencement controls would be able to ensure that any such remains are investigated appropriately

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Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

The County Council's land stability report includes consideration of the site's proximity to sensitive receptors such as sewage lines, electricity pylons and Thames Water Infrastructure. It concluded that the site itself was considered to have low risk of instability, however with extraction this risk is raised to moderate in terms of the site itself and neighbouring properties. Neighbouring infrastructure could be impacted such as the electricity pylons within the site, the Darent River Levees Sewer, Bob Dunn Way Embankment and Thames Water Infrastructure. These features could be mitigated with appropriate standoffs and diversion where necessary. Details of which could be a matter for any planning application stage. An application would need to be accompanied by a quantitative slope stability assessment.

In conclusion, there is no overriding case not to allocate the site based on land stability matters at this time.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

A public bridleway (DB4) sits to the east of the site. This is separated from the site area by Central Road, so is unlikely to be directly impacted by the proposals, however its setting will be affected. Public footpath DB1 runs along the western boundary (following the course of the River Darent) of the site which is more likely to be affected. Mitigation would need to be employed in both cases, most likely a combination of screening and stand offs, although it is recognised that it is unlikely that views into the site from the paths can be fully mitigated.

KCC PROW officers have made no adverse comments on the proposal, and as such the County Council concludes that the impact on PROW's does not constitute a reason for not allocating the site.

Landscape

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no acceptable adverse impacts on important landscapes. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that minerals development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The site forms part of the Northern Gateway Strategic site (NGSS) in the Dartford Local Plan (Core Strategy, 2011) and is protected as designated Borough Open Space (policy DP24) in the Development Policies Plan 2017 and a local wildlife site (policy DP25). The site is also identified as an area of green space within the Strategic Site to which Core Strategy Policy CS3 applies. The NGSS site now has the benefit of planning consents which include the area of the Dartford Fresh

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Marshes. The consents have largely been built out, leaving the remaining area to form an important and protected undeveloped area within the local landscape. The Borough Council has secured a long term management plan to ensure that the land is secured for the open space requirements to support the urban growth in this part of Dartford. This agreed 25 year management plan requires the conservation and maintenance of features of ecological value including the ditch network and wet grassland.

The County Council's landscape advisor's consider that development of the site would have a significant impact on the priority habitat inventory and local wildlife site designation. Any habitat creation through restoration and careful choice of planting and landscape design would enable the adverse effects caused by the extraction activities to be mitigated. However, there is significant doubt that the proposed ecological imitation in the restoration plans proposed would be appropriate given the LWS designation. Whilst, in the longer term, mineral extraction would enable the land to remain open and free of built development, the landscape would be significantly altered reducing its local value that the local plan strategy has identified. On this basis, the County Council considers that the mineral development of the site would be contrary to the objectives of Policy CS3 of the adopted Dartford Borough Local Plan.

The County Council concludes that the impact on the local landscape would likely to be negative, in that the inevitable change to the landscape would not be enhanced by increased ecological value and the site's local landscape value, as undisturbed open space, would have been significantly eroded and would not be in accordance with Policy DM2 Environment and Landscape Site of International, national and Local Importance.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes possible. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site comprises grade 2 (very good) and grade 3a (good to moderate) agricultural soil. If the site is worked the soil quality will be lost if restoration is proposed to be to wetland habitat. The site is however in use as marshland and as considered above has an important open space function to support urban growth within the Dartford area. Mineral development at this site is unlikely to result in an overriding loss of agricultural soils.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised that mineral working has taken place in the surrounding area of the Darent Valley in the past, with particular regard to the ongoing quarrying operation at Joyce Green Quarry, immediately to the north of the promoted site. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. In this instance, the assessment of potential cumulative impacts which could arise from development in this location relate to the impacts from HGV movements and the

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consequential impact on air quality. From the evidence available these would give rise to unacceptable cumulative impact.

Need for the Mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel¹⁰. The yield from this site is estimated to 0.9m tonnes which would make a significant contribution to supply requirements.

Whilst it is recognised that there is a need to allocate the site on national planning policy grounds in respect of mineral need, the adopted KMWLP Policy CSM2 makes it clear that the requirement will be planned for ".... while resources allow". It therefore follows, that if the site is unacceptable in principle and cannot be allocated, the adopted policy recognises that demand will be met from other sources. These are principally a combination of recycled and secondary aggregates, landings of MDA (marine dredged aggregate), blended materials and imports of crushed rock through wharves and railheads. The actual proportions will be decided by the market.

4.0 Conclusion - M7: Land at Central Road, Dartford

The information submitted in support of this promoted site is limited. Whilst some matters are capable of being addressed in detail at the planning application stage, the County Council considers that from the information available, the site gives rise to unacceptable impacts on a number of key matters. In particular, these relate to highway impacts on Bob Dunn Way (A206) and the M25 Junction 1a (Dartford Crossing), loss of biodiversity habitat, impact upon Local Wildlife Sites (LWS) and UK Biodiversity Action Plan (BAP) interests, impacts on residential amenity, air quality impact on AQMAs and conflict with Local Plan open space objectives

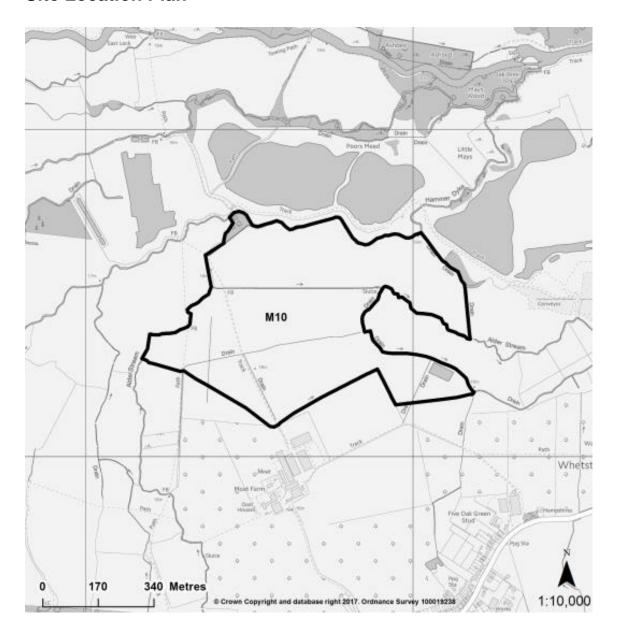
The County Council is therefore unable to conclude that the M7 site At Central Road, Dartford is acceptable for allocation. The site is not identified as a site in the Pre-Submission draft of the Mineral Sites Plan.

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¹⁰ See Sharp Sand and Gravels Topic Paper 2018

M10: Moat Farm, Five Oak Green, Capel – Sharp Sands and Gravels

Site Location Plan



1.0 Matters addressed by Detailed Technical Assessment

Matters Identified by the Initial Site Assessment

As set out in section 3 of this report, the initial assessment of the site identified a number of matters which would require further consideration, these were:

- Impact on landscape and the High Weald Area of Outstanding Natural Beauty (AONB)

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- Impact on biodiversity
- Impact on historic environment
- Impact on water environment

- Loss of grade 3 quality soil
- Impact on local amenity
- Impact on the Green Belt
- Impact on Public Rights of Way (PROWs)
- Cumulative impact with other developments and quarrying operations within the area

Matters Raised During the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency (EA)

Biodiversity: The Alder stream passes through the middle of this site. The EA would oppose the creation of online lakes [that would have continuity with the Alder Stream (KCC)]. There is the potential for river restoration to be delivered as part of the exploitation of this site subject to other concerns including flood risk. Further information required about the proposal to be able to assess it fully.

Groundwater: The site overlies the gravel aquifer and is near the edge of an SPZ3 for a public water abstraction borehole. Relevant constraints would be imposed on a specific application for restrictions on depth of excavations, pollution control methods and ways of working to safeguard against aquifer disturbance or impacts on water quality.

Water Resources: The site poses no immediate Water Resources risk provided that the final restoration plan fully recognises the need to ensure that the Alder Stream's function, alongside smaller ditches and ditches, are retained.

It is anticipated that appropriate mitigation measures, substantiated through a detailed programme of monitoring, will be necessary in order for the applicant to demonstrate with certainty that the Moat Farm workings, both during the operational and restoration phases do not have a detrimental impact.

The hydraulic relationship between the previously worked excavations [now flooded], to the immediate north and the local drainage ditches, some of which may be ephemeral will need to be verified. This need is particularly relevant should dewatering be employed and as such the applicant will need to develop a sufficiently robust mitigation plan so as to ensure that local levels are not compromised to the extent that water dependent ecosystems are derogated.

The restoration plan indicates an ambition to restore to phased wetland. There will be a need to demonstrate how the wetlands will be managed so as not to compromise the integrity of the Alder Stream and the function of those unnamed drainage ditches in the immediate vicinity of the site.

A Licence will be required from the Environment Agency, should there be a requirement to dewater at Moat Farm.

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Given that the site is also within an aquifer SPZ waste activities are to be avoided.

Flood Risk: The site falls within a High Risk Flood Zone (FZ3). The aggregate materials should be extracted in a way which does not increase flood risk. A detailed Flood Risk Assessment, approved by the EA, must demonstrate that development would not increase flood risk to the area.

Natural England – The site does not fall within any SSSI/protected landscape impact risk zones so is unlikely to impact any statutory designated nature conservation sites or protected landscapes. It is considered that there may be an opportunity to restore the site to wetland/open water habitat.

Tonbridge and Malling Borough Council

Cumulative impacts: In this part of the borough the concern is the cumulative impacts of several sites operating at the same time which could be severe if not properly planned for and managed. Of particular concern is the cumulative impacts of noise, dust and vibration from the mineral operations and transportation on the amenity of nearby residents. In addition, cumulative impacts on flood risk, including surface water flooding should be assessed. Options for minimising these impacts and preventing unacceptable adverse impacts need to be fully explored.

Landscape: The sites lie within close proximity of the High Weald AONB and there are several longrange vistas that can be enjoyed from the vicinity of the site. It is important that these are respected during the operation and restoration of the sites and that unacceptable adverse impacts are prevented.

Heritage: There are Listed Buildings within close proximity of the site. Every effort should be made to protect these important heritage assets and their settings and unacceptable adverse impacts should be prevented.

Tunbridge Wells Borough Council (TWBC) - TWBC is concerned that current development and future growth will be impacted by the mineral extraction activity from this site. TWBC have particular regard to the following, both in terms of the impact of the site and in terms of cumulative impact, they are:

- Transport links, including highway safety and the operation of the highway network.
- Residential amenity, including in terms of impact via noise, dust, vehicle movements, air quality, vibration, etc;
- Landscape impacts, including the setting of the High Weald Area of Outstanding Natural Beauty;
- Heritage: there are areas of potential archaeological importance within the vicinity of the allocations, as well as a number of Listed Buildings (some of which form part of historic farmsteads), the settings to which are important;
- Ecology, including Local Wildlife Sites;
- Trees, including areas of Ancient Woodland;
- Flooding, both in terms of surface water and groundwater;
- Pollution, including in terms of the aquifer protection zone;
- Impact on the Green Belt, particularly having regard to the potential growth through the new TWBC Local Plan.

South East Water (SEW) - The quality of the water abstracted in the vicinity of the water courses close to the site should not be impacted. Further hydrological assessment was undertaken for the adjoining Option site (M13 Stonecastle Farm) to address if extraction of the mineral resources posed

any risk of adverse impact to the potable supply which addressed SEW's concerns in principle.

CPRE Kent - allocation opposed on the following grounds:

- This is a remote and isolated site for which access will be difficult;
- Impact on local roads and neighbourhood from HGVs;
- Impact on public right of way;
- Potential visual impact from the High Weald AONB;
 No details of any buildings and processing plant which may impact the openness of the Green Belt and so be in conflict with national Green Belt policy.
- Negative cumulative impact taking account of the Stonecastle Farm site. Consideration should be given to restoring the site to agriculture.

Kent Wildlife Trust -

- Detailed mitigation strategies required to avoid any negative impact upon biodiversity will be required with any planning application. Where this mitigation is not possible, or it is not possible to avoid negative impact through mitigation measures then a compensation package must be provided and detailed in advance of any planning approval.
- NPPF requirement for enhancement of biodiversity should be sought wherever possible as well as "net gain" for wildlife.
- Reference should be made to Biodiversity Opportunity Areas when restoring land after mineral extraction to help focus habitat creation on habitats and species of County importance.
- The opportunity for habitats of nature conservation interest created by wet restoration should include consideration of future management after the site has been restored, including the financial information relating to long-term management.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received has informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of local residents

Concerns raised by local residents during the options consultation included:

- Adverse impact on the local amenity by way of noise, dust, visual intrusion and vibrations
- Adverse impact on the historical assets and the archaeology of the area
- Strain on the local highway network, local roads are too narrow and unsuitable; the continued use of the access onto the A228 Whetsted Road is unacceptable
- Disruption of the landscape and on the High Weald AONB
- Adverse impact on the Green Belt
- Adverse impact on local water resources
- Adverse impact on flora, fauna and fragile geological interests

- Lack of economic viability of mineral deposit
- Adverse impact on quality of life and a cumulative impact with other workings that is unacceptable
- Poor restoration record at nearby sites, reed bed planting along artificial lake margins are a significant change to the landscape
- Adverse impact on PROWs

2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

The site is remote from any main areas of local residential receptors. The nearest dwelling is Moat Farm to the south around 200 metres away although it is screened by existing farm buildings. There are some agricultural workers' residential caravans within Moat Farm which would be within 50-60 metres from the site.

It is recognised that air quality is good and local sources of pollution are largely confined to agricultural sources and local road traffic. There are receptors on Whetsted Road to the south (500m), but such is the distance any dust transported off-site would be well dispersed. Generation of dust is expected to be minimal from extracted sand and gravel particularly if transported in enclosed conveyors. In addition, the mineral would be wet worked and thus would be self-mitigating in dust generation terms at the point of extraction. Also, the mineral would be transported northwards to the processing plant at the adjoining site (Stonecastle Farm) away from the seasonal worker accommodation at Moat Farm.

The ambient noise climate is likely to be low due to the remoteness and any mineral development may require mitigation to eliminate potential adverse noise impact particularly with regards to the agricultural workers' accommodation. Consideration will need to be given to the site access and haulage routes in order to avoid adverse noise impact from HGVs passing through Five Oak Green and Whetsted which may be problematic due to the local road network not being appropriate for HGV use. Overall it is considered unlikely that noise impacts would cause any unacceptable impacts on the local amenity.

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The cumulative impact of emissions from the increase in HGVs at Stonecastle Farm Quarry to where the extracted material will be conveyed would be required. The protection of health and amenity from HGVs is considered to be fully achievable. It is considered that appropriate mitigation against any potential adverse impacts from extraction operations are fully achievable.

It is concluded that mitigation is likely to be achievable, and it is unlikely that any amenity impact would be so severe that the site should not be developed.

Note that consideration of impacts on visual amenity are considered below.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

Provided any extraction at Moat Farm (where use of the adjoining Stonecastle Farm Quarry processing site and access to the Whetsted Road will be required) is not concurrent with extraction of any reserves at Stonecastle Farm, does not exceed the current level of permitted extraction-and trip rates are no greater than the existing planning permission at the Stonecastle Farm site, the highway impacts of the site would be acceptable.

The Council's assessment of the potential impacts on highways and transportation concludes that there are no highways grounds to prevent allocation of the site.

Landscape and Visual Amenity

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no acceptable adverse impacts on important landscapes, including the High Weald AONB, and sets out the circumstances where impacts upon them would be acceptable. Policy DM2 notes that proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the natural beauty of the AONB. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that minerals development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The High Weald AONB is located approximately 1.8km south of the site.

Assessment of landscape impacts concludes that given the nature of proposed activities at the site; excavation below existing ground levels, elements of plant that are relatively low in height, and the character of the AONB itself (extensive dense tree cover), there are expected to be few, if any, locations within the designation from which views of development at the site would be available. As changes at the site are unlikely to have any notable influence upon land within the AONB boundary, it can be reasonably concluded that the presence of minerals extraction operations at the site would not materially affect the statutory purposes and special qualities of the High Weald AONB. The High Weald AONB unit has not raised any concerns.

As proposals for the site are developed in greater detail at any planning application stage, mitigation measures intended to reduce or prevent adverse landscape and visual effects should be incorporated into the design of such proposals. Particular focus will have to be given to minimising adverse visual effects from the property at Moat Farm, and those properties to the south and east

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where views into the Site are anticipated to be available.

Overall the County Council considers that subject to certain matters being satisfactorily addressed at the planning application stage, the site is acceptable in principle on landscape grounds.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

The site is bordered to the north-west by Ancient Woodland with further Ancient Woodland within 500m of the site to the south-west.

It is considered that the fields may be utilised by ground nesting birds/wintering birds and the site boundaries may contain suitable habitat for breeding birds, reptiles, and water voles. The site has some potential to impact habitats for protected/notable species, but it is limited, and appropriate mitigation can be implemented. Therefore, information assessing the ecological impact can be addressed as part of any planning application.

There would need to be an appropriately sized buffer between any extraction area and the Ancient Woodland. Again, this could be addressed within any planning application.

It is concluded that the area is of limited ecological value and any adverse impacts could be addressed during the normal planning application stage which considers mitigation measures. Stand offs to protect the Ancient Woodland to the north of the site would address the Environment Agency's concern for any incursion to the stream that bounds the northern area of the site.

Overall, the County Council does not consider there to be any biodiversity grounds to prevent allocation of the site.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

Moat Farm is a listed building and the setting and character of this heritage asset will require to be assessed to ensure the building and its setting are not significantly adversely affected. Given that there is an at least 170m separation between the nearest boundary of the site (not necessarily active workings) largely reduces the impacts that could be regarded as adverse to the integrity of the building. In the longer term, the wetland restoration will alter the character of the setting of the building. Provided landscaping of created lake margins are undertaken sensitively e.g. with native planning, this change is unlikely to be entirely incompatible with this heritage asset.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

The Council's Archaeological Officer considers that there is potential for Palaeolithic remains within the sediments that make up the sand and gravel deposit to be present. Normal planning permission conditional pre-commencement controls would be able to ensure that any such remains are investigated appropriately.

Need for the mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

The deposit in this location constitutes river terrace sand and gravels.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel¹¹. The yield from this site is estimated to be 1.5 million tonnes which would make a significant contribution to supply requirements.

British Geological Survey data indicates that terrace sands and gravel is an economic mineral. The actual economic viability of any one particular deposit largely depends on the local economy and specification for quarried materials supply. While the material may not currently have significant market demand, workings have occurred in the past in the locality and thus the economic viability of the deposit may improve, particularly as other land-won resources are increasingly depleted.

Green Belt

The proposed site has been assessed against policy DM4 of the KMWLP which states that development within the Green Belt will be considered in light of its potential impacts and shall comply with national policy and the NPPF policy on Green Belt.

The site is within the Metropolitan Green Belt. Mineral extraction is not considered on its own to be inappropriate development, however structures such as bunds, plant and machinery which may impact of the openness of the Green Belt can be considered to be inappropriate development.

The arrangement with regards to plant and machinery are known, in that they will not be on the site and any screening bunds will not essentially be required. Restoration is proposed to open water.

As such, it is concluded in principle that, as the mineral extraction is not inappropriate development and such development in this location would preserve openness and not conflict with the purposes of including land within the Green Belt, allocation of this site would not conflict with policy on Green Belt.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The use of wet working, that being the extraction of materials from below the water table level, negates the need to de-water the active quarried areas and thus there would be no increased turbidity (and suspension of sediment) in the abstraction water column that South East Water Limited have expressed concern over. Provided this method of extraction is secured at any planning application stage and a monitoring regime imposed by condition of that consent as agreed with SE Water and approved by the County Council there are no grounds to resist the allocation of the site. Such matters are normal to detailed planning application stages of mineral development.

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¹¹ See Sharp Sand Topic Paper, 2018

Flood risk

The EA have stated that any proposals must be accompanied by a detailed Flood Risk Assessment which demonstrated the activities to be undertaken do not increase flood risk to the area, this must be approved by the EA. This is normal for mineral development at the planning application stage. The Strategic Flood Risk Assessment for the site shows that the majority of the site is located within Flood Zone 3 – an area considered to be at flood risk with a 1% (1 in 100) or greater annual probability of fluvial flooding. Land in the south-eastern extent of the site is located within Flood Zone 2 – an area considered to be at flood risk with between a 1% and 0.1% annual probability of flooding.

The area which is low lying within a flood plain is inherently susceptible to flooding. Mineral development, however is not a form of development that is highly sensitive to flooding (unlike residential development). Mineral extraction in a flood plain, when left as an open water body on restoration, is essentially neutral with regard to whether the activity increases flood risk.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes possible. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site comprises grade 3b agricultural soil which is considered to be moderate soil which has limitations on the range of crops it can yield. Furthermore, due to the limited size of the site it is not considered that development in this location would lead to a significant loss of agricultural soils.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

Footpaths WT159 and WT158 cross the western extent of the site, while footpath WT169 runs along the southern boundary of the site. It is considered that although, the two footpaths located on site would likely require extensive, and potentially permanent diversion (as the proposed site restoration is wetland habitat) this does not preclude the site form being allocated.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised other proposed site allocations for mineral working are in the surrounding area. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. The assessment of potential impacts which could arise from development in this location has not revealed that unacceptable

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cumulative impacts would arise that could not be satisfactorily mitigated against, however cumulative impacts will require further consideration if a proposal were to come forward.

4.0 Conclusion - M10: Moat Farm, Five Oak Green, Capel

It is considered that the volume of sharp sand and gravel needed to meet KMWLP requirements can be supported by allocation of the M10 Moat Farm site. It is considered that adverse impacts associated with mineral development in this location can be addressed and satisfactorily mitigated through the normal planning application process, seeking further views of consultees and technical advice where appropriate.

Therefore, it is considered that the site should be allocated with a requirement that any application addresses development management policies, with particularly reference to the following considerations:

Transport

- A detailed transport assessment to demonstrate compliance with KMWLP policy DM13.
- Mineral must be removed from the site via the Stonecastle Farm site to the north such that
 access onto the highway network is achieved using the existing and approved access for the
 Stonecastle Farm Quarry.
- The site shall only be worked sequentially to the permitted phases at Stonecastle Farm Quarry or the Moat Farm Quarry (should planning permission be granted for this latter site).
- To avoid unacceptable impacts on the local highway network the M13 Stonecastle Farm Extension, the Moat Farm Site (M10) and the permitted Stonecastle Farm Quarry shall not be worked concurrently.
- Proposals for the diversion for PROW will be required which show how connectivity of the surrounding PROW network will not be lost.

Water Resources

- A 16 metre buffer should be provided between extraction and nearby watercourses to alleviate flood risk in the area. Furthermore, should the Alder Stream require diversion, this should be subject to EA approval and hydraulic modelling must be undertaken to inform the diversion route and the potential impact on flood risk elsewhere.
- Any restoration works should not include raising the ground levels over existing levels as this will have an adverse impact on flood risk. Wetland restoration is preferable.

Biodiversity

- Any proposal would need to be accompanied by a detailed ecological appraisal setting out any mitigation measures needed to ensure there are no unacceptable impacts on Kent's biodiversity assets
- Any operations should exclude the Ancient Woodland and a suitable buffer should be employed as to not impact on the designation directly or indirectly.

Health and Amenity

- Compliance with policy DM11 of the KMWLP in respect of health and amenity.
- A lighting, noise, dust, odour and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management

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plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance).

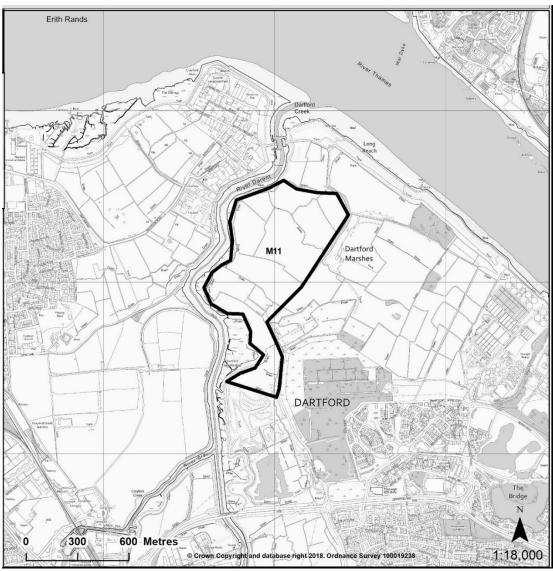
Heritage

- There is potential for Palaeolithic remains within the site. Therefore, any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of such remains.

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M11: Joyce Green Farm Quarry Extension, Dartford - Sharp Sand and Gravel

Site Location Plan



1.0 Matters addressed by Detailed Technical Assessment

Initial Assessment

The initial assessment of the site identified a number of matters which would require particular consideration, these were:

- Impact on landscape
- Impact on biodiversity
- Impact on the historic environment
- Impact on the water environment
- Impact on air quality
- Loss of grade 3 agricultural soil
- Impact on Public Rights of Way (PROWs) and their setting
- Impact on the highway network

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- Impact on health and amenity
- Cumulative impact with other development in the area
- Site is within the Green Belt

Matters Raised during the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency (EA) – Object /Raises concern/objection in respect of ecological impacts, groundwater, water resources and flood risk:

Ecology

Objection, without further information being presented as to how the impacts of this development can be adequately mitigated. The site contains significant lengths of ditches and provides an important range of habitats as part of the Local Wildlife Site (LWS).

The EA considers that in order for the site to be allocated, the site would require the re-creation of ditches in order to accommodate protected species and provide important habitats integral to the Local Wildlife Site designation. The EA considers that it is unclear how this can be achieved and that further information is required to demonstrate that this site is suitable for mineral extraction.

The EA disagrees with the initial site assessment (RAG) rating in respect of the sustainability assessment - while the objective to have no impact on important elements of biodiversity and where possible positively contribute to the Kent Biodiversity Action Plan (BAP) is good, it is not possible for this to be achieved (on the information available) within the boundary of the site. Therefore, the RAG screening and comments associated with it are not accurate. No information has been provided as to how mitigation can be delivered, thus the site should score as 'red' until this is provided and found satisfactory.

Groundwater

Sampling of the made ground should be carried out to prove that the ground is clear of leachable contamination, which may impact local water quality if the ponds increase outflows from underlying materials.

Pollution prevention measures that reflect best practice will be required to protect water resources.

Water Resources

The EA considers that the proposed excavation of mineral at Joyce Green Quarry poses a Low Water Resources risk. It is anticipated that appropriate mitigation measures, substantiated through a detailed programme of monitoring, will be necessary in order to prove beyond reasonable doubt that the quarry activities do not have a detrimental impact on the following aspects;

how the Dartford Marshes will continue to function hydraulically, following the extraction
of mineral, recognising that the creation of a lake will cause a significant change to the
local hydrology, relative to the existing 'fabric' of drains and ditches that constitutes the
Marsh; and

- Should dewatering be employed at Joyce Green Quarry there will be a need to demonstrate how brackish/ saline ingress will be managed, given the proximity to the River Darent's tidal reach during the operational phase.
- A licence should be sought from the EA should there be a proposal to dewater the site.

Flood Risk

No objection to the proposed M14 site on flood risk grounds, the proposed mineral site falls within the High Risk Flood Zone as shown on the Agency's Flood Map:

The site falls within Flood Zone 3 (FZ3) as described in Table 1, of the Technical Guidance to the National Planning Policy Framework. Local Authorities are guided to adopt a precautionary approach to the issue of flood risk, avoiding such risk where possible and managing it elsewhere.

Table 2, paragraph 066 of the Planning Practice Guidance acknowledges that sand and gravel deposits are 'water compatible' developments. This means they must be worked where they occur, and so likely to exist within a Flood Zone. However, they must still be worked in ways that do not increase flood risk. The proposals for minerals extraction that are situated in FZ3 must be accompanied by a detailed Flood Risk Assessment (FRA), which demonstrates the activities they intend to undertake do not increase flood risk to the site or surrounding area. This must be approved by the Environment Agency.

The Joyce Green Quarry site (Dartford) has flood defences either on or adjacent to the site. The EA require detailed information about the distance of the extraction from the flood defences and how any extraction could impact the integrity of the flood defence.

Highways England

Highways England will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M25 and in particular Junction 1a. The site is located approximately 2km from the junction.

From the available information, it seems the site would undoubtedly have an impact on M25 Junction 1a, an already congested junction

Highways England are in agreement with the County Council that vastly increased HGV movements associated with the transportation of inert restoration materials would be very unlikely to be acceptable and a Transport Assessment will be required at the time of the application demonstrating the vehicle movements associated with the extension of the site. Accordingly, the construction and operational impacts of the site on the SRN needs to be considered, both individually and cumulatively in order to for us to be satisfied that the proposals will not materially affect the safety, reliability and/or operation of the SRN (the tests set out in DfT C2/13 and DCLG NPPF para 32). If the impact of the proposals is detrimental to the safe and efficient operation of the SRN mitigation would be required to ensure that the impact upon the local road infrastructure is reasonable.

Additional details of potential traffic impact have been prepared by the promoter of the site; Highways England has not provided any further comment.

Natural England

The allocation is likely to:

- Result in a partial loss of Coastal and Floodplain Grazing Marsh priority habitat

Have indirect impacts to the adjacent Coastal Saltmarsh priority habitat

Further assessment should be undertaken to assess the implications of the allocation on priority habitats/habitats of principle importance.

Dartford Borough Council

The site option is identified as 48ha of land at the west side of Dartford Marshes close to the River Darent. The land is salt marsh and is designated as a Local Wildlife Site which is noted in the assessment. However, its designation as Borough Open Space in the Dartford Development Policies Plan, 2017 (DP24) is not. The site lies in a Biodiversity Opportunity Area (DP25), where Dartford's Development Plan policies require particular focus to be given to enhancing biodiversity. Dartford's Core Strategy (CS3) requires that one of the key principles for development at the site is that the Marshes be protected and enhanced as a biodiversity asset and for low key leisure and recreation taking into account this ecological protection.

The site is located within the Green Belt. A Green Belt assessment will be required to fully assess the impact of the proposed allocation. This must assess the extent of potential visual and landscape harms including the historic importance of the landscape and ecology in this location. The site forms the remnants of the historic Thames grazing marshland of the Crayford and Dartford Marshes, spanning the Greater London Borough of Bexley and Dartford Borough. Regard should be given to the important purpose of the Green Belt at this location. It particularly serves to check the unrestricted sprawl of large built-up areas and prevents neighbouring towns merging into one another in keeping with NPPF para 80. The extent of Green Belt in the north of the Borough has previously been much reduced through urbanisation. The Crayford and Dartford Marshes provide the last limited area of separation between London and the North Kent Thames Estuary growth area and prevents their coalescence.

The contiguous nature of the marshes also provides important ecological corridors which should be considered and identified in assessment. Overall it is likely that mitigation of the harms brought about through mineral development will be challenging, impacting on the deliverability of the site.

Under current national policy, the use of land for mineral extraction is not necessarily 'inappropriate' in the Green Belt (NPPF, para 90). However, this is providing that the operation would preserve the openness of the Green Belt and that it does not conflict with its purpose. Dartford Council is strongly of the view that the location, flat landscape and extremely 'open' character (devoid of built development) of this site all indicate that its use would both severely impact on its openness and conflict with the purposes of Green Belt. In these circumstances, it is concluded that use of the land for mineral extraction would be 'inappropriate development'.

Additionally, the nature of potential development required for the mineral extraction operations should be taken into account in the assessment. It is noted in the KMWLP 2014 that 'Processing plant, commonly associated with mineral extraction, is unlikely to preserve openness, owing to its size, height and industrial appearance and therefore would be inappropriate development'.

Further technical work must include a more refined assessment as to whether 'very special circumstances' exist, in accordance with NPPF policy, so as to justify inappropriate development in the Green Belt. This should be undertaken in advance of KCC identifying a site as a preferred option for mineral extraction. In the event that 'very special circumstances' cannot be justified, as Dartford Council contends is the case with this site, the proposal cannot be considered deliverable and should be screened out of the site selection process, due to unacceptable impacts.

Dartford Borough Council - (Environmental Health Officer) raises concerns with the proposed site access via Bob Dunn Way. This access is a heavily trafficked route where nitrogen dioxide pollution levels were recorded at being 46.9 μg/m³ in 2016 (compared to an objective level of 40 μg/m³). The proposed site would result in additional (Joyce Green Quarry would have up to 160 HGV movements) HGV movements per day through an area of poor air quality.

The route along Bob Dunn Way would provide access to the A282 (M25) at junction 1a. This junction is often subjected to congestion as a result of incidents occurring at the Dartford crossing and there is concern that drivers would choose to drive through Dartford Town Centre (through Air Quality Management Areas) to avoid this congestion. There is also concern that noise from the quarrying activities would cause disturbance to residents in Temple Hill.

CPRE – expresses concerns about allocating the site. It is considered that that the Sustainability Appraisal (SA) does not give due consideration to the following and consider that their absence undermines the Summary of Stage 2 RAG Assessment and that this will need to be reassessed in the light of these concerns:

- The site forms part of a Local Wildlife Site (LSW), Biodiversity Opportunity Area and Nature Improvement Area (Dartford Development Policies Plan Figure 7: Indication of Green Space and Links identifies the site as a 'Designated nature conservation and open space area'). These designations are subject to adopted Dartford Development Policy DP25: Nature Conservation and Enhancement which resists development. Developments will be expected to preserve and, wherever possible, enhance existing habitats and ecological quality, including those of water bodies, particularly where located in Biodiversity Opportunity Areas. These designations have been omitted from the SA Scoping Report.
- The SA omits reference to and assessment of the Darent Valley Footpath which runs along the western side of the site on the flood protection banks. The path follows the whole of the western boundary of the site and extraction will, in our view, adversely impact on views from the path changing the view from looking over grazing marsh to open water
- The site was incorrectly assessed as not being in the Green Belt.
- Dartford Marshes are important for Winter bird migration. The Managing the Marshes Vision & Strategy March 2006 states that Dartford Marshes 'act as high tide refuges for birds feeding on adjacent mudflats, as breeding sites for waders, gulls and terns and as a source of food for passerine birds particularly in autumn and winter. In winter, grazed salt marshes are used as feeding grounds by large flocks of wild ducks and geese'. The SA needs to give due consideration to the impact of gravel extraction on the needs of wintering birds.
- The assessment of soil quality for the site has an Amber RAG Outcome. It is identified as Grade 3 and "The soil is likely to be impacted by activities at the site, restoration opportunities exist although it is proposed to restore the site to wetland habitat." In contrast the assessment of soil quality for Site M10 Moat Farm, again Grade 3, has an Amber-Red RAG Outcome as"... The proposed restoration is to wetland habitat and therefore the agricultural land would be lost. Opportunities for mitigation / restoration to agricultural land exist." Given that it is the intention that the proposed restoration for both sites is to wetland habitat even though restoration opportunities exist site M11 should have the same RAG Outcome, namely Amber-Red.

There are no details of buildings and processing plant that would be required to serve the site. The site lies within the Green Belt and whilst mineral extraction activity is not considered to be inappropriate development associated activities such as processing and restoration may affect 'openness' and if proposed would need to demonstrate the existence of 'very special circumstances' as set out in Green Belt policy. It would be helpful to greater understanding of what buildings would be required and where they would be located to help address this matter to enable a fuller SA.

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Table 22 of the adopted Minerals and Waste Local Plan states that the site was owned by Hanson (Joyce Green Aggregates) and that whilst it had permission it was inactive at 2015. Some aggregate had been extracted prior to extraction ceasing. The Options consultation indicates that the site is now owned by Ingrebourne Valley Ltd. This indicates that there is uncertainty over the deliverability of the site given the previous owner having ceased operations.

Kent Wildlife Trust –The trust objects to the Option site given that the potential allocation of this site would overlap with a large area of Local Wildlife Site DA04 "Dartford Marshes". This is a site of County importance for nature conservation and represents direct loss of a large portion of a locally-designated site, which cannot be mitigated for. Kent Wildlife Trust strongly objects to this (potential) allocation and it is not in conformity with current national planning guidance, as presented in the National Planning Policy Framework (NPPF).

RSPB - Allocation of the site will result in direct loss of local wildlife sites and therefore RSPB are supportive of the Kent Wildlife Trust's representations on this matter.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice from on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of Elected Representatives

KCC Member – David Butler

Advises that he "raise issues regarding the consultation and any plans to move this forward, and strongly voice my concerns in any form on these sites being used for this purpose.

Dartford North East has the highest traffic volume in the County and is in gridlock on most days due to the Dartford Crossing; for this reason alone it should not be considered a suitable site.

The Joyce Green Lane site backs on to a sports pitch currently under construction and in very close proximity to a housing development. This site off Central Road has recently had a national TNT depot built and I already receive complaints regarding noise, pollution and overall objections.

Dartford North East has had huge construction activity over the last 5 years and will continue to for the year ahead, this will add more noise and more traffic to an already overloaded network, and a further deterioration to local air quality and overall quality of life for residents in Dartford North East and the wider Dartford.

I urge you to take this into careful consideration.

Dartford Borough Council - (Leader Mr Jeremy Kite MBE)

Strongly objects to the potential allocation. There is significant local concern at the intensity of development taking place in the Borough at this time. This is leading to the residents of Dartford experiencing adverse impacts on amenity and quality of life.

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The sites identified in the Minerals Sites Plan Options consultation are part of the designated Green Belt and green space in the Dartford Local Plan. The site is closely related to large development sites which are well advanced, which provide much needed relief for the residents in an area of great change and intense development pressure. The existing Joyce Green Quarry is immediately adjacent to the large mixed-use development at The Bridge and the extension area (the M14 option site) is part of the limited remaining undeveloped land which is all that separates Greater London with the North Kent growth area and prevents the convergence of the two.

The open space needs of the local community appear not to have been taken into account, the potential loss of the open space and extraction activity in close proximity of the residential area is inherently unacceptable to the amenity protection of these residents and the wider community of the Borough. Inevitable dust and noise from the extraction would be compounded by pollution from the HGV's transporting materials from the site, in an area which already suffers from heavy congestion and Air Quality Management Area (AQMA) pollution level exceedances.

It is understood that mineral extraction has to take place to meet needs of society, however questions whether it is right that it is proposed within the densest and fastest growing part of Kent, where transport and development pressures are reaching capacity.

It is considered unacceptable that the small district of Dartford should have to be responsible for providing 25% of the required aggregates supply for the county whilst making an extensive contribution to housing delivery. It is not possible for the area to meet these competing and intensely impacting forms of development. The Mineral Sites Plan is being prepared in an uncoordinated manner with regard to the wider planning of the area given current National Planning Policy, however the Mineral Sites Plan cannot be prepared in a vacuum and the wider planning issues must be taken into account in preparing this Plan.

Representations made by members of the public

Concerns raised by local residents during the options consultation included:

- Impact on local amenity and health by way of noise, dust and vibrations
- Impact on flora and fauna
- Marshland is an important habitat
- Impact on landscape and visual amenity
- Impact on archaeology
- Cumulative impact with other major developments in the area
- Industrialisation is contrary to the regeneration of Dartford
- Encroachment of nearby industry
- Lack of restoration of other quarries in the area is blighting the locality
- Highway infrastructure inadequate and impact on road safety
- Site needs to be restored to a high standard
- Contamination of water resources
- Impact on PROWs
- Impact on flood risk
- Will deplete local water resources
- River should be utilised to transport materials
- Impact on property values

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2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

The site lies to the east of the River Darent, with the permitted Joyce Green Farm Quarry operating to the south of the site. The Bridge housing development lies to the south east, at some 300m distance from the permitted Joyce Green Quarry and approximately 450m from the promoted M14 site. The intention is for the processing area to remain on the permitted site. To the west, the closest dwellings are within Slade Green, Bexley at approximately 650m distance from the proposed operational areas and some 1500m from the processing area.

Given the separation of the site from the main residential areas of Dartford and Bexley, extraction and restoration operations at the site would not result in significant adverse impacts of noise or vibration to residential amenity. As extraction would be from marshland the sharp sand/gravel is likely to be wet which would aid dust suppression. Extraction activity could however be constrained by residential receptors to the south east and the AQMAs across the Borough. Normal quarry operation environmental controls would likely be sufficient to contain noise and dust emissions to the wider area and the need for and efficacy of any mitigation could be considered at planning application stage. There is however, concern that the increased HGV traffic on the locality will introduce unacceptable amenity impacts, namely increased traffic congestion and air quality impacts arising from the mineral activity which could create both amenity and health effects.

This potential disturbance to amenity was raised by Dartford BC's Environmental Health Officer (EHO) and the Council's advisors. The Borough Council's EHO draws attention to the impacts on air quality, particularly if the vehicles were to choose to travel through the AQMA to avoid the congestion along Bob Dunn Way. Bob Dunn Way is a heavily trafficked route where nitrogen dioxide pollution levels were recorded at being 46.9 µg/m3 in 2016 (compared to an objective level of 40 µg/m3). The route along Bob Dunn Way provides access to the A282 (M25) at junction 1a. This junction is often subjected to congestion as a result of incidents occurring at the Dartford crossing. There is concern that HGV drivers would choose to drive through Dartford Town Centre (through the AQMA) to avoid this congestion. As a result, the proposed site would result in an additional 160 daily HGV movements through an area of poor air quality. In addition, the promoted site lies in close proximity

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to the County boundary with the London Borough of Bexley lying to the west. It is noted that the entire London Borough is designated an Air Quality Management Area and that traffic leaving the site and travelling westwards into Bexley would pass through the Bexley AQMA.

Traffic congestion in the locality often leads to a considerable number of HGV vehicles idling on local roads and in the absence of overriding evidence, the impact upon air quality in this location may not be capable of being adequately addressed.

In respect of impact upon open space, the promoted site forms part of the open space requirements for strategic development that has taken place in the area. Its long-term protection from development is a significant part of the Borough's adopted local plan amenity provisions. The site lies within a Biodiversity Opportunity Area where the focus is given to enhancing biodiversity. Core planning objectives seek to protect and enhance the marshland as a biodiversity asset. Further consideration is given to the implications for biodiversity below, but it is recognised that the site also has an amenity role as open space. This is particularly important as the population and development pressures increase in this part of the county.

Whilst the intention would be to restore the site and recreate the existing ditch habitat, there would be a period of some 10 years of mineral extraction, where the appearance of the landscape would be visually changed. Views of the development would be visible from public vantage points, including the Darent Valley footpath, that runs along the western side of the site. With careful design, which would need to be tested at planning application stage, views of the development are likely to be capable of mitigation, but at the expense of openness.

In conclusion, whilst the promoted site is essentially remote from immediate local residential areas, the associated HGV traffic would result in unacceptable amenity impacts on the locality, an area where there is significant development pressure. Additional HGV traffic would add to this, despite being modest in growth terms; further loading of the local highway network is unlikely to be mitigated. There is also the consideration that the site affords to the wider community an area of relative tranquility accessible by nearby public footpaths. This type of local amenity resource is limited in the Borough and would be disrupted (though not entirely lost) for the life of the development.

The promoted site would give rise to unacceptable impact on air quality and the 'general quality of life' due to increased traffic congestion on Bob Dunn Way The site would also result in the temporary loss of the open space that is part of the last undeveloped riverside areas of the Borough.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that mineral development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

The Local Highway Authority (KCC) has considered the capacity of the local roads to accommodate further HGV movements without adverse and unacceptable impact on the local highway network (with particular regard to Bob Dunn Way (A206) and its junction 1A (interchange onto the A282 Dartford Crossing approach. The excavation and restoration activity is anticipated to

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be in the order of 116-174 two-way HGV movements per day for the mineral extraction as well as for the revised restoration proposal, which now involves the importation of restoration materials.

The work concluded that the site would result in unacceptable highway impacts in the immediate locality and in particular at junction 1a with the close proximity of the SRN (M25). The Local Highway Authority has stated:

"The potential of the site to exacerbate traffic congestion around the M25/A282 junction 1A is of concern to the County Council. This location is one of the most strategically important yet least resilient parts of the national road network. It is considered by the County Council that even modest traffic increase will have potentially sizeable impacts on traffic conditions, particularly when viewed cumulatively with the other planned development as identified by the Dartford Local Plan for the area. It is the case that the Dartford crossing has been either partially or completely closed, for an average of 300 times per year (for 30 minutes or more). This can cause between 3 to 5 hours for roads to clear following a closure. This can cause blocking back on the northbound approach to the river crossing directly affecting the operation of Junction 1a. Vehicles waiting to travel northbound on the M25/A282 typically queue beyond the end of the slip road and through the western roundabout of Junction 1a. Traffic congestion on the local road network is often a direct consequence of traffic seeking alternative routes to avoid incidents and queuing on the M25/A282 mainline."

On this basis, the Local Highway Authority raises objection to the promoted site. This conclusion has been reached with knowledge of the promotor's efforts to demonstrate that the proposals would result in an increase of just 6 HGV trips (12 movements) above current levels in the peak periods. Together with the site's main market being substantively westwards, towards Greater London, and away from junction 1A on the A206/A282 interchange.

Highway England shares the concern about the resilience of the strategic network in this location and considers that the site would have an impact on M25 Junction 1a, an already congested junction. Any proposal that vastly increased HGV movements associated with the transportation of inert restoration materials is unlikely to be acceptable. Prior to concluding that the site is capable of allocation, further detailed transport evidence would be required setting out the transport implications of the mineral development, and demonstrating that the vehicle movements associated with the extension of the site will not materially affect the safety, reliability and/or operation of the SRN. It is noted that additional details of potential traffic impact have been prepared by the promoter of the site and that Highways England has not provided any further comment.

The promotor had examined the potential use of the River Thames and River Darent for the import and export of material. Lack of commercial navigation of the lower River Darent and the existence of substantial river defences along the River Thames makes any such proposal impracticable.

In conclusion, the site is unacceptable for mineral development given the adverse impact on highway network.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets. This policy was prepared in line with the NPPF which sets out similar criteria.

The site is grazing marsh, a priority habitat and a habitat of principal importance under the Natural Environment and Rural Communities Act. The site contains two priority habitats: coastal floodplain and grazing marsh; and hedgerows. It is noted that the grassland has an affinity with other

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grassland priority habitats. The promoted site is also identified as a Local wildlife Site – Dartford Marshes, a Biodiversity Opportunity Area (BOA) and Nature Improvement Area, and forms part of Green Corridor No 12 of Bexley's 14 Designated Strategic Green Corridors River Darent corridor.

It has a number of drainage ditches bisecting the grazing (salt marsh) areas. The drainage ditches have important flora and fauna (including water vole, a Red Book conservation status species). The open grazing areas are also notable in that they 'act as high tide refuges for birds feeding on adjacent mudflats, as breeding sites for waders, gulls and terns and as a source of food for passerine birds particularly in autumn and winter. In winter, grazed salt marshes are used as feeding grounds by large flocks of wild ducks and geese'. Mineral extraction would have the following impacts on priority habitat:

- partial loss of Coastal and Floodplain Grazing Marsh priority habitat
- indirect impacts to the adjacent Coastal Saltmarsh priority habitat
- indirect impacts to the adjacent Deciduous Woodland priority habitat

All of these biodiversity assets are likely to be significantly negatively affected by the proposed operations and habitats will be lost.

Planning policies require a particular focus on enhancing biodiversity. The original intention was to restore the site to water bodies with wetland edges to provide additional biodiversity and recreational use of part of the site. In response to the detailed technical assessment work, the promotor's of the site have amended its proposal to enable restoration of the site to recover the ecological value of the land. This is proposed to be done with importation of inert materials to allow for re-creation of the grazing saltmarsh as bisected with the drainage ditch array currently present on the site. This, in principle, would be an acceptable way to mitigate losses of important habitat, though there appears to be less overall restored ditch length proposed that currently exits. Species/populations could be significantly affected during this loss and the re-creation of habitat process. Any biodiversity gain is unlikely to be a significant benefit for species affected by the temporary habitat losses and overall disturbance potential prior to eventual restoration. Moreover, the inherent complexities of a programme of ditch restoration and grassing saltmarsh using imported materials of different drainage (hydrological) characteristics, in association with maintaining the flora and fauna diversity currently present are such that deliverability of the restoration is questioned.

Landscape

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no acceptable adverse impacts on important landscapes. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that minerals development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The amended proposals to change the final restoration objective from grazing marsh and open lake are to grazing marsh with reinstatement of the pattern and form of the drainage ditches is advantageous in landscape impact terms. It would effectively recover the landscape visually in terms of its character. However, the landscape would experience a temporary degree of disruption during the extraction and restoration phases. The intention to work the site effectively as a later phase to the permitted quarry working to the south, would negate the need for additional plant and processing facilities, thereby reducing the visual impact of the development and urban features in the landscape.

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The development of the site would have a significant impact on the priority habitat inventory and local wildlife site designation. Any habitat creation through restoration and careful choice of planting and landscape design would enable the adverse effects caused by the extraction activities to be mitigated.

Whilst, in the longer term, mineral extraction would enable the land to remain open and free of built development, the landscape would be altered throughout the construction and restoration phases, thereby reducing the local value that the local plan strategy has identified.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

There are no historic buildings or structures that would be directly affected by the proposed development of the site. No impacts are likely to listed buildings. The nearest listed building is a coal marker at approximately 480m. However, the Council's Archaeological Officer considers that there is a lack of site survey evidence to establish the presence of any Palaeolithic and Holocene archaeology at the site. Desk top evidence has been submitted, but further assessment is necessary to inform whether the site is suitable for mineral development and the acceptability of mitigation.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The site is within Flood Zone 3 (1% or 1 in 100 annual probability of flooding). The Environment Agency made no adverse comments regarding flood risk, acknowledging that sand and gravel extraction represents a "water compatible" development and would not increase the overall flood risk characteristics of the site and the wider area. Further information, detailing how the proposal could impact the integrity of nearby flood defences would be required should the site be allocated.

The site is defended against flood risk, and the proposed mineral extraction operations would not compromise these works given that they are outside the area of mineral extraction and adequate standoffs would be normal to mineral operations such a location . Groundwater would require to be considered against the intended restoration proposals of using inert materials to regain the land levels and re-create the drainage ditch pattern across the site. This would have to be subject to exacting environmental controls as exercised by the Environment Agency's permitting regime under the relevant provision of the Environmental Protection Act 1990. Groundwaters would be protected from pollution by these legislative provisions.

The County Council concludes that the information requested to establish the impact on the water

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environment is a matter that could be addressed at planning application stage. In principle, there is no overriding water resource interest that renders the site unsuitable for allocation.

Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

The promoted site is low-lying, and the mineral resource is a superficial Sub-Alluvial River terrace deposit (Taplow Formation) that can be up to 4-5m in depth. The material is proposed to be progressively backfilled with inert restoration materials. The operation would not entail any significant risk to land stability. The adjacent flood defences would require a sufficient standoff to ensure that their geotechnical stability requirements are maintained, this is would be normal operational mineral development procedure.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

Footpaths run along the site boundary to the west, east and southwest of the site, including the Darent Valley Path, the London Loop and the Thames Path, promoted as recreational paths. The Darent Valley Footpath runs along the top of the flood embankment to the west of the site. Users of these paths will see the site across the large open landscape. Screening will be provided but the site will still be visible from the path on the embankment, although the proposed development will not divert the paths. Users of roads in the vicinity may have glimpsed or distant views of the site and residents in Oaks Road to the west may see the site from upper windows.

Mitigation should be provided in the form of retained and enhanced vegetation and bunds which will minimise most impacts, although not for users of the path along the raised earth banks which could potentially be significant and adverse impacts for those users. Proposed mitigation measures and their effectiveness are a matter that can be considered at planning application stage.

Footpath DB1 and bridleway DB2 (to the west and east of the site essentially being coincident with but not on the promoted site boundaries) would not be directly affected by the proposals. However, they may require a degree of maintenance (to facilitate use of the paths adjacent to mineral workings).

KCC PROW officers have made no adverse comments on the proposal, and as such the County Council concludes that the impact on PROW's does not constitute a reason for not allocating the site.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes possible. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site comprise grade 3 agricultural soil. The site is however in use as marshland and as considered above has an important open space function to support urban growth within the Dartford area. It is unlikely to be used for agricultural purposes given its biodiversity interest above.

The County Council concludes that the impact on soil quality does not constitute a reason for not allocating the site

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised that mineral working has taken place in the surrounding area of the Darent Valley in the past, with particular regard to the ongoing quarrying operation at Joyce Green Quarry, immediately to the south of the promoted site. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. In this instance, the assessment of potential cumulative impacts which could arise from development in this location relate to the impacts from HGV movements and the consequential impact on air quality. From the evidence available these would give rise to unacceptable cumulative impact.

Need for the Mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel¹². The yield from this site is estimated to be 1.5m tonnes which would make a significant contribution to supply requirements.

The British Geological Survey states that the geology of the site is as follows:

"River terrace deposits of the middle and lower Thames contain gravel clasts mainly composed of flint, vein quartz and local bedrock lithologies including chert. Modern British Geological Survey maps also show the terrace deposits as named units which are here interpreted as members of the Maidenhead Formation. The main terrace deposit members are the Black Park Gravel, Boyn Hill Gravel, Lynch Hill Gravel, Hackney Gravel, Taplow Gravel, Kempton Park Gravel, Shepperton Gravel and Staines Alluvium. Brickearth silt beds include the Enfield Silt, Roding Silt, Langley Silt, Dartford Silt, Crayford Silt and Ilford Silt."

The deposit of the site is part of the lower Thames Taplow Formation. A main terrace of flint gravel that represents a relatively thick layer of predominantly 'flint' sands and gravels that are considered as being of high quality for such applications as structural concrete manufacture.

Whilst it is recognised that there is a need to allocate the site on national planning policy grounds in respect of mineral need, the adopted KMWLP Policy CSM2 makes it clear that the requirement will be planned for ".... while resources allow". It therefore follows, that if the site is unacceptable in

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¹² See Sharp Sand Topic Paper

principle and cannot be allocated, the adopted policy recognises that demand will be met from other sources. These are principally a combination of recycled and secondary aggregates, landings of MDA (marine dredged aggregate), blended materials and imports of crushed rock through wharves and railheads. The actual proportions will be decided by the market.

Green Belt

The proposed site has been assessed against policy DM4 of the KMWLP which states that development within the Green Belt will be considered in light of its potential impacts and shall comply with national policy and the NPPF policy on Green Belt.

The site is within the Metropolitan Green Belt. Whilst mineral extraction does not inherently constitute 'inappropriate development' within the Green Belt (see NPPF Section 146), the proposal has to be considered against other mineral extraction and restoration elements such as the need for plant/processing equipment, infilling of land with waste materials (including inert materials) and screening measures (such as bunds and fencing). As these activities can have an impact on the 'openness' of the Green Belt, and/or cause 'harm' to the Green Belt (see section 144 of the NPPF).

The proposals would not involve the need to establish new plant to process the extracted materials given that the existing permitted plant site to the south of the Option site would naturally be utilised for the processing of the materials (washing, grading and stockpiling of the flint sands and gravels). Nor would there be a need for substantive site screening bund structures given that the extraction site is remote to immediate local residential receptors. Therefore, it is considered that the development of the site for mineral extraction and restoration would not have a detrimental impact on the need to preserve the openness of the Green Belt.

With regard to the restoration operations, it is clear in the NPPF that this element of the proposal is not identified amongst the list [a) to f) Section 146] of forms of development that are not inappropriate in the Green Belt. It therefore follows that any infilling operations (as proposed for restoration purposes) are 'inappropriate development'. In light of this it is necessary to consider whether 'very special circumstances' (see section 144 of the NPPF) exist.

The Green Belt considerations are complex, with the mineral extraction element being recognised as an acceptable form of development, provided 'openness' is not compromised. It could be concluded that as there is a lack of any requirements for screening bunds or plant and machinery on the land the site is acceptable against national Green Belt policy.

However, infilling the land to re-establish the ecologically valuable habitats, that would be otherwise threatened with loss, is not regarded as acceptable as 'appropriate' development by the NPPF. Very special circumstances have to be advanced that demonstrate how the need for the proposal can outweigh the 'inappropriateness' of what is being proposed and 'harm' to the Green Belt that would result. It is considered that infilling the site and the 'harm' to the Green Belt (that can be attributed to such impacts as disturbance and impact to the amenity of the area) are not outweighed by the need for the mineral. Although of recognised high quality (Taplow Formation), the need to maintain landbanks of landwon minerals of this type are to be attempted for as long as "...resources allow" (see Policy CSM 2 page 47 of the adopted Kent Minerals and Waste Local Plan 2013-30). Alternative high-quality aggregate mineral supply is available from nearby wharf importation in the Dartford and Gravesham areas.

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Therefore, the estimated shortfall (5.75 mt) in the permitted reserves landbank is not in itself sufficient to override Green Belt policy to allow allocation of the site, release of the resources it contains and allow for the '*inappropriate*' restoration and other 'harm' it would inevitably incur over the life of the development. Very special circumstances in this regard have not been demonstrated. Therefore, the allocation of this site would not be in accordance with the NPPF (see section 13 Protecting Green Belt land) and Policy DM 4 Green Belt of the Kent Minerals and Waste Local Plan 2013-30.

4.0 Conclusion - M11: Joyce Green Farm Quarry Extension, Dartford

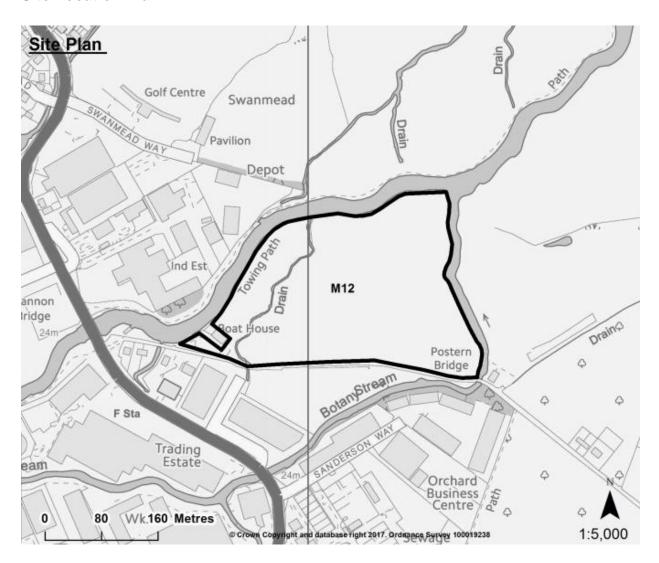
In conclusion, whilst some matters are capable of being addressed in detail at the planning application stage, the County Council considers that the M11 Joyce Green site gives rise to unacceptable impacts on a number of key matters. In particular, these relate to highway impacts on Bob Dunn Way (A206) and the M25 Junction 1a (Dartford Crossing), loss of biodiversity habitat, impact upon Local Wildlife Sites (LWS) and UK Biodiversity Action Plan (BAP) interests, the appropriateness of the restoration proposals, impacts on air quality impact and the AQMAs and conflict with Local Plan open space objectives. The proposal is also considered contrary to Green Belt policy, being inappropriate development for which no very special circumstances have been demonstrated.

The County Council is therefore unable to conclude that the site is acceptable for allocation. The site is not identified as a site in the Pre-Submission draft of the Mineral Sites Plan.

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M12: Postern Meadows, Tonbridge - Sharp Sand and Gravels

Site Location Plan



1.0 Matters addressed by Detailed Technical Assessment

Matters Identified by the Initial Site Assessment

As set out in section 3 of this report, the initial assessment of the site identified a number of matters which would require particular consideration, these were:

- Impact on landscape
- Impact on biodiversity
- Impact on the historic environment
- Impact on the water environment
- Loss of grade 3 agricultural soil
- Impact on Public Rights of Way (PROWs) and their setting
- Impact on the highway network
- Impact on health and amenity

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- Cumulative impact with other development in the area such as the industrial estate to the south
- Site is within the Green Belt

Matters Raised during the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency (EA) – Object due to the lack of information on how ecology of the River Medway and Botany stream will be impacted. As a minimum, measures must be taken during operation to ensure that the water quality is not affected in such a way to impact the Sewer. The implementation of a water quality monitoring programme may be appropriate.

The site overlies a gravel aquifer and is near to an SPZ3. The business park to the south is also underlain by a historic landfill. Appropriate risk assessments would need to be carried out to ascertain that any possible changes in water flow caused by quarrying would not cause impacts on controlled waters from the change in flow paths and changes to leaching from the fill materials. Relevant constraints would be imposed on a specific application for restrictions on depth of excavations, pollution control methods and ways of working to safeguard against aquifer disturbance or impacts on water quality.

So long as the final restoration plan recognises the need to ensure that the Botany Stream's function is retained, the proposal poses no immediate risk to Water Resources. Furthermore, the following uncertainties will need to be addressed, substantiated through a detailed programme of monitoring where necessary:

- In due course, it will be required to confirm the design of the restoration plan and in particular with reference to the landscapes interface with the adjoining river Medway. The site is underlain by Weald Clay Formation and there is some uncertainty as to how sustainable this restoration plan is independently from the River Medway so as to effectively augment levels. In principal we are against proposals that would result in further unconstrained demand being placed on the River Medway's flow, and especially during those scenarios when the regime would be stressed and incapable of supporting what would amount to an additional abstraction.
- A small part of the site is potentially underlain with Tunbridge Wells Sand Formation and as a consequence the extent of the outcrop and the relative position of the geological boundary with the Weald Clay Formation will need to be proven site investigation. Furthermore, it will need to be demonstrated that removing the alluvium will not pose a risk to the underlying Tunbridge Wells Sand Formation, which is a principal aquifer unit.

Furthermore, it should be noted that as of the 1st January 2018, in accordance with the Water Act 2003, dewatering is a regulated activity. A licence should be sought from the Environment agency should there be a requirement to dewater the site.

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Natural England – The proposed allocation is in close proximity to the High Weald Area of Outstanding Natural Beauty (AONB) and the proposal should be assessed carefully to determine whether the development would cause significant impact or harm. The AONB unit should be consulted and their views should be taken into consideration.

The site includes areas of priority habitat, the allocation is likely to:

- Result in a partial loss of Traditional Orchard priority habitat
- Have indirect impacts to Deciduous Woodland priority habitat.

Further assessment should be undertaken on the implications of the allocation on priority habitats/habitats of principle importance.

The proposal is likely to have an indirect impact to Ancient Woodland, further clarity on how these impacts will be avoided and fully mitigated should be provided as part of the site allocation process.

Tunbridge Wells Borough Council (TWBC) – Development of the site should only take place where there is no unacceptable adverse impact on health or amenity and appropriate mitigation should be implemented to minimise the impact. It should be the baseline that all mitigation which is reasonably practical should be implemented to protect residents.

In terms of both the existing situation, and potential growth, TWBC wishes to ensure that the further technical assessments are robust, thorough and have particular regard to the following, both in terms of the impact of individual sites and in terms of cumulative impact:

- Transport links, including highway safety and the operation of the highway network.
- Residential amenity, including in terms of impact via noise, dust, vehicle movements, air quality, vibration, etc.;
- Landscape impacts, including the setting of the Area of Outstanding Natural Beauty;
- Heritage: there are areas of potential archaeological importance within the vicinity of the allocations, as well as a number of Listed Buildings (some of which form part of historic farmsteads), the settings to which are important;
- Impact on the high-pressure gas pipeline;
- Ecology, including Local Wildlife Sites;
- Trees, including areas of Ancient Woodland;
- Flooding, both in terms of surface water and groundwater;
- Pollution, including in terms of the aquifer protection zone;
- Impact on the Green Belt, particularly having regard to the potential growth through the new TWBC Local Plan.

Southern Water – There is existing sewerage infrastructure crossing the site. This is not considered to be a fundamental constraint provided that appropriate provisions are made in the wording of any policy. The infrastructure must be protected, however diversion may be possible at the operator's expense, provided a feasible alternative route is available.

British Horse Society – The proposed location of this quarrying site borders Postern Lane, which is currently a public footpath and there is historical evidence that it was once a road connecting the Shipbourne Road (B2260) with Tudely Rd (B2017). This road should be preserved and available for all non-motorised users (NMUs). Whilst it is unlikely to be used by equestrians, if it could be upgraded to bridleway status, it would provide a useful link for cyclists.

Further to these requests in mitigation for the impact on local equestrians, after quarrying has finished reinstatement should make good use of the opportunity to provide new rights of way/road side margins and/or enhance the existing routes to provide access to all NMUs.

CPRE – Part of the northern edge and all of the eastern edge of the site lie within an area subject to adopted Tonbridge and Malling Managing Development and the Environment Development Plan Document Policy NE1 Local Sites of Wildlife, Geological and Geomorphological Interest.

There are no details of any buildings and processing plant associated with the operation of the site. The site is within the Green Belt and whilst mineral extraction is not considered to be inappropriate development, associated activities such as processing and restoration may affect the 'openness' and would need to demonstrate that 'very special circumstances' exist.

Kent Wildlife Trust – The site overlaps with Local Wildlife Site TM20 "East Tonbridge Copses and Dykes River Medway". This is a site of County importance for nature conservation. Kent Wildlife Trust object to the allocation until it can be shown that there will be no negative impact upon the designated site.

RSPB – The site will result in the direct loss of local wildlife sites and therefore share the Kent Wildlife Trust's objection to the allocation of the site.

Forestry Commission - Site assessment has identified:

- Ancient Woodland within 300m of the site
- Deciduous woodland within 500m of the site

As such, advice must be sought from the Government's Policy Statement on Forestry and Woodlands (2013), the NPPF and the NPPG.

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of local residents

Concerns raised by local residents during the options consultation included:

- Impact on local amenity by way of noise, dust and vibrations
- Impact on Ancient Woodland
- Impact on flora and fauna
- Impact on landscape and visual amenity
- Impact on public health
- Water supply pipeline crosses the site
- Impact on heritage assets listed buildings and archaeology
- Extensive quarrying in the area historically
- Encroachment of nearby industry

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- Lack of restoration of other quarries in the area is blighting the locality
- Impact on agricultural productivity, including the loss of grade 3 agricultural soil
- Located within the Green Belt
- Impact on High Weald AONB
- Highway infrastructure inadequate surrounding roads are already damaged
- Impact on road safety
- Mineral is not of a good quality and has limited use in industry
- Lack of faith in operators nearby; sites have been abandoned or not restored properly. Lack of restoration causes safety concerns.
- Contamination of water resources
- Impact on PROWs such as the Medway Valley Walk
- Impact on flood risk
- Will deplete local water resources

2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

There are a number of residential properties within 50m of the site, the closest are within 10m. These sit along Postern Lane to the south-east and south-west corners of the site. There is a risk of impacts due to vehicle emissions, but the potential for impacts due to dust is greater due to the proximity of properties to the site boundary. However, it is considered that mitigation may be possible. Tonbridge High Street would need to be avoided by vehicles accessing the site as it is an Air Quality Management Area (AQMA).

Residential receptors which could be affected by noise are located to the south of the site. The level of mitigation which would be required for this may have secondary implications with regards to landscape and visual amenity (such as bunding) or impact upon the openness of the site which would be inappropriate within the Green Belt.

In light of the proximity of residential properties to the site and lack of information concerning mitigation measures it is not possible to conclude with certainty that it would be possible to reduce

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impacts to acceptable levels.

Consideration of impacts on visual amenity is set out below.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy protection is provided for within the NPPF.

Access to the site would cross Postern Lane, before being sought through "Postern Industrial Estate" and meeting the A26. The site is on the outskirts of Tonbridge town, so traffic levels are already fairly high in the area.

The junction with Vale Road is a simple priority junction and scope for improvements is limited due to the river bridge immediately to the north of the site access. Vale Road and the adjoining highway network is already congested at peak times and therefore any significant intensification would need to be avoided.

There is concern over the capacity of the local highway network, and the suitability of HGVs crossing Postern Lane on a regular basis, as it constitutes a country road which is unsuitable for quarry traffic. Any alternative access would require travelling further along Postern Road, which would not be appropriate.

No information has been submitted to assess the impact of the site on the highway network, or demonstrate the suitability of such an access and so it is not possible to conclude that, in principle, the site would be acceptable with regard to highways impacts.

Landscape and Visual Amenity

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no acceptable adverse impacts on important landscapes, including the Kent Downs AONB, and sets out the circumstances where impacts upon them would be acceptable. Policy DM2 notes that proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the natural beauty of the AONB. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that minerals development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The site is approximately 1km away from the High Weald AONB. Given the low lying nature of the site and the abundant vegetation in the surrounding area, it is not considered that the site will have any impact on the setting of the AONB.

Assessment of landscape impacts concludes that these would be limited due to the fairly well enclosed nature of site which is due to vegetation. However, the properties on Postern Lane, and the PROWs, have clear views onto the site therefore significant adverse visual effects may result. Additionally, localised but significant adverse impacts upon the landscape may arise from the increased industrialisation within the Medway Valley at this edge of Tonbridge. Considerable

attention would need to be given to appropriate and effective mitigation measures.

Additional screen planting could provide suitable mitigation depending on the details to be submitted with any planning application. There could be a minor loss of existing trees and vegetation adjacent to an existing open drain transecting the site. Additional native planting would likely enhance the existing River Medway habitat whilst also providing additional screening during proposed extraction activities and address views across the site from the Medway Valley walk.

The site is to be restored to a landscaped lake but there are no other details. Whilst open water is acceptable, the creation of wetland, wetland scrub and marginal habitats would be favourable to increase the opportunity for further biodiversity. This would be enhanced by differing scrub and woodland mixes linking to the existing boundary habitats.

Overall the County Council considers that subject to certain matters being satisfactorily addressed at the planning application stage, the site is acceptable in principle on landscape grounds. There is less certainty that site could be made acceptable in terms of impacts on visual amenity as significant mitigation would be required.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

The site is adjacent to East Tonbridge copses and dykes and River Medway Local Wildlife Site (LWS), and the site is surrounded by mature trees and hedgerows, with the River Medway and Botany Stream running along the northern and eastern boundaries.

An area of Ancient Woodland exists within 250m to the east of the site.

It is considered that the proposal must avoid any impact on the LWS designation, and that there will be a need for ecological surveys to be carried out as part of any planning application and the restoration scheme must demonstrate that the restored site would provide ecological enhancements and enhance the habitat adjacent to the LWS.

Due to a lack of information concerning the extent of the activity at the site it is not certain that impacts on the LWS and the Ancient Woodland could be mitigated, therefore it is not possible to conclude that the site is acceptable in terms of impact on biodiversity at this stage.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

The closest designated heritage asset is the grade II listed building; Postern Heath Farmhouse, which is some 200m away from the site. The proposed access route will not pass this building and while there may be some indirect impacts on its setting it is considered that these could most likely be dealt with through appropriate mitigation.

There are no known archaeological remains within the site or in close proximity but it is considered

that deposits within the site do have potential for early prehistoric remains. Cultural Heritage would need to be addressed through a multi-phased programme both desk-based and field work, with mitigation fully informed and appropriate to the significance of the heritage assets affected. This would need to include palaeo-environmental and geoarchaeological assessment as well as regular broad ranged heritage assessment.-It is considered that potential impacts on features of archaeological interest could be addressed by appropriate monitoring and mitigation at the planning application stage.

It is considered that the potential impact of the site on the historic environment is not a matter that would preclude the site from allocation.

Need for the mineral

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

The deposit in this location constitutes river terrace sand and gravels.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel¹³. The yield from this site is estimated to be 230,000 tonnes which would make a modest contribution to supply requirements.

British Geological Survey data indicates that terrace sands and gravel is an economic mineral. The actual economic viability of any one particular deposit largely depends on the local economy and specification for quarried materials supply. While the material may not currently have significant market demand, workings have occurred in the past in the locality and thus the economic viability of the deposit may improve, particularly as other land-won resources are increasingly depleted.

Green Belt

The proposed site has been assessed against policy DM4 of the KMWLP which states that development within the Green Belt will be considered in light of its potential impacts and shall comply with national policy and the NPPF policy on Green Belt.

The site is within the Metropolitan Green Belt. Mineral extraction is not considered on its own to be inappropriate development, however structures such as bunds, plant and machinery which may impact of the openness of the Green Belt can be considered to be inappropriate development.

As noted above, mitigation of visual impacts on nearby receptors may require development, such as bunding, that is likely to be considered inappropriate within Green Belt as would processing equipment and on site offices.

Therefore, a case of Very Special Circumstances would need to be demonstrated whereby other considerations were shown to outweigh the harm to the Green Belt and any other harm. There is no certainty that such a case could be demonstrated.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies

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¹³ See Sharp Sand and Gravels Topic Paper 2018

within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The site is within Flood Zone 3 which has the highest probability of flooding. It also overlies an aquifer and it near to a SPZ.

KCC's Flood Risk Assessment concluded the following:

- The main potential source of flooding is from the River Medway and its tributaries.
- There is potential for a high water table at the site, resulting in a potential requirement for dewatering.
- As the development involves extraction of minerals as opposed to raising the ground level, it will not result in a loss of water storage for the flood plain. The resulting waterbodies could provide water storage and reduce flood risk off site.
- Further hydraulic modelling would be needed to establish the impact of the site on the watercourses, including the watercourse running through the site.

The underlying Tunbridge Wells Sand Formation is a principal aquifer unit and therefore any planning application would need to demonstrate that removal of the alluvium will not pose a risk to the aquifer.

In principle the EA are satisfied that the risk of impacts to water resources posed by this site is not a concern – any planning application would require appropriate investigation and modelling to be carried out to confirm the position.

It is considered that the potential impact of the site on the water environment is not a matter that would preclude the site from allocation.

Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

The County Council's land stability report¹⁴ concludes that the proposed operations will have a minimal risk in terms of land stability. There are very few sensitive receptors adjacent to the site with the exception of the banks of the River Medway. This can be mitigated by allowing appropriate standoff distance to ensure that the banks are not breached.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes possible. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site contains Grade 3b Postern Meadows comprises grade 3b agricultural soil which is considered to be moderate soil which has limitations on the range of crops it can yield. Furthermore, due to the limited size of the site it is not considered that development in this location would lead to a significant loss of agricultural soils.

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¹⁴ KCC (amey) Land Stability Assessment Technical Report August 2018

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

PROW MU32 (Medway Valley Walk) runs to the north of the site on the other side of the River Medway. The views from this PROW will be impacted as it currently looks out onto the open pasture.

The south of the site is bounded by PROW MU33. The site access will intersect this PROW and it is not clear whether diversion will be possible.

Based on the information available, it is not possible to conclude whether the site will be acceptable in terms of impacts on PROWs at this stage.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. The assessment of potential impacts which could arise from mineral development in this location is not sufficiently conclusive to establish whether unacceptable cumulative impacts would arise. In any event cumulative impacts would require further consideration if a proposal were to come forward.

4.0 Conclusion - M12: Postern Meadows, Tonbridge

It has not been possible to conclude that impacts on the following matters due to minerals development in this location could be mitigated to levels that would be acceptable:

- Biodiversity
- Highways and transportation
- Landscape
- Amenity
- PROWs

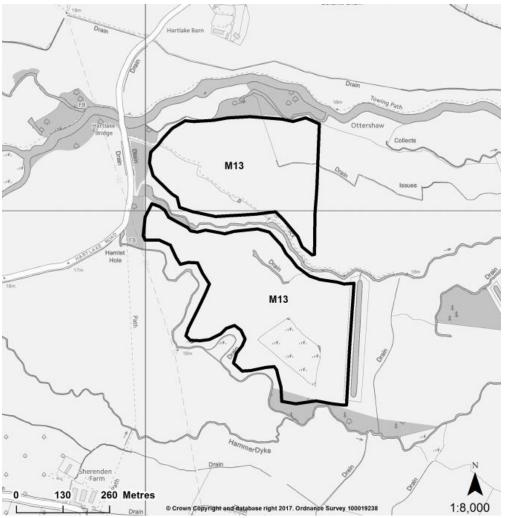
There is also insufficient information to conclude that mineral development in this location would not be in conflict with policy on Green Belt.

In the absence of information to demonstrate that the site will not adversely impact the above areas, it is not possible to conclude that the Postern Meadows site (M12) constitutes acceptable development in principle. Therefore, the site should not be allocated.

The M12 site is not identified as a site in the Pre-Submission draft of the Mineral Sites Plan.

M13: Stonecastle Farm Quarry Extensions, Hadlow/Whested - Sharp Sand and Gravels

Site Location Plan



1.0 Matters addressed by Detailed Technical Assessment

Matters Identified by the Initial Site Assessment

As set out in section 3 of this report, the initial assessment of the site identified a number of matters which would require particular consideration, these were:

- Impact on landscape
- Impact on biodiversity
- Impact on the historic environment
- Impact on the water environment
- Loss of grade 3 agricultural soil
- Impact on PROWs and their setting
- Impact on services and utilities
- Impact on health and amenity

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- Cumulative impact with other development in the area such as the industrial estate to the south
- Site is within the Green Belt

Matters Raised during the Options Consultation

The matters raised during the public consultation on this site are summarised below.

Views of key organisations

A summary of the responses from key organisations, including statutory consultees, is set out below which sets out the nature and extent of the concerns of such consultees especially with regard to the matters listed above.

Environment Agency (EA) – No objection to the allocation in principle.

In terms of groundwater, the site is an important setting for local water supply and further major extensions to the guarry may impact water supply options further investigation is therefore required.

The site poses a moderate water resource risk. It is anticipated that appropriate mitigation measures, substantiated through a detailed programme of monitoring, will be necessary.

The design of the restoration plan and in particular with reference to the proposed lakes and their interface with the adjoining River Medway, the Hammer Dyke and associated drains would need agreement with the EA. The site is underlain by Weald Clay Formation and there is some uncertainty as to how sustainable the restoration plan is, independent of a feed from any one of the watercourses that will bound the lakes, once the mineral has been extracted. The restoration plan will need to include evidence demonstrating how the integrity of those watercourses sited on the curtilage of the workings will be retained.

Two Abstraction Licences are sited within the vicinity of the proposed workings at Stonecastle Farm. Both Licence 9/40/03/0215/SR [Sherenden Farm, Tudley] and Licence 9/40/03/0474/G [South East Water, Hartlake] will need to be accounted for in terms of the operation phase and the subsequent restoration. The assessment will be required to determine whether the Stonecastle Farm option poses a risk of derogation to the licensees' regulated activities. South East Water will need to be consulted with, the proposal raising potential questions as to the longer-term viability of the superficial aquifer at Hartlake, from where the Company abstracts.

A licence should be sought from the Environment Agency should there be a requirement to dewater the site.

The site is within Flood Zone 3 and a precautionary approach should be applied, avoiding flood risk wherever possible. Any application must be accompanied by a detailed flood risk assessment.

No comments on biodiversity, however there are records of Nuttall's pondweed and Crassula in the area. Considered that the developer should accept responsibility for and contribute to the management of the species as part of the works.

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South East Water – Working the site wet [as proposed] removes the requirement for dewatering and reduces the risk of impinging on groundwater levels at the abstraction, which previously gave concern over impacts on local water supply.

The hydrogeological appraisal of the site sets out the potential impacts on the aquifer and the abstraction along with proposed mitigation. This should be formalised through the planning process in consultation with SE Water.

Some concerns over the potential for increased turbidity and the increased vulnerability due to removal of the confining overburden. The site includes areas designated at Drinking Water Safeguard Zones for both surface water and groundwater, and there are existing problems with diffuse pollution within the catchment. The risks of pollutants entering the restored open lakes should therefore be considered.

A requirement for a Hydrometric Monitoring Strategy is supported. Monitoring at the existing locations should continue to allow an extension of the baseline data and be appropriate for the potential risks identified. The results of the monitoring should be regularly reviewed, and the conceptual model of the site updated as required. The future hydrometric monitoring requirements at the site should be agreed between the operator, the Environment Agency, Kent County Council and South East Water before any works on the site begin.

Any applicant carrying out activities within a groundwater source protection zone should follow and comply with the Environment Agency's approach to the management and protection of groundwater as outlined within their Groundwater Protection Position Statements and take all measures and precautions necessary to avoid deterioration in the quality of groundwater below the site.

Natural England – The proposed allocation is in close proximity to the High Weald AONB and the proposal should be assessed carefully to determine whether the development would cause significant impact or harm. Views of AONB unit should be taken into consideration.

The site includes areas of priority habitat, and the development will result in:

- Loss of Deciduous Woodland Priority Habitat
- An indirect impact on adjacent areas of Deciduous Woodland Priority Habitat.

Further assessment should be undertaken on the implications of the allocation on priority habitats/habitats of principle importance.

Tonbridge and Malling Borough Council

Cumulative impacts of several sites operating at the same time could be severe if not properly planned for and managed. Consideration and mitigation of cumulative impacts in terms of increased traffic movements is, particularly when considering the quality and size of local roads. Of particular concern is the cumulative impacts of noise, dust and vibration from the minerals operations and transportation on the amenity of nearby residents. In addition, cumulative impacts on flood risk, including surface water flooding should be assessed.

The sites lie within close proximity of the High Weald AONB and there are several long-range vistas that can be enjoyed from the vicinity of Stonecastle Farm. It is important that these are respected during the operation and restoration of the sites and that unacceptable adverse impacts are prevented.

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There are several Listed Buildings within close proximity of Stonecastle Farm. Every effort should be made to protect these important heritage assets and their settings and unacceptable adverse impacts should be prevented.

Tunbridge Wells Borough Council – Development of the site should only take place where there is no unacceptable adverse impact on health or amenity and appropriate mitigation which is reasonably practical should be implemented to protect residents. Further technical assessments should be robust, thorough and have particular regard to the following, both in terms of the impact of individual sites and in terms of cumulative impact:

- Transport links, including highway safety, operation of the highway network and access to Stonecastle Farm;
- Residential amenity, including in terms of impact via noise, dust, vehicle movements, air quality, vibration, etc;
- Landscape impacts, including the setting of the AONB;
- Heritage: there are areas of potential archaeological importance within the vicinity of the allocations, as well as a number of Listed Buildings (some of which form part of historic farmsteads), the settings to which are important:
- Impact on the high-pressure gas pipeline;
- Ecology, including Local Wildlife Sites;
- Trees, including areas of ancient woodland;
- Flooding, both in terms of surface water and groundwater;
- Pollution, including in terms of the aquifer protection zone;
- Impact on the Green Belt, particularly having regard to the potential growth through the new TWBC Local Plan.

Hadlow Parish Council – Object to the allocation on a number of grounds:

- Concerns over previous arrangement regarding restoration and aftercare at the existing Stonecastle Farm Quarry site.
- Local roads are inadequate for HGVs and the proposal will cause road congestion.
- The impact on flood risk in the wider Medway River Basin needs to be addressed holistically; the proposal could have an adverse impact on flood risk in areas downstream.
- Proposal could have adverse impact on hydrogeology with long term implications.
- Adverse impact on biodiversity; impact on LWSs, Ancient Woodland and breeding populations of birds.
- Cumulative impact with other sites in the area will have an adverse impact on the local landscape character.
- PROW's run through the site which would be negatively impacted.
- Impact on the High Weald AONB.
- Loss of agricultural land and adverse impact on rural economy.

CPRE – Concerned with the following matters:

- Visual impact from the High Weald AONB.
- Severe impact on local roads by HGVs.
- Impacts on PROW, including the Medway Valley Walk and the Wealdway which run on the north side of the River Medway.
- No details of any buildings and processing plant which may impact the openness of the Green Belt and so be in conflict with national Green Belt policy.
- Negative cumulative impact taking account of the Moat Farm site

Consideration should be given to restoring the site to agriculture.

Kent Wildlife Trust – Object to the allocation until it can be demonstrated that there will be no negative impact on the adjacent Local Wildlife Site TM20. Proposed Phase 3 is also adjacent to the Ancient Woodland and therefore the proposal will need to demonstrate that there will be no negative impact on this designation.

RSPB – The site will result in the direct loss of local wildlife sites and therefore share the Kent Wildlife Trust's objection to the allocation of the site.

Forestry Commission – Site assessment has identified:

- BAP Habitat Deciduous Woodland within the site
- Ancient Woodland adjacent to the site

KCC Advisors

In undertaking this detailed assessment, advice has been sought from a range of technical specialists who advise the County Council on planning matters. This includes advice on biodiversity, Public Rights of Way, noise, air quality, landscape, heritage, water resources, stability and highway and transportation interests. The views received have informed the assessment and the discussion section below. Several related standalone specialist reports have been prepared and have been published as background documents. The work has also been informed by the Project's Sustainability Appraisal work.

Views of local residents

Concerns raised by local residents during the options consultation included:

- Impact on local amenity by way of noise, dust and vibrations
- Impact on flora and fauna including Ancient Woodland
- Impact on landscape, including High Weald AONB, and visual amenity
- Impact on public health
- Impact on heritage assets listed buildings and archaeology
- Extensive quarrying in the area historically
- Encroachment of nearby industry
- Lack of restoration of other quarries in the area is blighting the locality
- Impact on agricultural productivity, including the loss of grade 3 agricultural soil
- Located within the Green Belt
- Highway infrastructure inadequate surrounding roads are already damaged
- Impact on road safety
- Mineral is not of a good quality and has limited use in industry
- Lack of faith in operators nearby; sites have been abandoned or not restored properly. Lack
 of restoration causes safety concerns.
- Contamination and depletion of local water resources
- Impact on PROWs such as the Medway Valley Walk
- Impact on flood risk
- Will reveal overhead power cables
- Site previously refused planning permission in 2000

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2.0 Sustainability Appraisal

In accordance with statutory requirements a sustainability appraisal (SA) has been completed which considers how well the site performs against certain sustainability objectives. The detailed results of the SA are set out in a separate document.

3.0 Discussion

This section addresses matters raised above as well as those identified during the initial site assessment which are key to assessing the suitability of the site for allocation in the Kent Minerals Sites Plan.

Amenity

The promoted site has been assessed against policy DM11 of the KMWLP which requires that mineral development should not generate unacceptable impacts from noise, dust, vibration, odour, emissions, illumination, visual intrusion, traffic or exposure to health risks and associated damage to the qualities of life and wellbeing to communities and the environment. Similar policy protection is provided within the NPPF.

The site is remote from any significant areas of residential development. The closest sensitive receptors are the residential properties to the north of the site off Hartlake Road, these are 250m away.

Background air quality is considered to be good. Sources of air pollution are likely to be background dusts from agriculture and some transboundary air pollution. It is considered that mitigation is fully achievable against possible adverse impacts. The wet working of the site will suppress dust emissions and so reduce risk of air quality impacts.

Ambient noise climate is likely to be quite low due to the distance of the site from any major roads or built up areas. It is considered that mitigation may be required to protect the properties to the north. Mitigation in the form of routing and hours of operation may be necessary to reduce the level of traffic related noise impacts on surrounding villages including Golden Green. Overall it is considered that sensitive receptors are such a distance away that any negative amenity impacts can be satisfactorily mitigated.

It is considered that mitigation of impacts on the local amenity to acceptable levels is likely to be achievable and so this matter should not preclude the site from allocation.

Highways and Transportation

The proposed site has been assessed against policy DM13 of the KMWLP which requires that minerals development satisfy that the access arrangements are not detrimental to road safety, that the highway network is able to accommodate the traffic flows and will not give rise to unacceptable impact on the environment or local community and that emission control and reduction measures are proposed, particularly within an AQMA. Similar policy support is provided for within the NPPF.

The promotor submitted a Transport Assessment which stated that the site would be served by the existing access to Stonecastle Farm Quarry on Whetsted Road, and all traffic would turn left out of the site in accordance with the existing permission. The transport assessment states that the

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quantum of HGV traffic is not proposed to change, and neither is the level of employment on site. The report concluded that there would be no reason to exclude the site on highway safety grounds, and that the existing access remains suitable subject to a few minor repairs.

Planning permission for mineral extraction at Stonecastle Farm was most recently granted in 2017 after it was found that impacts on the highway were acceptable. Mitigation measures are already employed such as the prohibition of vehicles turning right on exiting the site to prevent them driving through surrounding villages.

The Council's Highways Officer considered that provided proposed extensions do not result in an increase of number of vehicle trips per day (meaning that the site would not be worked concurrently to the existing site) then the proposal would likely be acceptable. It is anticipated that the same conditions and restrictions would need to be imposed on the allocation as for the existing site. If this is the case, then the proposed allocation would not trigger the need for further mitigation.

In light of the above it is considered that potential impacts resulting from vehicles accessing the site are not a matters that would preclude the site from allocation.

Landscape and Visual Amenity

The proposed site has been assessed against policy DM2 of the KMWLP which aims to ensure that there are no acceptable adverse impacts on important landscapes, including the High Weald AONB, and sets out the circumstances where impacts upon them would be acceptable. Policy DM2 notes that proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the natural beauty of the AONB. This policy was prepared in line with the NPPF which sets out similar criteria. Impacts on visual amenity are assessed against policy DM11 that seeks to ensure that mineral development is unlikely to generate unacceptable adverse impacts from visual intrusion.

The site is approximately 1km away from the High Weald AONB. It is considered that the site is highly unlikely to have any impact on the setting of the AONB given the low lying nature of the site and surrounding vegetation.

Assessment of landscape impacts concludes that the site is very well enclosed by vegetation cover and as such is not clearly visible from publicly accessible locations or from properties. The landscape of the site and surrounding area is of a scale and character that has potential to accommodate quarrying activity with only limited and localised adverse effects.

Detailed restoration proposals would need to demonstrate that the potential loss of BAP habitat deciduous woodland is offset by replacement woodland provision.

The adjacent Ancient Woodland should be retained and not detrimentally affected by the proposed works and should be enhanced by additional woodland planting where possible along the western and southern boundaries of the proposed quarry extension site.

Overall the County Council considers that subject to certain matters being satisfactorily addressed at the planning application stage, the site is acceptable in principle on landscape grounds.

Biodiversity

The proposed site has been assessed against policy DM3 of the KMWLP which requires that proposals do not result in unacceptable adverse impacts on Kent's important biodiversity assets and

SSSIs. This policy was prepared in line with the NPPF which sets out similar criteria.

An ecological appraisal provided by the promoter provides a good understanding of the likely species to be present within the site including protected/notable species. This appraisal concludes that there is suitable habitat within or adjacent to the site for a number of species.-

Information would need to be submitted as part of any planning application to demonstrate that appropriate mitigation of any habitat loss can be implemented. The applicant would need to demonstrate that they have sufficient land to create and establish replacement habitat. The restored areas of the wider site could be used as mitigation areas however this will need to be fully understood before work can commence.

Any loss of Deciduous Woodland Priority Habitat to the new lake area (post extraction) will be compensated with new woodland planting such that the amount of available woodland habitat does not change.

There is an area of Ancient Woodland to the south of the site, this is outside of the site boundary so will be excluded from the area of working. A suitable buffer will need to be implemented and maintained so that the designation is not impacted indirectly.

Local Wildlife Site TM20 sits to the north, there is potential that this could be indirectly impacted by the activities on taking place on site and as such suitable buffers and other mitigation will need to be employed.

In light of the above it is concluded that the site can be allocated as acceptable in principle on biodiversity grounds.

Historic Environment

The proposed site has been assessed against policy DM5 of the KMWLP which requires that there should be no unacceptable adverse impact on Kent's historic environment taking account of mitigation and compensation and heritage assets be conserved in a manner appropriate to their significance. This policy was prepared in line with the NPPF which sets out similar criteria.

The closest heritage assets are two listed buildings to the north of the site, separated by the River Medway and associated vegetation. The proposed access route will not pass them. There may be some indirect impacts on the setting of these buildings however these could be dealt with through appropriate mitigation. The nearest Conservation Area is Little Mill, East Peckham, which is approximately 2km away.

There are no known archaeological remains within the site or in close proximity. Deposits within this site do have potential for early prehistoric remains. Earlier extraction to the east has revealed remains of timber structures and a possible Saxon mill, demonstrating the potential for evidence of later prehistoric and later use and management of the water channels. A number of WWII defensive sites are located along the Medway to the north and features associated with these may fall within the proposed site.

Cultural Heritage would need to be addressed through a multi-phased programme both desk-based and field work, with mitigation fully informed and appropriate to the significance of the heritage assets affected. This would need to include palaeo-environmental and geoarchaeological

assessment as well as regular broad ranged heritage assessment.

Prior to permission for extension of the areas of extraction, the impact of the proposals upon the historic landscape and surviving features and Listed Buildings should be fully assessed and mitigation measures undertaken to avoid impacts including on their setting. The historic landscape should be taken into account during works and in later site landscaping and restoration programme.

Historic England has been consulted on the proposal to allocate this site for mineral working and it has not raised any specific concerns.

It is considered that potential for archaeology could be dealt with through appropriate monitoring and mitigation at the planning application stage and it is concluded that the potential impact of the site on the historic environment is not something which should preclude the site from allocation.

Need for the Material

The proposed site has been assessed against policy CSM2 that sets out the requirements for the supply of sharp sand and gravel. This policy was prepared in line with NPPF.

The deposit in this location constitutes river terrace sand and gravels.

Calculations regarding supply and demand based on 2017 data, taken together with an 18-year landbank, suggest the shortfall is now in the order of 5.75mt for sharp sand and gravel¹⁵. The yield from this site is estimated to be 1 million tonnes which would make a significant contribution to supply requirements.

British Geological Survey data indicates that terrace sands and gravel is an economic mineral. The actual economic viability of any one particular deposit largely depends on the local economy and specification for quarried materials supply. While the material may not currently have significant market demand, workings have occurred in the past in the locality and thus the economic viability of the deposit may improve, particularly as other land-won resources are increasingly depleted. In this instance, it is noted that the site has been promoted by Tarmac Trading Limited, an international aggregate company as an extension to existing quarrying activity at Stonecastle Farm.

Green Belt

The proposed site has been assessed against policy DM4 of the KMWLP which states that development within the Green Belt will be considered in light of its potential impacts and shall comply with national policy and the NPPF policy on Green Belt.

The site is within the Metropolitan Green Belt. Whilst mineral development does not inherently constitute inappropriate development within the Green Belt, elements such as plant/processing equipment, infilling of waste and screening measures (such as bunds and fencing) can impact the openness of the Green Belt.

The arrangement with regards to plant and machinery are that those in the existing Stonecastle Farm Quarry site will be utilised. No clear requirement for screening bunds has been identified. Restoration is proposed to open water.

Therefore, in this instance, impact on the openness of the Green Belt is considered to be negligible. KCC's Landscape Assessment considered the impact of the site against the principle of openness

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¹⁵ See Sharp Sand and Gravels Topic Paper 2018

and concluded that due to lack of clear view from receptors, there is little scope for visual impacts and impacts on openness to occur.

As such, it is concluded in principle that, as the mineral extraction is not inappropriate development and such development in this location would preserve openness and not conflict with the purposes of including land within the Green Belt, allocation of this site would not conflict with policy on Green Belt.

Water Environment

The proposed site has been assessed against policy DM10 of the KMWLP which requires that development should result in no deterioration and improved ecological status of all waterbodies within the site and/or hydrologically connected to the site. This policy was prepared in line with the NPPF.

The majority of the site is within Flood Zone 3 which has the highest probability of flooding. KCC's Flood Risk Assessment concluded the following:

- The main potential source of flooding to the site is fluvial flooding.
- There is potential for a high water table at the site, resulting in a potential requirement for dewatering.
- As the development involves an extraction of minerals as opposed to raising the ground level, it will not result in a loss of water storage for the flood plain. The resulting waterbodies could provide water storage and reduce flood risk off site.
- A 16 metre buffer should be provided around nearby watercourses.
- Further hydraulic modelling would be needed to establish the impact of the site on the watercourses, including the watercourse running through the site.

In terms of impact on groundwater recourses; the site extends into Source Protection Zones 1, 2 and 3. When planning permission was sought for Stonecastle Farm Quarry (approximately 20 years ago) the two phases being promoted now were refused due to a lack of information on the impacts they would have on local water supply; the water company could not recommend that these two phases be granted planning permission.

The promoter has presented the water company (South East Water) with further information on the impacts to hydrology and hydrogeology. This included a commitment to "wet working" the site to remove the need for dewatering. South East Water have accepted that this reduces the risk of impinging on groundwater levels and are supportive of this change. They concluded that further monitoring would need to be carried out, and a Hydrometric Monitoring Strategy would need to form part of a development management requirement for the site.

Further engagement will be undertaken with South East Water and the Environment Agency in the event of a planning application to be submitted, and policy provision would ensure that appropriate monitoring and mitigation take place so that the site does not have an adverse impact on the water environment.

Overall it is considered that the potential impact of the site on the water environment is not a matter that would preclude the site from allocation.

Land Stability

The proposed site has been assessed against policy DM18 of the KMWLP which expects that planning permission for development will not be granted unless it is demonstrated that development will not result in land instability. This policy was prepared in line with the NPPF.

The County Council's land stability report¹⁶ concludes that the proposed operations will have a minimal risk in terms of land stability. There are very few sensitive receptors adjacent to the site and any impact can be mitigated. Land stability is not therefore a matter that would preclude the site from allocation.

Soil Quality

The proposed site has been assessed against policy DM1 of the KMWLP which requires that proposals demonstrate that there is no unacceptable adverse impact on the use of other land for other purposes possible. This policy was prepared in line with the NPPF.

Natural England's Agricultural Land Classification Map states that the site comprises grade 3b agricultural soil which is considered to be moderate soil which has limitations on the range of crops it can yield. Furthermore, due to the limited size of the site it is not considered that development in this location would lead to a significant loss of agricultural soils.

PROW

The proposed site has been assessed against policy DM14 of the KMWLP which requires that where proposals impact a PROW, they will only be permitted if; satisfactory prior provisions for diversion of the PROW can be made which are convenient and safe for the PROWs users, an acceptable alternative route can be provided during operations and restoration, and opportunities to improve countryside access are taken wherever possible. This policy was prepared in line with the NPPF which sets out similar criteria.

There are no PROWs which cross the site. PROW MT160 runs to the north of the site, separated by the River Medway and PROW TT168 runs to the south west of the site off of Hartlake Road.

Whilst these PROWs will not be directly affected or require any diversion, their setting will be altered due to the quarrying operations. The need for appropriate mitigation measures and their efficacy will be considered at planning application stage. It is therefore concluded that the site should not be excluded due to impacts on the PROW network.

Cumulative Impact

The proposed site has been assessed against policy DM12 of the KMWLP which expects that mineral development should not result in an unacceptable adverse, cumulative impact on the environment or communities. This policy was prepared in line with the NPPF which sets out similar criteria.

It is recognised other proposed site allocations for mineral working are in the surrounding area. The KMWLP notes that cumulative impacts may occur where separate developments occur near to each other and there is a need for such impacts to be taken into account. The assessment of potential impacts which could arise from development in this location has not revealed that unacceptable cumulative impacts would arise that could not be satisfactorily mitigated against, however cumulative

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¹⁶ KCC (Amey) Land Stability Assessment Technical Report August 2018

impacts will require further consideration if a proposal were to come forward.

<u>4.0 Conclusion - M13: Stonecastle Farm Quarry Extensions,</u> Hadlow/Whested

The volume of sharp sand and gravel needed to meet KMWLP requirements can be supported by allocation of this site. Adverse impacts associated with mineral development in this location can be addressed and satisfactorily mitigated through the planning application process.

The detailed assessment work has concluded that the Stonecastle Farm Quarry Extension site (M13) is acceptable in principle for mineral development, subject to compliance with the development management considerations, with particular reference to:

Transport

- A detailed transport assessment to demonstrate compliance with KMWLP Policy DM13
- All quarry traffic to utilise the existing Stonecastle Quarry access onto Whetsted Road, and only turn left when exiting the site.
- The site shall only be worked sequentially to the permitted phases at Stonecastle Farm Quarry or the Moat Farm Quarry (should planning permission be granted for this latter site). To avoid unacceptable impacts on the local highway network the M13 Stonecastle Farm Extension, the Moat Farm Site (M10) and the permitted Stonecastle Farm Quarry shall not be worked concurrently.

Water Resources

- A minimum 16 metre buffer will need to be provided between extraction and nearby watercourses.
- Demonstration that the site will have no adverse impacts on hydrology or hydrogeology. This should be undertaken in liaison with South East Water and the Environment Agency and will need to include (amongst other matters) the following:
 - o The risk of pollutants entering the restored open lakes
 - A Hydrometric Monitoring Strategy; the results of this should be regularly reviewed and the conceptual model of the site updated as required
 - Risk to derogation of the activities subject to Abstraction Licenses in the vicinity of the site.
- Compliance with the Environment Agency's approach to the management and protection of groundwater as outlined within their Groundwater Protection Position Statements and take all measures and precautions necessary to avoid deterioration in the quality of groundwater below the site.
- The restoration plan will need to have reference to the proposed lakes and their interface with the nearby watercourses in accordance with Environment Agency advice. It must also include evidence to demonstrate how the integrity of nearby watercourses will be retained.
- The two abstraction licenses within the vicinity of the site will need to be taken into account.
- Dewatering techniques must not be used that would impact local water resources.
- Any application will need to be accompanied by a detailed flood risk assessment.

Amenity

- A lighting, noise, dust and vibration management plan should be completed, setting out how unacceptable impacts will be avoided. A detailed dust assessment and management plan should be submitted which follows best practice and any national Government guidance (e.g. Planning Practice Guidance).

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- Compliance with policy DM11 of the KMWLP in respect of health and amenity.

Biodiversity

- A detailed ecological appraisal setting out any mitigation measures needed to ensure there
 are no unacceptable impacts on Kent's biodiversity assets
- Detailed restoration proposals will need to demonstrate that the potential loss of the BAP habitat deciduous woodland is offset by replacement woodland provision within the proposed restoration plan. This should include a range of trees and shrub sizes to create a vertical design element to the planting.
- Any operations should exclude the Ancient Woodland and a suitable buffer should be employed as to not impact on the designation directly or indirectly
- Restoration scheme should incorporate additional woodland planting where possible, including native evergreen species along the western and southern boundaries of the proposed quarry extension site.
- Suitable buffer zones and mitigation to be proposed to mitigate impacts to Local Wildlife Site TM20.
- The developer to appropriately manage the Nuttall's pondweed and Crassula in the area.
- The need for compensatory replacement habitat

Heritage

- Further assessment of the potential impact of proposals on the historic landscape and surviving features is necessary and should account of the historic landscape should be taken during works and in later site landscaping and restoration programme.
- The impact of proposals upon the Listed Buildings should be fully assessed and mitigation measures undertaken to avoid impact on their setting.
- Any planning application should be accompanied by a full archaeological impact assessment to ascertain the extent of such remains.

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M9 The Postern, Capel - Sharp Sand and Gravels

Site withdrawn by Promoter – unable to demonstrate acceptable access. **Not allocated in Pre-Submission Draft Mineral Sites Plan**.

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6 Conclusion

Following the Call for Sites in 2016, 19 mineral sites were nominated for consideration for potential allocations in the Mineral Sites Plan. Nine of the sites were selected following initial assessment as 'Options' i.e. sites that were considered potentially suitable for allocation in the Kent Mineral Sites Plan, subject to public consultation and detailed technical assessment. These sites have been subject to public consultation, detailed technical assessment and Sustainability Appraisal. The work has concluded that three of the sites should progress as Preferred Options Sites for allocation in the Mineral Sites Plan – one soft sand site and two sharp sand and gravel sites. These sites are considered acceptable in principle for mineral development, subject to planning applications demonstrating that relevant development management criteria can be met.

In summary, the DTA concluded the following:

2.7 In summary, the DTA concluded the following:

M3 - Chapel Farm, Lenham -Western Site Suitable for allocation in Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application stage

M3 - Chapel Farm, Lenham -Eastern Site Site withdrawn by promoter – due to likely unacceptable impact on heritage asset. **Not allocated in Pre-Submission Draft Mineral Sites Plan**.

M8 - West Malling Sandpit, Ryarsh

Site not allocated in Pre-Submission Draft Mineral Sites Plan – inconsistent with green belt policy with regard to inappropriate development. An alternative promoted soft sand site at Chapel Farm, Lenham lies outside the Green Belt and is considered acceptable in principle to meet the soft sand mineral requirements in Kent. It is not therefore reasonable to conclude that the necessary 'very special circumstances' exist to override the presumption against inappropriate development within the Green Belt. It is noted that the site is within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) and the impacts upon the AONB are uncertain.

M2 - Lydd Quarry/Allen's Bank Ext, Lydd Site not allocated in Pre-Submission Draft Mineral Sites Plan - Likely unacceptable impacts upon the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), the Special Area of Conservation (SAC) and the Ramsar Site; Likely unacceptable impact upon the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). In respect of parcel 23 (Allen's Bank), the likely unacceptable impact upon archaeological interests. It is noted that the impact upon the setting and character of the historic town of Lydd is uncertain.

M7 – Central Road, Dartford Site not allocated in Pre-Submission Draft Mineral Sites Plan – Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable loss of

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	biodiversity habitat, impact upon Local Wildlife Sites (LWS) and UK Biodiversity Action Plan (BAP) interests, likely unacceptable impacts on residential amenity, likely unacceptable air quality impact on AQMA and conflict with Local Plan open space objectives.
M10 - Moat Farm, Five Oak Green, Capel	Suitable for allocation in Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application stage
M11 – Joyce Green Quarry, Dartford	Site not allocated in Pre-Submission Draft Mineral Sites Plan - Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable air quality impact on AQMA, likely unacceptable loss of biodiversity habitat, impact upon LWS and UK Biodiversity Action Plan (BAP) interests and uncertainty that restoration proposals would meet ecological objectives to replace habitat and conflict with Local Plan open space objectives. The mineral proposal is considered to be inappropriate development within the Green Belt through restoration proposals and harm arising from highway impacts, air quality and biodiversity impacts.
M12 - Postern Meadows, Tonbridge	Site not allocated in Pre-Submission Draft Mineral Sites Plan - insufficient evidence to complete DTA in order to conclude with any certainty that the development is acceptable in principle for mineral development.
M13 - Stonecastle Farm Quarry Ext, Hadlow/ Whested	Suitable for allocation in Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application stage
M9 The Postern, Capel	Site withdrawn by Promoter – unable to demonstrate acceptable access. Not allocated in Pre-Submission Draft Mineral Sites Plan .

The three sites M3 - Chapel Farm, Lenham - Western Site, M10 - Moat Farm, Five Oak Green, Capel and M13 - Stonecastle Farm Quarry Ext, Hadlow/ Whested are considered suitable for allocation in the Pre-Submission Draft Mineral Sites Plan, subject to meeting development management criteria at planning application . These 3 sites are incorporated into the Pre-Submission Draft of the Kent Mineral Site Plan as site allocations for independent examination by an Inspector appointed by the Secretary of State for Housing, Communities and Local Government.

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<u>Appendix 1 – Initial Site Assessment - RAG Sensitivity Scoring Criteria</u>

Opportunity/Constraint	RAG Sensitivity S	Score				
	RED	RED-AMBER	AMBER	AMBER-GREEN	GREEN	Information source
Landscape Designations/Visual Impact Key considerations: The significance of any landscape and visual impact is dependent on a number of factors, such as the proximity to sensitive viewpoints, presence of screening features, direct effect on landscape fabric, existing landforms and the proximity to Kent's landscape designations of national importance. Kent has two nationally important landscape designations- the Kent Downs and the High Weald Areas of Outstanding Natural Beauty (AONB).	The site is in the AONB, there are no exceptional circumstances and the development cannot be demonstrated to be in the public interest ² .	The site is in the AONB but there may be exceptional circumstances and it may be in the public interest. The site is adjacent to or within the setting of the AONB and could have a major adverse impact on the landscape designation that could require high level mitigation. The site falls outside the AONB and could have a major adverse impact on the landscape that could be difficult to mitigate. The site is considered to have a major impact upon local landscape.	The site is the AONB, and there are exceptional circumstances and it is in the public interest but it could have an adverse impact on the landscape designation. The site is adjacent or within the setting of an AONB and could have a moderate adverse impact on the landscape designation, that could require medium level mitigation. The site falls outside the AONB and could have a moderate adverse impact on the landscape that could require medium level mitigation. The site falls outside the AONB and could have a moderate adverse impact on the landscape that could require medium level mitigation. The site is considered to have a moderate impact upon local landscape.	The site is adjacent to or within the setting of the AONB and could have a minor adverse impact on the landscape designation, requiring low level mitigation. The site falls outside the AONB and could have a minor adverse impact on the landscape that could require low level mitigation. The site is considered to have a minor adverse impact upon local landscape.	The site is not within the AONB or its setting and would have no impact on the landscape designation. The site falls outside the AONB and could have a very minor impact on the landscape designation that could be addressed with mitigation. The site is considered to have no impact upon local landscape.	GIS Data The Kent Landscape Assessment Parts 1 and 2 (2003) Landscape character area design guidance (Kent Down AONB & High Weald AONB) Consultation with landscape specialists and Natural England. Promoter of site

² NPPF paragraph 116 development proposals in AONB designations should be refused unless there are exceptional circumstances that can be demonstrated in the public interest.

RAG Sensitivi	ty Score				
Nature Conservation and Geodiversity Key considerations: Proximity to international designations. E.g. SAC, SPA, Ramsar Proximity to national designations. E.g. SSSI, National Nature Reserve, Ancient Woodland. Proximity to Local Designations. E.g. Regionally important Geological and Geomorphological Sites (RIGS), Local Wildlife Sites, SNCI and Biodiversity Action Plan (BAP) Habitats ³ With all designations the proximity, perceived adverse impacts and the potential for mitigation should be considered. Potential for enhancement of local designations can be taken into account.	have on have a significant effect on international designations, mitigation measures are available but are of a nature which means they may not be deliverable. Site is within or could have unacceptable adverse impact on national and/or local	The site is likely to have a significant effect on international designations, mitigation measures are possible but not included in the proposal. Site is within or could have unacceptable adverse impact on national and/or local designations but there is persuasive evidence of the impacts can be mitigated or compensated such that there is net benefit. Impact is likely to be severe to moderate. The site is considered to have a moderate impact upon local sensitivity receptors.	The site could potentially impact international designations and mitigation measures are included in the proposal which are sufficient enough to avoid a likely significant effect. The site is unlikely to have an unacceptable impact on national and/or local designations. Impacts could be addressed with mitigation. Impact likely to be minor. The site is considered to have a minor impact upon local sensitivity receptors.	The site is not likely to have a significant effect on international, national or local designations. The site is considered to have no impact upon local sensitivity receptors.	GIS data Consultation with Natural England and biodiversity officers Promoter of site

³ Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)

	RAG Sensitivity Se	core				
Historic Environment Key considerations: Proximity to Kent's heritage assets, including registered historic parks and gardens, Listed Buildings, a conservation area or its setting, World Heritage Sites, Scheduled Ancient Monuments, archaeological sites and features and defined heritage coastline. There is a presumption in favour of preserving Listed Buildings and their setting, nationally important archaeological remains in situ and their setting. Proposals for development should not have an adverse effect on Kent's heritage assets including its fabric, setting, amenity value and arrangements for reinstatement	The site could cause a severe unacceptable adverse impact on Kent's heritage assets and/or their setting. No opportunity to maintain or enhance historic asset.	The site may cause a major adverse impact to Kent's heritage assets and/or its setting in the absence of high level mitigation.	The site may cause a moderate adverse impact to Kent's heritage assets and/or its setting in the absence of medium level mitigation.	The site may cause a minor adverse impact to Kent's heritage assets and/or its setting in the absence of low level mitigation. High possibility to result in net planning benefit.	The site may not cause any adverse impact to Kent's heritage assets and/or its setting.	GIS data Consultation with Historic England and officers specialised in archaeology and the historic environment Promoter of site

	RAG Sensitivity Sc	ore				
(Including flooding) Key considerations: Proximity to Source Protection Zones (SPZ) or major/minor aquifers Proximity to vulnerable above-ground water bodies. The Water Framework Directive objectives seek no deterioration in current water quality and good status in all water bodies. Proximity to Flood Zones - dependent on type of development (Ref: Planning Practice Guidance*) Mineral extraction can provide opportunities for flood water and general water storage Note: The sites will be subject to a separate Sequential Testing exercise in accordance with the NPPF at Stage	The site could have a severe unacceptable adverse impact upon groundwater SPZs and/or result in the deterioration of any water resource. The site will exacerbate flood risk in areas prone to flooding. The site could have a severe unacceptable impact upon waterbodies within the site and or hydrologically connected to the site. The site is classed as: "Development should not be permitted" according to the Flood Risk Vulnerability and Flood Zone Compatibility Table in the Planning Practice Guidance" Phase 1 and Phase 2 Hydrogeological Risk Assessment would be required prior to allocation.	The site could have a major adverse impact on groundwater SPZs or water resources in the absence of high level mitigation. The site is classed as: 'Exception Test Required', according to the Flood Risk Vulnerability and Flood Zone Compatibility Table in the Planning Practice Guidance and other sources of flooding could have a major impact requiring high levels of mitigation The site may have a major impact on vulnerable water bodies in the absence of high level mitigation. Phase 1 Hydrogeological Risk Assessment would be required prior to allocation.	The site could have a moderate adverse impact on groundwater SPZs or water resources in the absence of medium level mitigation The site is classed as: 'Exception Test Required' according to the Flood Risk Vulnerability and Flood Zone Compatibility Table in the Planning Practice Guidance and other sources of flooding could have a moderate impact requiring mitigation The site may have a moderate impact on vulnerable water bodies in the absence of medium level mitigation. Phase 1 Hydrogeological Risk Assessment would be required prior to allocation	The site could have a minor adverse impact on groundwater SPZs or water resources in the absence of low level mitigation. The site is classed as: 'Development is appropriate', according to the Flood Risk Vulnerability and Flood Zone Compatibility Table in the Planning Practice Guidance and other sources of flooding could have a minor impact that can be mitigated The site may have a minor impact on vulnerable water bodies in the absence of low level mitigation.	The Site will have no unacceptable impact on water resources. 'Development is appropriate' according to the Flood Risk Vulnerability and Flood Zone Compatibility Table in the Planning Practice Guidance and other sources of flooding could have no impact. Good opportunities for flood risk mitigation.	Consultation with the Environment Agency and flood risk officers. Strategic Flood Risk Assessment (SFRA) Promoter of site

	RAG Sensitivity S	core				
Air Quality Key considerations: Emissions to air can be of concern at some facilities- dealt with at planning application stage if necessary through use of conditions and controls Proximity to Air Quality Management Areas-Impacts on AQMA could be mitigated by conditions and controls.	The site is within an AQMA, unacceptable adverse impacts cannot be mitigated.	N/A	The site is near to an AQMA or may have adverse impacts on air quality that is capable of mitigation.	N/A	The site poses low or no risk of adverse impacts to AQMAs or air quality.	GIS Data Officer assessment Promoter of site
Soil Quality Key considerations: Proximity or location of best and most versatile agricultural land. Where significant development of agricultural land is unavoidable, poorer quality land should be used in preference to higher quality. Consider location of sensitive land and soils Potential for enhancement	The entire site contains best and most versatile agricultural land which could be severely impacted by the development.	Large parts of the site contain best and most versatile agricultural land which could be majorly impacted by the development.	Small parts of the site contain best and most versatile agricultural land which could be moderately impacted by the development Opportunities for mitigation and restoration exist.	The could impact best and most versatile agricultural land which could require minor mitigation. Good opportunities for mitigation and restoration.	The site contains low quality soil There could be opportunities to restore the site such that the quality of soil is enhanced.	GIS data Consultation with landscape officers and Natural England if necessary Officer Assessment Promoter of site

	RAG Sensitivity S	core				
Public Rights of Way (PRoW)	The site is likely to cause severe unacceptable adverse	The site is likely to cause major adverse impact upon the PRoW	The site could cause moderate adverse impact upon the PRoW	Site is in the vicinity of a the PRoW network and Kent's Long	Site will have no effect on PRoW network and Kent's Long Distance	GIS data Consultation with the
Key considerations:	impact upon the PRoW without satisfactory	network and Kent's Long Distance	network and Kent's Long Distance	Distance Trails and may only cause minor	Trails.	County Council's PRoW officers
Consider the presence of public rights of way (Highways Act 1980 Section 41)	provision for diversion and/or mitigation. Significant adverse impact upon Kent's	Trails but this could be satisfactorily diverted and/or extensively mitigated	Trails but this could be satisfactorily diverted and/or mitigated.	adverse impacts on PRoW network and Kent's Long Distance Trails	An opportunity for enhancement has been identified.	Promoter of site
Highways Act 1980 Section 130(1), duty of highway authority to assert and protect the rights of the public to the use and enjoyment of any highway	Long Distance Trails.					
Impact on long distance trails (e.g. North Downs Way and England Coast Path)						
Potential for enhancement (would be sought at all sites)						

	RAG Sensitivity So	ore				
Transport (Including Access) Key considerations: Proximity to Kent's Trunk Roads, Primary Route Network and Secondary Route Network will be assessed, including the presence of width, height and weight restrictions along these routes	There are severe issues with access to the Primary Route Network	The site could have a major adverse impact on transport and access in the absence of high level mitigation. There are major issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated in principle but this might	The site could have a moderate adverse impact on transport and access in the absence of medium level mitigation. There are moderate issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could be mitigated	The site could have a minor adverse impact on transport and access in the absence of low level mitigation. There are minor issues with access to the Primary Route Network and Secondary Route Network. The identified impacts could likely be mitigated	The site will not give rise to any adverse impacts upon transport and access to Primary and Secondary Route Network.	GIS data Officer assessment Promoter of site
Services and Utilities Key considerations: Sites need sustainable access to utilities. Equally, they should not interfere with any utilities which pass underneath. Mitigation measures will be considered in terms of cost and benefits.	The site contains services or utilities which could be severely impacted on and no mitigation measures can be used.	The site contains services or utilities which could require major mitigation through rerouting, and/ or the location of cables/pipes hampers the ability to maximise capacity yield from the site.	through planning obligations. The site contains services or utilities that would require consideration through re-routing or other medium levels of mitigation	through planning obligations. The site is near to services or utilities and any minor adverse impacts may require low-level mitigation.	There are no services or utilities near to, or within the site.	Officer assessment Utility providers Promoter of site
Utilities include water, gas, electricity and telecommunications, as well as railways, HS1 and Crossrail assets.						

	RAG Sensitivity So	core				
Health and Amenity Key considerations: This includes impact of noise, dust, vibration, odour, emissions, bioaerosols, illumination, visual intrusion, traffic, quality of life and community and environment wellbeing. The National Planning	RAG Sensitivity So The site could cause severe unacceptable adverse impact on health and amenity and/or adjacent land uses with no mitigation demonstrated.	The site could cause major adverse impact to health and amenity and/or adjacent land uses in the absence of a high levels of mitigation as demonstrated.	The site may cause a moderate adverse impact to health and amenity and/or adjacent land uses in the absence of a medium levels of mitigation as demonstrated Possibility to result in net planning benefit.	The site may cause a minor adverse impact to health and amenity and/or adjacent land uses in the absence of low level mitigation. High possibility to result in net planning benefit.	The site may not cause any adverse impact to health and amenity and/or adjacent land uses.	Officer assessment Promoter of site
Policy Framework (NPPF) and the KMWLP state that the adverse impact of minerals and waste development on neighbouring communities should be minimised. Consider proximity of local communities whose amenity may be impacted						
by development Appropriate and suitable mitigation measures to reduce the risk of unacceptable adverse impacts should be considered.						

	RAG Sensitivity So					
Cumulative Impacts	The cumulation of activity at the site with	The cumulation of activity at the site with	The cumulation of activity at the site with	The cumulation of activity at the site with	There are no concerns of cumulative impacts	Officer assessment
Key considerations:	existing development will result in an	existing development may result in an	existing development may result in moderate	existing development may have some impact	resulting from the development of the site.	Promoter of site
NPPF states that	unacceptable adverse	unacceptable adverse	impact on the	on the environment and		
policies and proposals	impact on the	impact on the	environment and	community that will		
should take account	environment and/or	environment and	community that will	require low level		
of existing activity and	communities that cannot	community that will require high level	require medium level	mitigation.		
impacts, the duration and nature of proposals	be satisfactorily mitigated.	mitigation.	mitigation.			
for new or further	miligated.	mugaton.				
workings, and the						
extent of impacts that a						
particular site, locality,						
community, environment						
or wider areas of mineral working can						
reasonably be expected						
to tolerate over a						
particular or proposed						
period.						

	RAG Sensitivity	Score				
Airport Safeguarding Zones Key considerations: Aircraft are vulnerable to birdstrikes, and 80% of all strikes occur on an aircraft's take-off or landing phase of flight, therefore highlighting the necessity for wildlife management on and within proximity of an airfield. Aerodrome administrators are responsible for monitoring bird activity within the relevant radius of the aerodrome. This is to mitigate the birdstrike risk to aircraft and be aware what species are in the local area. Many types of development, including large, flat-roofed structures, landfill sites, gravel pit restoration schemes and nature reserves	The site is within an Airport Safeguarding Zone and the nature of the site is likely to attract birds and increase the risk of bird strike for aircraft. No mitigation is practical or possible.	The site is within an Airport Safeguarding Zone and the nature of the site is likely to attract birds and increase the risk of bird strike for aircraft. High level mitigation is required which may make the site undeliverable.	Site is within an Airport Safeguarding Zone. Either: Nature of the site means that it is unlikely to attract birds and increase the risk of birdstrike for aircraft. The site is likely to be deliverable through employing medium level mitigation measures so it is unlikely to attract birds and increase the risk of birdstrike.	Site is within an Airport Safeguarding Zone. Either: Nature of the site means that it is unlikely to attract birds and increase the risk of birdstrike for aircraft. The site is likely to be deliverable through employing low level mitigation measures so it is unlikely to attract birds and increase the risk of birdstrike.	The site is not within an Airport Safeguarding Zone.	CAA, NATS Officer assessment Promoter of site
Green Belt Key considerations: Within the NPPF is a presumption to consider development within the Green Belt as inappropriate. Inappropriate development is by definition, harmful to the openness of the Green Belt and should be refused except in very special circumstances. There are certain types of development which are exceptions to this rule, they do not require Very Special Circumstances.	Site constitutes inappropriate development within the Green Belt, and no substantive case for very special circumstances has been presented.	Site constitutes inappropriate development within the Green Belt and a case for very special circumstances has been presented. Major levels of mitigation may be required.	Site constitutes inappropriate development within the Green Belt, but a substantive persuasive case for very special circumstances has been presented. Medium levels of mitigation may be required.	Site constitutes inappropriate development within the Green Belt and a substantive persuasive case for very special circumstances has been presented. Low levels of mitigation may be required.	Site is not within the Green Belt. Site is within the Green Belt but it is not considered inappropriate development	GIS data Officer assessment Promoter of site

Appendix 2 - Green Belt Considerations – West Malling Sandpit (M8)

1. Introduction

1.1 This report provides details of Green Belt policy at national and local level, a summary of prevailing case law and an assessment of the M8 -West Malling Site.

2. Policy Considerations

National Planning Policy Framework 2018 (NPPF)

2.1 Green Belt policy is set out in the National Planning Policy Framework, paragraphs 133 - 147. Para 133 states: "The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

And para 134 notes:

"Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."
- 2.2 Para 141 states: "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."
- 2.3 In considering proposals affecting the Green Belt, policy (para 143 states that: "Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances".
- 2.4 Paragraph 144 states "When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. "Very special circumstances" will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.
- 2.5 For the purposes of planning decisions a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. There are a limited number of exceptions to this as set out in paragraph 145, being:
 - a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;

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- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building:
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt than the existing development; or not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
- 2.6 Certain other forms of development are also not inappropriate for the purposes of Green Belt policy provided they preserve its openness and do not conflict with the purposes of including land within it. These are listed in paragraph 146 as:

a) mineral extraction;

- b) engineering operations;
- c) local transport infrastructure which can demonstrate a requirement for a Green Belt location:
- d) the re-use of buildings provided that the buildings are of permanent and substantial construction;
- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.
- 2.7 Where a development is considered inappropriate development for the purposes of Green Belt policy, 'very special circumstances' will need to be demonstrated if projects are to be acceptable.
- 2.8 Whether 'very special circumstances' exist involves consideration of whether the harm caused to the Green Belt (or any other harm) by reasons of the development's inappropriateness is clearly outweighed by other considerations. In forming a view as to whether inappropriateness is outweighed by other considerations, it is not unreasonable to draw on the 'exceptional circumstances', listed in para 137, which must exist to justify removing land from the Green Belt. These include:
 - 1. Whether as much use as possible of suitable brownfield sites and underutilised land has been made;
 - 2. Whether the density of development has been optimised;
 - 3. Whether other authorities could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
- 2.9 Essentially therefore, for minerals development deemed inappropriate, it follows that consideration of whether the demands for the mineral can be met from elsewhere must be an important element in the decision.

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Kent Minerals and Waste Local Plan 2013-30 (KMWLP)

- 2.10 Policy DM4 and explanatory text of the adopted KMWLP relates to Green Belt. The Policy states:
 - 'Proposals for minerals and waste development within the Green Belt will be considered in light of their potential impacts and shall comply with national policy and the NPPF.'
- 2.11 The explanatory text in Section 7.3 of the KMWLP recognises national guidance on the purpose of the Green Belt and what constitutes inappropriate development. Paragraph 7.3.2 states "Proposals for minerals and waste development within the Green Belt will be considered in light of their potential impacts, national policy and the National Planning Policy Framework".
- 2.12 Paragraph 7.3.3 states "There is a presumption against inappropriate development within the Green Belt. Inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very special circumstances. When considering any planning application, the planning authority will ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."
- 2.13 Paragraph 7.3.4 provides guidance on what constitutes inappropriate development, It states "
 The National Planning Policy Framework provides guidance on the purposes of the Green Belt and what constitutes inappropriate development. It states that minerals extraction, engineering operations and the re-use of building provided that the buildings are of permanent and substantial constriction are not inappropriate development in the Green Belt provided that they preserve the openness of the Green Belt and proposals do not conflict with the purpose of including land in the Green Belt. Processing plant, although commonly associated with mineral extraction, is unlikely to preserve openness owing to its size, height and industrial appearance and would therefore be inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed."

3 Prevailing Case Law

3.1 Prevailing case law is set out in Appendix A.

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4 Site M8 : West Malling

Proposal

- 4.1 The promoted site comprises an area of 20.8 ha of which 12ha mainly located within the western extent of the site is promoted as a potential mineral extraction area.
- 4.2 The site has the potential to yield approximately 3.1mt of soft sand and 0.5mt of silica sand. The proposed development would include mineral extraction at depths ranging from 8.1m to 24.6m and ancillary facilities such as site access roads, offices, welfare facilities, HGV and car parking. A Landscape and Visual Appraisal document prepared by Waterman Infrastructure & Environmental Limited on behalf of the promoter states that the site offices and welfare facilities would be located within a single storey unit at current ground level. Mobile plant, screener and stockpiles would be located at current ground level during the first 6-12 months of the development. The site would be worked in phases with progressive restoration involving infilling with inert wastes to follow on from mineral extraction. Overburden from phase 1 would be used to create bunds by the site entrance from Roughetts Road. Further overburden would be used to create bunds at an approximate height of 3m along the eastern boundary of the extraction area with added planting to screen the extraction activities. The site would function as a mineral extraction site for 24 years and a further 5 years to complete restoration, which aims to restore the site to its original agricultural (grade 3b) land use after 5 years by infilling with inert materials.
- 4.3 The West Malling site lies immediately south of the M20 motorway. Access is proposed from Roughetts Road and then onto the A20 which lies to the south of the site. The nearby settlement pattern is relatively dispersed, with the closest properties to the site boundary to the east along Roughetts Road and to the south of the site being 40m and 10m respectively. The Kent Downs Area of Outstanding Natural Beauty (AONB) lies to the north of the site with its southern boundary abutting the M20 motorway. Ancient Woodland is located within the promoted area to the south of the site. Whilst the originally submitted drawings indicate that the boundary with the woodland would be confirmed at a later date, the plan submitted as part of the Transport Assessment prepared on behalf of the promoter identifies the potential extraction area to the north of the ancient woodland. This would accord with a briefing document dated 28th August 2018 sent to Ryarsh Parish Council and available on the promoter's website that states that the woodland would not be worked and that a standoff of 30m is proposed. Two public footpaths run through the site and would need to be temporarily diverted during development.

Green Belt Considerations

- 4.4 For the site to be allocated for mineral extraction in the Mineral Sites Plan, the site option has to be acceptable in principle, having regard to planning policy, guidance and relevant case law. In applying Green Belt policy, there are a number of matters to be considered:
 - I. Is the development appropriate or inappropriate development?
 - II. If inappropriate, are there very special circumstances that exist that outweigh the harm to the green belt by reason of its inappropriateness or other harm resulting from the proposal?
- 4.5 Therefore the starting point for Green Belt considerations is to establish whether the development is inappropriate or not in terms of Green Belt policy. In this regard 'the development' is taken to comprise two distinct activities as follows:

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- 1. Mineral extraction
- 2. Restoration by infilling with inert waste

The assessment below therefore considers these activities separately as follows:

Mineral extraction

- 4.6 Planning policy recognises that mineral extraction is capable of being appropriate development for the purposes of Green Belt policy, where it preserves openness and does not conflict with the purposes of including land within the Green Belt.
- In terms of the proposed activity of extracting mineral at the M8 West Malling site, this would not in my view undermine the five purposes that the Green Belt seeks to achieve as set out in paragraph 134 of the NPPF and reproduced in paragraph 2.1 above. In respect of the purpose to assist in safeguarding the countryside from encroachment, it is recognised that while the mineral extraction would result in some encroachment, this would be minor in scale in the context of the Green Belt as a whole. It is also recognised that minerals can only be worked where they are found and that the nature of such development means in practice that this type of development takes place in the countryside and, in any event, is specifically recognised as not being inappropriate development within the Green Belt. I therefore consider that there is no overriding conflict from extraction with this aspect of the Green Belt policy test.
- The preservation of openness test is more finely balanced. There is no definition of openness in planning policy. As the case law referred to in Appendix 1 illustrates, the Courts have grappled with the definition and how it is interpreted. In particular this includes: "The word 'openness' is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case". Whilst it is commonly taken to be the absence of built development, openness also has a visual dimension that decision makers must have regard to in planning judgements. Openness considerations can also be influenced by other factors such as the duration of development and the reversibility of its effects, how built up the Green Belt is now and how built up it would be if development were to occur. A realistic assessment of the impact on openness will have to include consideration of both the likely perceived effect on openness i.e. from visual aspects, as well as the spatial effects of the proposal.
- 4.9 Again, the inclusion of mineral extraction in the list of potential development that can be considered appropriate development supports the view that mineral excavation is capable of meeting the NPPF policy text and that mineral extraction per-se does not automatically mean that extraction will impact upon openness such that it is considered inappropriate. To conclude that all mineral extraction is inappropriate would make the policy wording in the NPPF meaningless. Consideration needs to be given on a case by case basis, taking into account the various components proposed in the development. In this case, these are the extraction activity, the bunds proposed to screen the development, access and parking, site offices and welfare facilities, plant, screener and stockpiles.

In a context where the landscape is generally well enclosed, and where the predominant effect of development would be to reduce existing ground levels, it is unlikely that by themselves, the activity of extracting the mineral and the resulting void would result in a reduction in openness to the extent that it would be material to the openness of the Green Belt. However, there is potential that a negative impact upon openness would arise due to the location and layout of site

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compound, material stockpiles, processing plant, movement of HGVs accessing the site and screening requirements.

In respect of the site offices and welfare facilities, these would be located within a single storey unit at current ground level. Mobile plant, a screener and stockpiles would also be located at current ground level during the first 6-12 months of the development. The supporting text to policy DM4 of the Kent Minerals and Waste Local Plan, specifically recognises that "processing plant, although commonly associated with mineral extraction, is considered unlikely to preserve openness, owing to its size, height and industrial appearance and would therefore be inappropriate development". Similarly, the introduction of offices and welfare facilities and the movement of HGVs accessing the site and parking arrangements would introduce urbanising features into the countryside which would have a negative impact upon openness for the duration of the works – i.e. 29 years. Depending on their height and location, material stockpiles could also impact on openness. Three-metre-high screening bunds, together with tree planting, are proposed to mitigate the visual impact of the development for the lifetime of the activities (minimum of 24 years), however I consider that they will impact upon the openness of the Green Belt for a significant period of time.

In light of the above, I conclude that the activities associated with the extraction of the mineral proposed at this location would not preserve openness and so would constitute inappropriate development. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances which will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

This conclusion, that the development is inappropriate, is consistent with the position taken by the site promoter: In response to the 'Call for Sites' in 2016, the promoter of the M8 site noted that the site falls within the Green Belt, and, while noting that minerals extraction is not inappropriate development, made a case for very special circumstances as follows:

'The NPPF provides that mineral extraction is not inappropriate in the Green Belt provided it preserves openness and does not conflict with the purposes of including land in the Green Belt. Minerals can only be worked where they are found, and the proposed extraction will be a temporary use of the land, followed by restoration. The very special circumstances in this case include that the minerals are of local and national importance; a proportion is silica sand, which is understood to be nationally scarce'

Whilst the promoter is not specific about the components of the development which trigger inappropriateness, by making a case for the existence of 'very special circumstances', the promoter would appear to recognise, that the development is inappropriate for the purposes of Green Belt policy.

Very Special Circumstances: Harm v Other Considerations

Having concluded inappropriateness, a consideration of whether 'Very Special Circumstances' exists is required which involves an assessment of whether "the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations".

This assessment is usually undertaken at the planning application stage when further details are Page 252

known of a proposal and is part of the balancing act of material planning considerations. It is however required at this plan making stage to establish whether the site is acceptable in principle for allocation, given the policy wording of the Kent Mineral and Waste Local Plan and national policy on development within Green Belt.

Harm

In accordance with national policy, when weighing harm against 'other considerations', 'harm' should be taken as "potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal".

In terms of harm to the Green Belt caused by reason of the development's inappropriateness, the matter of concern relates to impacts caused by the site compound, material stockpiles, movement of HGVs accessing the site, processing plant and screening requirements.

I consider that there would undoubtedly be a negative visual impact arising from these aspects of the development, particularly for those properties and footpaths closest to the site, that would affect the perception of openness in this location. The inappropriate development is likely to be prominent in views from properties along Roughetts Road to the east and would also be visible from properties on London Road to the south and Woodgate Road to the north. Visual effects on these properties would be adverse and could be assessed as significant. Similarly, there would be an adverse visual impact experienced by users of the public rights of way affected by the site. The screening bunds (3 metres high plus additional planting on top of the bunds) proposed to mitigate the impact of the development for the lifetime of the activities (minimum of 24 years) would also impact upon openness for a significant period of time.

In establishing the nature and extent of 'any other harm' reference has been made to the detailed technical assessment (DTA) report for mineral development in this location The DTA includes an assessment of the impacts associated with the following:

- Landscape and the Kent Downs Area of Outstanding Natural Beauty (AONB)
- Biodiversity
- Historic environment
- Water environment
- Loss of grade 3 quality soil
- Local amenity (noise, dust, vibrations and visual impacts)
- Public Rights of Way (PROWs)
- Utilities/services
- Access impact on highway network
- Air Quality and health
- Need for the mineral
- Land stability

Cumulative impacts with other developments and quarrying operations within the area have also been considered.

The DTA does not conclude with any certainty that unacceptable impacts related to the matters above would occur and so it can be concluded that significant harm is unlikely.

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Other Considerations

On the basis of the current information, the following matters are considered to be matters to weighed as 'other considerations' in the determination of 'Very Special Circumstances':

- a) Need for the mineral
- b) Location of other resources and competition considerations
- c) Duration and reversibility of impacts
- d) Development without those activities that are considered inappropriate for Green Belt consideration
- e) Existence of mineral options outside of the Green Belt to meet need

These matters are considered in turn below.

a) Need for the Mineral

The promoter has identified need for the mineral as a 'Very Special Circumstance' by drawing attention to the fact that the minerals (soft sand and silica sand) are of local and national importance. The promoter asserts that the silica sand element of the reserve is in its highest purity form and is understood to be nationally scarce. It is recognised that the site provides the potential for some 3.1mt of soft sand and a further 0.5mt of silica sand. While Policy CSM2 recognises the need to specially allocate additional reserves for soft sand in the Mineral Sites Plan, development of silica sand reserves is subject to general planning considerations rather than via site allocations.

Policy CSM2 of the Kent Minerals and Waste Local Plan recognises that the aggregate landbank requirements will be reviewed through the annual Local Aggregate Assessment (LAA). The 2018 LAA provides the landbank and sales data to inform the Minerals Sites Plan requirement over the life of the Plan plus 7 years (18 years). On this basis, the Mineral Sites Plan is seeking to provide 2.5mt provision of soft sand for the life of the Plan.

Following the call for sites, two sites have been promoted and initially assessed as meeting the soft sand requirements. These sites, M8 West Malling Sandpit and M2 Chapel Farm Lenham, have the potential to yield 3.1mt and 3.2 mt of soft sand respectively. Each site therefore has the potential to meet Kent's identified need.

There is a desire from West Sussex County Council and the South Downs National Park Authority for Kent County Council to make additional provision to meet some of their needs, given development constraints arising from the location of the resource within the National Park. It is also noted that the potential for the supply of soft sand from sources in the neighbouring county of East Sussex is extremely limited.

At this time, however there is no evidenced need to demonstrate a case to make significant additional provision in Kent to meet a regional need. Furthermore, it is noted that: either of the promoted sites has the potential to generate a surplus to meet wider than Kent needs; that East Sussex's needs from Kent are already factored into the LAA derived requirements; and, that prior to the conclusion of West Sussex's and the South Downs National Park Authority's current Soft Sand Review work it is not possible to conclude that provision for a specific unmet need arising outside of Kent is justified.

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West Sussex CC and the South Downs National Park Authority are intending to publish an Issues and Options Consultation to address its soft sand requirements during January to March 2019, with the intention to publish a Regulation 19 proposed Submission Plan in Summer 2019. This work is part of their joint Local Plan Soft Sand Review, following its Inspector's report on the West Sussex Joint Minerals Local Plan in May 2018.

b) Location of other resources and competition considerations

Planning policy and guidance seeks to ensure that in meeting aggregate supply, decisions are not taken that would result in large landbanks bound up in very few sites that stifle competition. In the case of Kent, the latest Local Aggregates Assessment shows that mineral permissions for soft sand exist across the County and are operated by a number of companies. This includes Tarmac Aggregate's site at Sevenoaks Quarry, Ferns Aggregates at Addington, Roger Body at Borough Green Sandpits, Brett Aggregates at Charing Heath, Ightham Sandpits operated by H&H Celcon, Brett Aggregates at Lenham Quarry and J Clubb's site at Nepicar, Platt.

c) Duration and reversibility of impacts

Mineral activity is a temporary development, albeit in this case working would span approximately a generation. The intention would be to excavate mineral from the site over a 24-year period with phased restoration. Depending upon materials, the site would be restored back to agricultural use in some 29 years. Unlike other forms of development, at the end of this period, it is proposed that the site would revert to its current landform. There are examples in the vicinity where former mineral sites have been restored back to open countryside. Nevertheless, the harm to the Green Belt caused by the site activities would occur to a greater or lesser extent for a considerable period of time. In particular, the screening bunds, the site compound and the processing plant would be in place during the excavation and subsequent restoration activities.

d) Development without those activities that are 'inappropriate development'

A potential solution to reducing the impact upon the Green Belt would be to consider whether it is acceptable to carry out the development without those components that trigger inappropriateness. In this case this would be the deletion of the screening bunds, the site compound, material stockpiles, and processing plant. The screening bunds would however play an essential role in mitigating the visual and amenity impacts of the development, particularly for those properties closest to the activities. It is therefore difficult to conclude that the development would be acceptable without such bunding. Similarly, mineral activities of this duration require a site compound, and whilst not essential to the development, material stockpiles and processing plant are typically located as part of the mineral activity.

e) Existence of mineral options outside of the Green Belt to meet needs

As part of a 'very special circumstances' consideration, it is reasonable to consider whether there are alternative solutions that could meet the soft sand requirements in the County. In the absence of alternatives, then the 'very special circumstances' in favour of developing this site within the Green Belt would be strengthened, however, in this case, the County Council has an alternative option which would meet the soft sand need for the county – Chapel Farm, Lenham. This site falls outside the Green Belt and is therefore free from this national policy constraint.

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Furthermore, the detailed technical assessment has concluded that the Chapel Farm site is suitable in principle for development.

Conclusion (mineral extraction)

The activities associated with the extraction of minerals at the West Malling site would impact on openness and therefore constitute 'inappropriate development' for the purposes of Green Belt policy. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in 'very special circumstances'. In decision making, local planning authorities are required to give substantial weight to any harm to the Green Belt and that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.

The harm to the Green Belt caused by inappropriate development would last an estimated 24 years. As there is an alternative site option at Chapel Farm, Lenham that lies outside the Green Belt that meets the soft sand requirements in Kent and is acceptable in principle for mineral development, it is not reasonable to conclude that other considerations clearly outweigh the harm to the Green Belt. As such it cannot be said that very special circumstances exist at this time to override the presumption against inappropriate development within the Green Belt.

Restoration by infilling with inert waste

The restoration of the site to agricultural land by backfilling to existing ground levels using inert waste is considered to be inappropriate development and that 'very special circumstances' will be required to satisfy Green Belt policy. The activity falls outside the mineral extraction activity and engineering operation exemption clauses set out in paragraph 146 (a) and (b) of the NPPF.

This view is consistent with that of the Inspector who, when examining an appeal against refusal of permission for mineral extraction with restoration to agriculture (Pynesfield¹⁷), concluded that this form of restoration is inappropriate development within the Green Belt, essentially because it is not an integral part of mineral extraction, nor is it an engineering operation for the purposes of paragraph 146 of the NPPF.

Very Special Circumstances: Harm v Other Considerations

As above, having concluded inappropriateness, a consideration of whether 'Very Special Circumstances' exists is required which involves an assessment of whether "the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. This assessment is set out below.

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¹⁷ Appeal Decision APP/M1900/A/14/2218970

Harm

In assessing the harm resulting from the backfilling operation, it is necessary to establish the impacts and the extent of harm resulting from each of these. The impacts are considered to be related to:

- Highway those impacts to road users and pedestrians caused by additional HGVs transporting materials to the site (and leaving the site) resulting in congestion on the road network and impacts to the safety of pedestrians and other road users.
- Amenity and health nuisance and health impacts to residents, visitors and businesses in the area caused by for example dust and noise resulting from the backfilling activity and transporting materials to and from the site.
- Landscape and visual impacts taking account of the location within the setting of the AONB
- Water environment hydrology, hydrogeology and flood risk
- Biodiversity
- Historic Environment
- Impacts on Public Rights of Way

With regard to highway impacts, as noted in the DTA, the assessment of transport impacts has indicated that with appropriate routeing arrangements, mineral can be worked from the site without causing unacceptable impacts. It is considered that as the transport associated with the filling activity will be similar, the same conclusion, that in principle there will be no unacceptable impacts can be reached.

In terms of amenity and health, it is considered that the measures proposed to address these issues for the extraction, including screening would also ensure that unacceptable impacts do not occur.

In terms of landscape, the site would be restored to agricultural land at existing levels along with reinstatement of former hedgerows, hedgerow trees and so any harm resulting from the extraction activity would ultimately be mitigated by the filling activity. It is noted that in its response to the consultation on the site options the Kent Downs AONB unit supported the restoration of the site to agricultural land. Such restoration would ensure that views of the site from the AONB to the north are in keeping with the surrounding landscape character.

With regard to visual impacts, it is considered that mitigation of the impacts using screening bunds would incur a visual impact by itself as would the movement of HGVs accessing the site, which would adversely impact on the openness of the Green Belt. However, the infilling activity is estimated to take place over five years and so such impacts would be relatively short-term.

The Environment Agency has noted the intention to restore the site by backfilling and has not raised any in principle objection to this activity in terms of impacts in the water environment including flood risk. Infilling activity involving waste material would require authorisation by the Environment Agency in the form of an Environment Permit and this would further ensure that adverse impacts to the water environment did not arise.

With regard to biodiversity, restoration of the site to existing ground levels would not cause

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further impacts and could result in enhancements for example by replanting hedgerows.

In terms of impacts on historic environment, the DTA notes the presence of certain heritage assets but concludes that adequate mitigation could be employed to avoid unacceptable impacts.

Restoration of the site would take five years and impacts on the PROW crossing the site would remain during this period, however, restoration w=to existing ground levels would allow the PROW to be reinstated.

Other Considerations

On the basis of current information, the following matters are considered to be matters to be weighed as 'other considerations' in the determination of 'very special circumstances':

- a) Benefits of restoring the mineral excavation to agricultural land at existing ground levels including replacement of existing features such as hedgerows
- b) Need for management of inert waste by infilling

These matters are considered in turn below.

a) Benefits of restoring the mineral excavation to agricultural land

The restoration of the site in the manner proposed would result in a number of benefits as follows:

- amelioration of landscape and visual impacts
- reinstatement of existing Public Rights of Way (PROWs)
- amelioration of biodiversity impacts caused by extraction with potential for net gains in biodiversity

b) Need for management of inert waste by infilling

Materials resulting from excavation associated with other forms of development frequently require management off site and the infilling activity would provide an opportunity for such management. However, the Kent Minerals and Waste Local Plan notes that there is surplus capacity of the disposal of inert waste within Kent and so, while this activity could provide for a more convenient outlet for such wastes arising locally, overall there is no explicit need for the additional capacity.

Conclusion (Restoration by infilling with inert waste)

The activities associated with the <u>restoration by infilling with inert waste</u> are considered to be inappropriate development within the Green Belt. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. In decision making, local planning authorities are required to give substantial weight to any harm to the Green Belt and note that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal is clearly outweighed by other considerations.

The harm to the Green Belt caused by the inappropriate development is assessed as that relating

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to visual impacts related to openness caused by screening bunds and movement of HGVs accessing the site, however these would be temporary (approximately five years). There is no evidence that other impacts would result in significant harm. Significant benefits would result from the restoration activity which are considered to clearly outweigh the short-term harm and so it is considered that very special circumstances exist to override the presumption against inappropriate development within the Green Belt.

Overall Conclusion

Restoration of the mineral working by infilling to existing ground levels would constitute inappropriate development but it is considered that very special circumstances exist to override the presumption against inappropriate development within the Green Belt. However, activities associated with the mineral extraction activity also constitute inappropriate development and, by virtue of the fact that the need for the development (supply of soft sand) could currently be met at an alternative suitable site outside of the Green Belt, it is considered that very special circumstances to override the presumption against inappropriate development in the Green Belt do not exist and allocation of this site in this location would therefore be inconsistent with local and national Green Belt policy.

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Green Belt Prevailing Case Law

- The most recent and pertinent case law relevant to this assessment, is the March 2018 Court of Appeal decision in the case of R (Samuel Smith Old Brewery (Tadcaster) and Oxton Farm) v North Yorkshire County Council and Darrington Quarries Ltd [2018] EWCA Civ 489. The case involved a challenge to a planning permission for a 6-hectare quarry extension in the Green Belt at Jackdaw Crag Quarry. The development would lead to an increase in the existing quarry area of approximately 24% and produce around 2 million tonnes of crushed rock over a period of 6-7 years.
- In that case the applicant (Darrington Quarries Ltd) did not justify the development on the basis of there being 'very special circumstances' for the purposes of paragraphs 87 and 88 of the 2012 NPPF but contended that the proposal came within the 'mineral extraction' exception under paragraph 90, and was therefore not 'inappropriate development in the Green Belt'.
- The officer's report to committee concluded that, when considering applications within the Green Belt, it is necessary to consider whether the proposed development would firstly preserve the openness of the Green Belt and secondly not conflict with the purposes of including land within the Green Belt. The officer concluded that openness is not defined but is commonly taken to be the absence of built development. Because the application site abutted an existing operational quarry, it would not introduce development of a scale considered to conflict with the aims of preserving the openness of the Green Belt. She concluded that proposed screening could protect the environment and residential receptors from potential landscape and visual impacts, and the restoration of the temporary quarry and the fact the proposal doesn't conflict with the aims of the Green Belt, meant that it would not materially harm the character and openness of the Green Belt.
- 4. The Appellant, Samuel Smith Old Brewery, challenged the permission, contending the Council had fundamentally misconstrued and misapplied paragraph 90 of the 2012 NPPF [now para. 146] including by failing to take into account visual impacts when considering whether a proposal would 'preserve the openness of the Green Belt' for the purposes of the proviso of paragraph 90. In the High Court, Justice Hickinbottom accepted that the Council had failed to take visual effects into account in the context of potential impacts on openness, but dismissed the claim on the basis that the Council had not been legally required to do so (or alternatively that had such effects been taken into account, the conclusion the openness would be preserved would have been the same).
- The Appellant appealed and the Court of Appeal allowed their appeal. Lord Justice Lindblom held that:
 - "....when the development under consideration is within one of the five categories in paragraph 90 and is likely to have visual effects within the Green Belt, the policy implicitly requires the decision-maker to consider how those visual effects bear on the question of whether the development would 'preserve the openness of the Green Belt'. Where that planning judgement is not exercised by the decision maker, effect will not be given to the

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policy. This will amount to a misunderstanding of the policy, and thus its misapplication, which is a failure to have regard to a material consideration, and an error of law."

- Lord Justice Lindblom went on to find that it was clear that the Council had committed such an error in this case. The Council had limited its consideration of the effects of the development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the Council's own assessment of the likely effects of the development on the landscape, visual impact on openness was 'quite obviously' relevant to its effect on the openness of the Green Belt.
- Previously, the Courts have grappled in some detail as to the meaning and effect of the policy in Paragraph 90 (now Paragraph 146). In Europa Oil and Gas Ltd. V Secretary of State for Communities and Local Government [2013] EWHC 2643 Justice Ouseley concluded that;
 - "...as Green Belt policies NPPF 89 and 90 demonstrate, considerations of appropriateness, preservation of openness and conflict with Green Belt purposes are not exclusively dependent on the size of building or structures but include their purpose...one factor that affects appropriateness, the preservation of openness and conflict with Green Belt purposes, is the duration of development and the reversibility of its effects...minerals can only be extracted where they are found..."
- In Timmins and another v Gelding Borough Council [2014] EWHC 654, Justice Green said that:
 - "...any construction harms openness quite irrespective of its impacts in terms of its obtrusiveness or its aesthetic attractions...there is a clear conceptual distinction between openness and visual impact...it is wrong in principle to arrive at a specific conclusion as to openness by reference to visual impact."
- In R (on the application of Lee Valley Regional Park Authority) v Epping Forest District Council [2016] EWCA Civ 404, when referring specifically to the broad and basic statement of national Green Belt Policy, with emphasis on the "essential characteristics of the Green Belt" as
 - ... "openness and their permanence" Lord Justice Lindblom said that; "...the concept of 'openness' means the state of being free from built development, the absence of buildings as distinct from the absence of visual impact."
- In Goodman Logistics Developments (UK) Ltd v Secretary of State for Communities and Local Government and another [2017] EWHC 947 the planning inspector, on appeal, found that development, simply by its physical impact, would have a significant adverse impact on the openness of the Green Belt. Having reached that conclusion, the inspector said that an assessment of the visual impact of the development was not relevant to the assessment of the impact of openness. The developer appealed, and the question for the court was whether the visual effect of development could be taken into account as reducing the harm that development would cause to the openness of the Green Belt. The judge in that instance decided that visual

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harm and/or perception was an "obviously material" consideration and that the perceived effect upon openness could be less than might be expected because, for example, the development would have a limited effect upon people's perception of openness from beyond the boundary of the site.

Important to understanding the extent of what is capable of being relevant to openness, in **Turner v Secretary of State for Communities and Local Government [2016**] EWCA Civ 466 Lord Justice Sales summed up the concept of openness in the following terms:

"The concept of 'openness of the Green Belt' is not narrowly limited to the volumetric approach suggested by [counsel]. The word 'openness' is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspects of openness which the Green Belt presents. The question of visual impact is implicitly part of the concept of 'openness of the Green Belt' as a matter of the natural meaning of the language used in para 89 of the NPPF [2012]...There is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' and the merging of neighbouring towns, as indeed the name 'Green Belt' implies. Greenness is a visual quality...Openness of aspect is a characteristic quality of the countryside, and 'safeguarding the countryside from encroachment' includes preservation of that quality of openness."

In the appeal decision (APP/M1900/A/14/2218970) for mineral extraction and restoration to agriculture at Pynesfield, Maple Cross, Rickmansworth, the Inspector concluded that the infilling of the mineral void was inappropriate development. The decision recognised that the openness of the green belt would be preserved by the infilling activity and that it shared some characteristics with 'engineering operations', but it did not fall within this definition, nor that it was an integral part of mineral extraction. Whilst clearly consequent upon the extraction, the operation was necessitated by the chosen restoration strategy rather than the extraction itself.

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Appendix 3 - Ryarsh Protection Group representation to Kent County Council, November 2018 - West Malling Sandpit (M8)





WHY RYARSH IS AN INAPPROPRIATE LOCATION FOR THE PROPOSED M8 QUARRY DEVELOPMENT

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Photo: May 2018 – Public footpath leading through the undisturbed ancient woodland, identified as 'The Roughetts' in Ryarsh. All access to this tranquil area would be cut off and damaged if the proposed site were to be developed.

INTRODUCTION

The Ryarsh Protection Group (RPG) is an action group working alongside Ryarsh Parish Council and surrounding communities. It exists to help residents and local communities with local issues. Currently, the priority is to focus objection on the proposed site M8, also known as 'West Malling Sandpit' and 'Ryarsh Quarry'.

This report which has been produced for the benefit of all stakeholders, including Kent County Council (KCC), and presents 32 justifications as to why the proposed M8 site is unsuitable for a sandpit/quarry. It has been compiled following discussions with residents and local communities. Further information has been sought from experts within their field.

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WHY RYARSH IS UNIQUE AND AN INAPPROPIRATE LOCATION FOR THE M8 QUARRY DEVELOPMENT

 The proposed site is located in the centre of an ancient Saxon village and community, situated very close to homes, three schools, four churches, three public houses/restaurants and other public establishments.



Photo: Duke of Wellington, Ryarsh - Originating circa 1516, this public house is a historical landmark

The quarry would seriously impact the local community and will have a
detrimental effect on the everyday lives of residents and visitors - including
severe impact to their health and wellbeing.

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- 3. The proposed site is adjacent to the Kent Downs, an Area of Outstanding Natural Beauty (AONB).
- 4. The proposed site is on **elevated landscape**. A quarry would **destroy the openness of this landscape** and would be seen for miles around, including from the Kent Downs AONB.
- 5. The proposed quarry would be seen and heard from popular walking routes including Pilgrims Way and North Downs Way located on the North Downs ridge, blighting the surrounding area. The noise generated from quarry activities would impact these amenities. Recent studies show the cumulative impact of such noise, including that from the adjacent M20 motorway, has a detrimental impact on general health and wellbeing.
- 6. The quarry and its services lights, noise, dust, fumes and vibration, etcetera, are adjacent to the locally and nationally important M20 motorway. The M20 is a major entry route into the UK by tourists and businesses from Europe, and forms part of European Route E15. If positioned here, the quarry operations will have a huge visual impact on the Ryarsh environment and on the landscape character. This applies even if a bund or mound is constructed around the site. The visual impact cannot be mitigated by earth constructions to disguise a huge quarry.
- 7. The proposed site is sandwiched in **between two major roads of both national and local importance**, the M20 and A20. Both of which already cause significant noise pollution, air quality and traffic issues for the Ryarsh community.
- 8. Ryarsh and its residents have compelling first-hand experience of repeated breaches of operational procedures by sandpit operators and although the operators may subsequently be fined, they often continue to disregard restrictions to the detriment of residents.

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Photo: February 2018 – Residents were left devastated when a large number of trees were completely removed along the borders of the M20, causing many to have sleepless nights from the increased noise levels. The proposed quarry site is adjacent to this section of the motorway, with the AONB to the right. Two Emergency Refuge Areas (ERA's) are currently under constructed either side of the M20 at this location, bordering site M8.

9. Residents in Ryarsh that live near the motorway are already exposed to shockingly high levels of consistent noise pollution. The Environmental Study Report, conducted by Jacobs Atkins for the M20 Smart Motorway Programme in February 2017, revealed that numerous properties are subject to daytime noise levels in excess of 70 decibels (dB). These noise measurements were taken prior to the extensive tree removal which provided a natural sound buffer. The World Health Organization and the European Environment Agency report than anything above 55dB severely impacts health and wellbeing. Areas either side of Roughetts Road overbridge are also identified by the Department for Environment, Food & Rural Affairs (DEFRA) as Noise Important Areas. A quarry within the boundaries outlined by site M8 would expose these same residents to additional noise pollution and disruption.

The readings show an average decibel reading at Roughetts Row of 73dB over an

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18-hour period. It also details that Roughetts Road on the coast bound carriageway endures 76dB on average over an 18-hour period.

The European Environment Agency when quoting the World Health Organization, state that "During the night, high outdoor noise levels can cause sleep disturbance, such as body movements and wakening, starting at levels below 40dB, and with effects on the cardiovascular system that become apparent above 55dB. All these impacts can contribute to premature mortality".

Approving a noisy development such as a quarry, knowing that residents in proximity of both the M20 and the proposed M8 site are already blighted by noise above and beyond acceptable levels, would be considered negligent.

- 10. The road bordering the proposed site, namely Roughetts Road, is narrow. Lorries will have little option but to mount the pavement. Access onto the A20 is uphill with heavy lorries accessing from a standing start. Joining the A20 traffic under these circumstances is fraught with difficultly, especially in the darker winter months see recent incident below:
 - a. 20 September 2018 A20/Hawley Drive Serious road traffic collision causing 2-hour delay.



Photo: 20 September 2018 - A20 / Hawley Drive accident



Photo: July 2018 – Ryarsh resident captures the moment three articulated lorries encountered another travelling in the opposite direction on the narrow roads of Workhouse Road and Park Farm Road.

11. There is already substantial traffic pressure on the surrounding area with the dramatic increase of large, heavy vehicles. With the recent approval of a

refrigeration unit on Birling Road, additional HGV's are already accessing our local small roads.

12. The proposed site has prevailing south-westerly winds and is positioned on higher ground – the noise and air pollution, including silica dust, would be blown across the community, including Ryarsh Primary School, Ryarsh Park and Leybourne Chase. In the absence of baseline dust measurements the photo on the right provides evidence as to the amount of detectable pollution that is currently airborne in and around site M8. This vehicle pictured was parked on the boundary of the proposed site for one week.



Photo: July 2018 - Layer of dust adhered to a car parked for one week on the boundary of the proposed site.

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Photos: May 2018 - Resident encounters multiple quarry vehicles along the narrow lane of Woodgate Road and Trottiscliffe Road with dust being made airborne and taken by the wind. This is now a regular occurrence.

13. It is possible that the community is already impacted by pollution from the M20 and a new proposed quarry would only exacerbate this. As advised by Professor Frank Kelly, of King's College London, the Ryarsh Protection Group requested Kent

County Council to undertake baseline particulate pollution measurements to establish the current ambient particulate matter (PM) concentrations in the community. If they are near any of the World Health Organization recommended limits, then the likelihood that the increased dust load from the quarry activity and/or lorry emissions transiting to, and from the quarry will push the particulate matter concentrations above these limit values.

At this time, the RPG have not received an update from Kent County Council on this subject – which was requested 9 April 2018.

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Photo: May 2018 - Ancient trees and woodland are located within the proposed quarry boundaries

- 14. The quarry would remove key public rights of way, restricting access to and between the Kent Downs and the ancient woodland, 'The Roughetts'. These are precious amenities that residents and visitors rely on as the only walking routes linking the communities of Addington, Ryarsh, Ryarsh Park, Birling, Leybourne Chase and into West Malling. Ramblers, dog walkers and the like, will be forced to go elsewhere to enjoy open green landscape and to exercise and relax near their homes. This would lead to more car journeys, compounding stress for residents and visitors. These footpaths and the amenity they provide will be lost forever.
- 15. Ancient woodland and 'The Roughetts' are within the proposed quarry boundaries.
 The quarry would remove the opportunity to visit the untouched land and woodland.
 This land would never be the same again.

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- 16. Additional **ancient trees** are located within the proposed site.
- 17. The proposed site and areas surrounding it are home to an abundance of wildlife such as species of newts, bats and owls, dormouse and buzzards. Sightings of deer and wild boar on the site have also been reported.
- 18. Disturbance of the untouched land could **contaminate the aquifer**. Local water flows into the brook close to the site which could impact wildlife and biodiversity downstream. Widely documented research on silica sand found in streams and brooks showed that it has the potential to kill marine wildlife.
- 19. Aquifer and water table levels are high in this location. Extracted sand may require processing on site additional machinery required, would generate even more noise, dust, vibration, light and disruption.





Photo: April 2018 - The burst brook positioned south of site M8

Photo: April 2018 - Stagnant water on site M8

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- 20. Commitments made to our communities during the original planning stages are often amended and are perceived to favour the site operator. The nearby Wrotham Quarry which is similar to the M8 proposal, has recently expanded their boundary, including going under roadways in order to obtain greater access. Another nearby quarry is currently being targeted for future housing under the Borough Green Garden City project, instead of the open green space restoration that was originally promised.
- 21. The cumulative impact and disproportionate burden placed on the community from previous and current developments is unreasonable, such as: quarries, landfills, the brickworks factory, creation of the M20 (subsequently splitting the village and community), the collapse of East Street bridge and delay of its reinstatement, the current M20 Smart Motorway construction works with two emergency refuge areas, a local existing quarry 800 metres away and other nearby developments. Ryarsh and the wider community should not have to suffer from what is clearly disproportionate burden.
- 22. The site is close to historically significant buildings including St. Martins Church which dates back to the Norman era, listed buildings and the home where a translator of the Doomsday Book once lived.
- 23. Ryarsh is a unique Kent village and has a hard working, vibrant community whose residents contribute greatly to its success, a fact Kent County Council can be proud of. The village:
 - a. Dates back to Saxon times.
 - b. Residents understand and respect the M20 that splits their village.
 - c. It has embraced two new developments, Ryarsh Park and Leybourne Chase, which are intrinsically linked to the ancient parts of the village via the public footpaths and roads.
 - d. Ryarsh residents contribute hugely to the wider economy.

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Photo: March 2018 – St. Martins Church in Ryarsh located just a few hundred metres from the proposed site. Public footpaths link the surrounding villages and the new developments; Ryarsh Park and Leybourne Chase, to the church.



Photo: February 2018 – Public footpath MR152 from Roughetts Road. This section of the footpath links Birling, Ryarsh, Ryarsh Park, Leybourne Chase, passed St. Martin's Church with the neighbouring village of Addington and beyond. Development of site M8 would bring an end to the connection between these communities.

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Photo: February 2018 - The community congregated to demonstrate their firm opposition to the M8 proposal

24. Unanimous objection to the proposed M8 development has been lodged with Kent County Council by all local parishes including, Ryarsh Parish Council, Birling Parish Council, Addington Parish Council and Leybourne Parish Council, and over

1266 individual objections. Ryarsh residents have made clear their total objection to this quarry by their determination in writing letters of objection and organising public events designed to demonstrate their opposition to having a quarry in the midst of their community.

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25. Thoroughly detailed letter of **response from our MP Tom Tugendhat urging KCC to reconsider** the proposal and the impact on the wider community:

"With a long history of quarrying in Ryarsh, I would be grateful if Kent County Council would look closely at the numerous issues which come into question regarding this site"

"I cannot emphasise enough how this issue has engaged the community and I hope that this will be recognised by Kent County Council"

> - Tom Tugendhat MP 7 February 2018

26. The Ryarsh Protection Group believe the **environmental reports** produced by the site's promotor have not been executed correctly and are therefore **not fit**

for purpose:

- a. The mats supposedly for the use of carrying out fauna investigations, were discovered draped over fences around the site.
- b. The noise monitoring survey
 conducted by contractors on behalf
 of the sandpit promotor was also



Photo: July 2018 – Resident encountered the fauna recording equipment hanging over fencing

flawed. MP Tom Tugendhat requested assurance that Kent County Council would not apply great weight to the results:

"I am concerned that this equipment, however well intentioned, will not be able to provide a fair analysis of the noise situation in Ryarsh and shall provide evidence which can be easily challenged should KCC look to use it as part of its evidence base. I'd like your assurance in this regard that you won't be applying great weight to its results"

> - Tom Tugendhat MP 3 August 2018

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- 27. Kent has an abundance of sand according to KCC. The RPG encourage KCC to seek alternative sites, away from homes, schools and village communities.
- 28. **Ryarsh is being sacrificed** because unlike other parts of the south east, such as Sussex and Surry, Kent does not enjoy national park status even though sand baring typography is similar.

Site	Estimated Workable Reserve
Chapel Farm, Lenham	4mt
West Malling Sandpit, Ryarsh	3.1mt

2.12 These sites would provide a surplus of around 5mt over the Plan period. This 'surplus' is necessary as it would give flexibility to account for: sites not coming forward as anticipated; yields being lower than anticipated, or demand increasing over the Plan period. Furthermore, the adopted KMWLP recognises that soft sand supplies in Kent are relatively abundant, whereas they are scarce in other parts of the south east of England5 and so additional reserves may help meet increasing demand in other areas and potential for export of materials to serve wider soft sand markets. This may become increasingly the case in the South East as soft sand resources are limited in distribution and potentially constrained by protective designations, such as National Parks.

Image: Point 2.12 of Kent County Council's Minerals and Waste Local Plan indicating Ryarsh would "provide a surplus".

- 29. A quarry would provide no benefits, economic or otherwise, to the community the development would only benefit the quarry operator and two land owners at the expense of residents and the local community.
- 30. The recent introduction of the M20 Smart Motorway Programme has occurred due to the increased quantity of traffic using this major road. The scheme will result in a permanent running lane being created from the current hard shoulder on either side.
 Ongoing maintenance will be required on the M20, adjacent to the proposed M8 site. This maintenance would be taking place throughout the life of the proposal.
 These simultaneous activities would place significant pressure on the rural area.
- 31. Residents are extremely concerned about **increased pollution from slow-moving vehicles**. The World Health Organization (WHO) has placed outdoor air pollution among the top ten health risks faced by humans, linking with seven million premature deaths a year. WHO classified outdoor air pollution as being carcinogenetic to humans in 2013, as smoking was in 1985. Pollution levels inside

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cars were found to be up to 40% higher while in traffic jams or at a red traffic light compared to free-flowing traffic conditions.

Additionally, residents are concerned with **traffic delays** and **congestion on local infrastructure**, especially roads being unable to cope with current demand that impact home and business life. Recent examples include:

- a. 4 October 2018 M20 J4-5 Serious road traffic collision causing 2-hour+ delay.
 Caused traffic to use surrounding roads including A20 and local roads such as Roughetts Road and Offham Road.
 - b. Potential risk of increased M20 congestion and pollution resulting from Operation Brock (M26), Operation Stack (M20) and Brexit.



Photo: 4 October 2018 – View of Offham Road / A20 junction traffic build up from M20 accident



Photo: 4 October 2018 - A20 / Roughetts Road congestion causing two hour + delay

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Photo: 4 October 2018 – View of M20 gridlock from Roughetts Road overbridge. Disruption causes congestion on A20 & surrounding roads

32. A recent article published on the front-page of The Times, 19 September 2018 - "Living in a polluted area increases the risk of dementia by up to 40 per cent, the first British study of its kind has found. Polluted air is known to cause lung and heart problems as tiny soot particles and chemicals such as nitrogen dioxide (NO₂) pass deep into the body. Research is also increasingly linking traffic fumes to thinking problems. Last year a Canadian study of 2.2 million people concluded that those who lived continuously near a busy road were 12 per cent more likely to get dementia. Professor Frank Kelly, of King's College London, senior author of the study said it was "very likely that high air pollution alone does not cause dementia but rather it increases the risk of an individual developing it".

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Photo: February 2018 – Local children created a banner using their own initiative to display their disapproval to the proposal as it is their future

CONCLUSION

The Ryarsh Protection Group appreciate Kent County Council's obligation to provide for a 'need for sand' within the local plan. We urge KCC to seek sites away from homes, schools and public buildings with reduced impact on residents and businesses.

Ryarsh and its neighbouring areas support an incredible community, which over the years has embraced significant change; most recently through new developments in Ryarsh Park, Leybourne Chase and the M20.

The cumulative impact of previous works has seen a disproportionate burden placed on the community. The proposed location of the M8 quarry in the immediate vicinity of homes, schools and public buildings would have a serious and detrimental effect on the everyday

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lives of residents and visitors, impacting their health and wellbeing. As Professor Dame Sally Davies, England's Chief Medical Officer, highlighted in her report of March 2018 "People are being exposed to a daily cocktail of pollution that may be having a significant impact on their health".

The project would further destroy the openness of the landscape, in close proximity to the Kent Downs, Area of Outstanding Natural Beauty. Access to this amenity, including public rights of way, would be removed and lost forever.

We respectfully request that decision makers within Kent County Council consider the enormous, negative effect this project will have on our village and surrounding communities whilst noting the universal condemnation our residents have submitted in objection to this proposal.

October 2018



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Appendix 4 – Natural England's Advice to KCC - Lydd Quarry (M2)

Date: 10 October 2018 Our ref: DAS/2340/255496

Dear Alice Short

Discretionary Advice Service (Charged Advice) Contract reference: 3890 Development proposal and location: Extension of Lydd Quarry, Lydd, Kent

Thank you for seeking advice under Natural England's Discretionary Advice Service for the above proposal. Kent County Council has sought advice on:

- Advice in relation to impacts and mitigation measures that may result from the proposed allocation of Lydd Quarry within the partial review of the Kent Minerals and Waste Plan to the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Wetland of International Importance under the Ramsar Convention (Ramsar Site)
- In addition, during the meeting, it was agreed that this advice note would also include initial advice on the scope of the Appropriate Assessment to accompany the Minerals Plan submission.

This advice is provided in accordance with the Quotation dated 15 August 2018 which was signed on the 10 September 2018. The advice within this letter is based upon the following:

- Meeting with Alice Short and Bryan Geake (Kent County Council), Ian Blake (BPP Consulting), Rachel Barker (Ecus Ltd), Jo Dear and Sean Hanna (Natural England) on the 19 September 2018
- Preliminary Assessment of Potential Hydrogeological and Hydrological Impacts Report (prepared by SLR dated September 2018)
- An outline written scheme of investigation for a programme of geoarchaeological and geomorphological work prior to and during quarry operations at Lydd Quarry, Kent (prepared by Archaeology South East dated September 2018)
- Email from Rachel Barker (Ecus Ltd dated 20 September 2018)
- Email from Bryan Geake of Kent County Council dated 25 September 2018

Impacts to the designated sites

I understand from Bryan Geake's email dated 25 September that the Council has a 7.8 year landbank of sand and shingle which exceeds the seven year minimum required by the National Planning Policy Framework (NPPF). This email also highlighted that in addition to this 7.8 year supply, there are 'others [sites] (Lydd being one of them) in the pipeline as potentially acceptable sites'.

Paragraph 204(f) of the NPPF requires minerals plans to:

'set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality'

In addition, Paragraph 205(b) of the NPPF states minerals authorities when considering applications should

'ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality'

The NPPF also states in Paragraph 175 that

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused:
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest'

The Spatial Vision for Minerals Planning in Kent detailed within the adopted Kent Minerals and Waste Plan 2013-30 states that:

'Throughout the plan period 2013-2030, minerals and waste development will:... Embrace the naturally and historically rich and sensitive environment of the plan area and ensure that it is conserved and enhanced for future generations to enjoy.'

The adopted Plan also states that:

'Planning for minerals in Kent will: ...

Facilitate the processing and use of secondary and recycled aggregates and become less reliant on land-won construction aggregates.'

As we discussed during our meeting, the extraction of minerals will result in the direct loss of the geomorphological interest from this area of the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest. Ditch and other wetland habitats from within the SSSI, SPA and Ramsar Site are also likely to be directly impacted as a result of this proposed minerals allocation (although understandably the detailed working proposals have yet to be finalised so the full extent of the impacts is not yet known). In addition to these direct impacts, based upon the best currently available information, there are potential indirect impacts to the wetland habitats surrounding the proposed allocation site from changes to the hydrology (including saline incursion), water quality and availability together with loss of supporting land for species associated with the SPA and Ramsar Site and the issue of disturbance are also likely to result from the proposal.

Given the significant direct and indirect impacts that this allocation would have for the designated sites, the Council needs to undertake a full and independent consideration of whether there are alternative sites or sources of material which will avoid or result in lesser environmental effects. As mentioned above the Council have confirmed that there are other sites in the pipeline in addition to Lydd Quarry, yet, no further details have been provided as to whether these are also being progressed or whether these would provide sufficient mineral resource for the lifespan of the Plan. I note that the Sustainability Appraisal accompanying the adopted Minerals and Waste Plan confirms in Section 10.1.1 that 'There is a widespread availability of alternatives to sharp sand and gravel in Kent including marine dredged aggregates and secondary/recycled aggregates' suggesting that the allocation of Lydd Quarry is not necessary to maintain the mineral landbank; a

position that appears to also be supported in the email from Bryan Geake dated 25 September 2018.

The proposed allocation of Lydd Quarry would appear to be contrary to the NPPF since the Council's own documents confirm there are alternative sources to meet the demand. The allocation would also appear contrary to Policy CSM1 of the adopted Minerals and Waste Plan since Paragraph 177 of the NPPF confirms that 'the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.' Policy CSM2 of the adopted plan also confirms that alternative sources will be able to meet the demand by stating that if additional sites are not brought forward 'Demand will instead be met from other sources, principally a combination of recycled and secondary aggregates, landings of MDA, blended materials and imports of crushed rock through wharves and railheads. The actual proportions will be decided by the market'.

During our recent meeting, you sought comments from Natural England on the report prepared by the site promoter, Brett Aggregates, on the needs and alternatives to the Lydd site being promoted. As Jo and I explained during the meeting, we consider the Council should undertake its own independent, impartial and comprehensive assessment of alternative sources of minerals as part of the Minerals Plan review and we would be pleased to provide advice on this once it is available. It appears from the information within the Sustainability Appraisal for the adopted Plan that much of this information may already be available. This assessment should include alternative land based sites and alternative sources such as recycled material and marine won material (in accordance with the approach detailed within Policy CSM2 of the adopted Plan). This assessment should include landscape, nature conservation and geological conservation interests in addition to the socio-economic impacts. Without such an assessment, the Minerals Plan may be unsound if it is not in accordance with the NPPF.

Mitigation measures

During our meeting, and the subsequent email from Bryan Geake of the 25 September, we discussed the 'mitigation' measures suggested by the site promoter for the geomorphological interest within the SSSI at Lydd Quarry. Given the permanent direct loss of the buried (and in part surface) geomorphology, the proposed 'mitigation' in the form of an investigation of deposits prior to extraction to me does not appear to be mitigation since it does not reduce the severity or impact of the mineral removal, it merely provides a limited record of the deposits and prevents any future study of the area.

The proposed geomorphological survey detailed within the outline written scheme of investigation appears similar to the approach undertaken for the previous extraction of minerals at Lydd Quarry. However, as Jo and I explained during our meeting, these previous phases had extant permission at the time the SSSI was notified. This current proposal does not benefit from any permission, allocation or safeguarding and as such the implications of the site allocation need to be fully considered in light of the impacts to the designated sites and the requirements of the NPPF. This geomorphological investigation proposed as 'mitigation' should very much be considered as a last option once all alternative sources of securing the mineral need have been fully exhausted in accordance with the 'avoid, mitigate, compensate' hierarchy of the NPPF and Policy CSM2 of the

¹ http://www.kent.gov.uk/ data/assets/pdf file/0016/15415/Kent-Minerals-and-Waste-Plan-2013-30-Sustainability-Appraisal.pdf

adopted Minerals and Waste Plan. Should the Council, having undertaken the assessment of alternative sources of material (and also undertaken its appropriate assessment in relation to the SAC, SPA and Ramsar Site), allocate the site and this is confirmed by the Plan Inspector, then it is likely Natural England would expect a detailed 'rescue and record' strategy to be secured. The detail of this would need to be agreed ahead of the mineral works commencing rather than at this

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stage as advances in technology may provide new opportunities that are not currently available.

Notwithstanding the above, I would advise that the 'mitigation strategy' for the geomorphological interest within the SSSI should not be considered as a justification for allocating Lydd Quarry for mineral extraction when the Council's own documents supporting the adopted Minerals and Waste Plan and more recently the email from Bryan Geake confirm that there are alternative sources which avoid the direct impacts to the SSSI.

In addition to the concerns regarding the loss of the nationally important geomorphology from this proposed site, based upon the currently available information significant ecological impacts to the designated site are also likely to result. Such impacts may result from:

Direct loss of habitat from the SPA and Ramsar Site from the allocations around Lydd town
Changes to the hydrology of the wetlands within the SSSI, SPA and Ramsar Site as a resul-
of changes in land form and/or dewatering activities which could have implications for the
availability of water within the ditches and other waterbodies, including low lying ground
prone to flooding in winter within the designated sites
Changes to the salinity of water bodies as a result of altered hydrological regimes
Impacts to species associated with the SSSI, SAC, SPA and Ramsar Site as a result of
direct habitat loss, changes to hydrology and salinity
Direct and indirect impacts to land supporting species associated with the SPA and Ramsar
Site which are out with the boundary of the sites (often referred to as supporting habitat or
functionally linked land)

Scope of the appropriate assessment

Following our meeting on the 19 September 2018, Rachel Barker kindly sent through a proposed scope of the appropriate assessment to accompany the formal minerals plan consultation. Given the potential for direct and indirect impacts to the SPA, SAC and Ramsar Site the allocation will result in a likely significant effect and as such an appropriate assessment of the plan will be required. In my opinion, the scope of the broad scope of appropriate assessment proposed by Ecus Ltd in their email of the 20 September appears to be acceptable. I would however recommend that additional considerations should also be scoped in - for ease I have copied the scope recommended

by Ecus Ltd below and included my suggested additions in italics.

Descrip	tion of designated sites screened in for LSE as a result of Lydd Quarry	and Allens	Bank:
	Dungeness, Romney Marsh and Rye Bay Special Protection Area (SP	A) and Wetl	and of
	International Importance under the Ramsar Convention (Ramsar Site)	•	

Dungeness Special Area of Conservation (SAC)

Description of proposed/likely activities at Lydd Quarry and Allens Bank:

]	Tonnage and area (m ²) of extraction and likely habitats at these areas (link to habitats and species below)
	De-watering process and footprint (scale, timing and duration)
	Wet-working process and footprint (scale, timing and duration)
	Access to and from the Areas and likely number of movements
	Lighting (if any)
	Anticipated noise levels
	Description of characteristics of any other existing/proposed activities that could result in incombination (cumulative) effects on the designated sites (e.g. Little Cheyney Court windfarm). I would also recommend that plans and projects that the Environment Agency are implementing should be considered along with the expansion of Lydd Airport (which has been consented but not implemented) as part of the in-combination assessment.

Additional activities that I would recommend are considered as part of the assessment are:

Impacts from any additional infrastructure requirements to facilitate the minerals extraction;

for example additional or modified haul routes, discharge pipelines and conveyor belts Site decommissioning and restoration
Information about the features of the designated sites: Baseline ecology (habitats and species) recorded at and surrounding Lydd Quarry and Allens Bank Areas (including designated features of prostrate broom and blackthorn at Dungeness SAC) Key attributes of these habitats and species Structure, function and supporting processes of habitats (including those which qualifying species rely on) Vulnerability/sensitivity of features and any seasonal influences (link to below if necessary)
 Description of potential impacts: Direct habitat loss - I would advise this should include habitat within the SPA and Ramsar Site and land which SPA and Ramsar Site species rely on for feeding and roosting which may be outwith the designated site boundaries (often referred to as supporting habitat or functionally linked land) Direct and indirect habitat changes (e.g. as a result of hydrological, salinity and geological changes along with habitat connectivity/severance impacts.) Disturbance (visual/noise) to species Barrier to species movement Introduction of invasive non-native species Air and water pollution Implications of the above habitat loss and alterations for all of the species of interest within the SPA, SAC and Ramsar Site including birds, aquatic plants and invertebrates, prostrate broom, blackthorn and water voles
Description of possible mitigation measures and how these will be implemented and monitored: E.g. details of the avoidance measures and consideration of alternative sources of securing the County's mineral needs such as alternative sites or off-shore resources. E.g. wet working on all areas E.g. discharging water to lakes to retain water levels E.g. screens around works to minimise disturbance E.g. Restrictions to working times – dawn/dusk, seasonal restrictions on working, ensuring water levels are maintained across the marsh throughout the working

Other advice

There are also other possible impacts resulting from this proposal that you should consider when assessing the implications of this allocation on the natural environment, in accordance with the NPPF and Policy CSM1 of the adopted Minerals and Waste Plan. The proposal may have implications for local landscape along with protected and/or priority species and we recommend you consult your in-house specialists in relation to the potential impacts that may arise from the proposed site allocation at Lydd Quarry.

For clarification of any points in this letter, please contact Sean Hanna on 0208 0266 064 or by email to sean.hanna@naturalengland.org.uk. This letter concludes Natural England's Advice within the Quotation and Agreement dated 10 September 2018.

Me advice provided in this letter has been through Natural England's Quality Assurance process

The advice provided within the Discretionary Advice Service is the professional advice of the Natural England adviser named below. It is the best advice that can be given based on the information provided so far. Its quality and detail is dependent upon the quality and depth of the information which has been provided. It does not constitute a statutory response or decision, which

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Yours sincerely

Sean Hanna

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<u>Appendix 5 - Alternative Supply of Aggregates and Socioeconomic Considerations – Lydd Quarry (M2)</u>

Alternative Supplies

Natural England (see Appendix 1 - letter dated 10th October ref. DAS/2340/255496) have raised the issue of a potential adverse impact (including direct and indirect in type) on the SPA/Ramsar, from loss of habitat (parcel 19) and essentially hydrological impacts. This requires the County Council (as a competent body) to consider alternatives to the landwon aggregate supply as part of the overall AA process, in accordance with the Habitat Regulations (stage 3: Habitat Regulations Assessment Handbook).

The matter was discussed with the site promoter and in response a report was submitted that has, from the perspective of the promoter, examined the potential for alternatives to further landwon extraction of aggregates at Lydd Quarry and Allens Bank. The report, entitled 'An examination of the viability of meeting the demand for Lydd sharp sand and gravel from alternative sources' was prepared by Davies Planning in September 2018. It addresses the matter by covering the following areas:

- Current activities at Lydd Quarry, the nature of the aggregate deposit and other mineral products
- Other landwon resources as alternatives to continued Lydd production
- Potential for recycled aggregates to substitute landwon aggregate production at Lydd
- Potential for marine dredged aggregate to be a sustainable alternative source of supply utilising Kent, East Sussex and West Sussex importation points (wharves) and distribution (railheads and road network)
- Environmental and economic implications of using marine dredged materials
- Socioeconomic benefits of the continuation of quarrying operations into the promoted Option site Lydd Quarry and Allens bank (M2)

In light of the above points, the report concludes that though there is the alternative of marine dredged materials (given that further landwon resources are in general decline in Kent and elsewhere in the South East). However, the environmental impact of using the poorly distributed importation (wharf) points would have a unacceptable impact upon the economics of current supply (costs would increase to the end user); and that the increased carbon loading effect of having to transport the equivalent amount of material over greater distances would have a detrimental effect on the sustainability of supply. Also, the report pointed out that the site produces a number of minerals and mineral related products that are both increasingly scarce (the sharp sands and gravel that can be used in high specification concrete manufacture and beach replenishment at Dungeness) and that are unique to Lydd (brick mould facing sand and grinding cobbles).

The availability of a suitable landwon alternative resource to the Lydd material in the South East appears to be in decline. This is evidenced by the published Local Aggregate Assessment reports available from the web sites of the respective Mineral Planning Authorities in the region (as collated by the annual report produced by SEEAWP for the Ministry of Housing, Communities & Local Government (see link https://www.gov.uk/government/collections/aggregates-working-parties-monitoring-reports). The landwon alternative to continued Lydd extraction to maintain a steady and adequate supply may be unavailable. This may particularly be the case for the high quality 'flint' sands and gravel that have been the subject of extensive past mineral extraction operations in Kent's

principle river valleys. The upper Medway sandstone sand and gravels are deposits that are mineralogically distinct from the 'flint' type (such as the Taplow Formation in the River Darent valley) and though they may still be generally available as potential reserves, they are characterised as lower grade materials (being composed of Chalcedony and being angular to sub-angular in shape) and of less importance given their more restricted application in construction product specification. Although, it should be noted that the importance of the two types are not distinguished in the Kent Minerals and Waste Local Plan in Policy CSM 2.

With regard to the available marine resources, it would appear that the two materials (land-won storm beach sand and gravel and marine dredged sand and gravel) are essentially analogous, though it is possible that there are variations between materials from an ancient barrier (storm) beach shingle ridge complex (the promoted site material) and material from the marine sedimentary basin of the East English Channel and North Sea areas in terms of exact characteristics. Though this is not explored by the report. The materials are also in relative abundance, the Crown Estates stated in 2012 (to the then Mineral Sites Plan, Preferred Options Consultation May 2012) the following:

- Over 900 million tonnes of marine sand and gravel (aggregate) has been dredged from
 offshore seabed over the last 50 years and at least 1,250 million tonnes is available for
 sustainable supply of construction aggregate over the next 50 years and beyond. Currently
 marine sand and gravel supply some 20% of the county's demand.
- The marine aggregate resource available in the East Coast, Thames Estuary and East English Channel areas and which are used to supply Kent wharves is 994 million tonnes of which 31.25 million tonnes is permitted for extraction per annum. Kent wharves only received some 1.3 million tonnes (4.2% of total permitted per annum) in 2010 but increased in 2011 with 1.55 million tonnes (5%). There is therefore a long term viable and sustainable supply of marine dredged aggregate both for construction uses and for direct beach nourishment by vessel delivery.
- The current rate of extraction by all companies to all marine aggregate wharves in the UK and on the European mainland is some 45% of the quantities permitted per annum thus reinforcing the sustainability and long term viability and requirement of marine aggregate wharves in Kent.

Kent's wharves have 7.30mtpa overall importation capacity that is not being fully utilised (see published LAA2017 (see page 26, *Table 12: Total sales and Estimated Productive Capacity, 2016 (Million tonnes, Mt)* [to be updated by LAA2018]) with some 58% capacity remaining to be utilised. The Davies Planning report estimates that, given the poor distribution of wharves in Kent (significantly in the lower Thames reaches at Dartford, Gravesham and in Medway and elsewhere [e.g. Folkestone, Ridham and Whitstable]) and in East Sussex at Rye (limited capacity) Shoreham and Newhaven (non-operational aggregate terminal), for the same quantity of material currently being supplied to the Lydd market, wharf imported material substitution would result in an additional average of 30 HGV miles per tonne of material transported.

This would result in an additional 13-17,000 tonnes of carbon dioxide over the life of the promoted Lydd Quarry and Allen's Bank Option site. Also, additional costs (£150.00 per tonne) to the end user would be incurred due to the increased transportation. It is also contended that this situation would not be relieved by increased use of Kent's aggregate railheads as these are again limited in number, of low capacity and again poorly distributed overall (notable exception of Sevington at Ashford, though this is considered now unavailable for aggregate importation due to recent planning permission for Network Rail for rail track ballast importation). However, these matters have to be weighed against the need to satisfy the Appropriate Assessment tests of the consideration of the

availability of alternatives as set out in the Habitats Regulations Assessments Handbook; Section c.13 Alternative solutions, Part 10 states:

The alternative solutions should be financially, legally and technically feasible. An alternative should not be ruled out simply because it would incur greater inconvenience or cost. However, there will come a point where an alternative is so very expensive or technically or legally difficult, that it would be unreasonable to consider it a feasible alternative solution.

In terms of the assessment of alternatives, the materials that the promoter is claiming to be important are:

- sand and gravel,
- a specialist brick making sand and
- large cobbles stones.

The cobble stones are purportedly used as a grinding media and specialised construction projects are found both in marine deposits and in other localities extracting Storm Beach materials. They form some 1-2% of the overall deposit and are a marginal material in the commercial sense. Moreover, are a material that is an industrial, and not an aggregate mineral that requires to have landbanks maintained by site allocation in the Kent Mineral Sites Plan. Therefore, the consideration of alternatives is not relevant in this instance.

The specialist sand mineral described as unique to Lydd, is used in brick manufacture as a facing sand and does appear to be an important material. It reportedly has been used since the 1950's from the locality and is of a type that is not apparently readily substituted. However, while the Lydd deposit sands may be a source of suitable facing sand used in brick making, this is an industrial mineral application and thus not an aggregate mineral for which allocations in the Mineral Sites Plan are required. The consideration of alternatives is therefore not relevant in this instance.

The bulk of the resource available in the site as promoted are a sand and gravel aggregate suitable for high specification concrete production. Alternative supply is available in the form of other high quality 'flint' sands and gravel materials from the land. This is opposed to river terrace sand and gravel that often are more angular in shape, iron mineral stained, and have a lower tensile strength (given that they are mineralogically different than the 'flint' aggregates that have a purer quartz chemistry rather than a being Chalcedony in type, this being a mixture of two quartz polymorphs and are of lower strength). Making the material less suitable for high specification concrete production. The land based 'flint' sands and gravels are now, as has been stated above, of limited occurrence given the significant extraction of past decades. The River Darent valley in North Kent may be the last source of material that is comparable to the land-based Lydd sands and gravels.

The main alternative source of material found in marine sands and gravels that are present in significant quantity on the sea floor of the East English Channel and North Sea. The Crown Estate are responsible for licensing extraction from the sea bed in these areas and have stated "1,250 million tonnes is available for sustainable supply of construction aggregate over the next 50 years and beyond". Clearly, the materials are available as an alternative source of supply to meet objectively identified needs.

Sourcing increased importation into the Lydd market area (reportedly up to Bexhill in the west, Canterbury in the north and Dover in the east) would have to incur an average of another 30 HGV road miles per tonne of aggregate it is stated, due to the poor distribution of wharves in Kent and East Sussex in relation to the Lydd market area. This is expected to load the environment with

between 13-17,000 tonnes of carbon dioxide and increase costs by as much as £150.00 per 21 tonne delivered load. The contention being that though an alternative supply exists it is not a sustainable or economically viable alternative.

It is recognised that wharves and railhead importation is not evenly distributed around the county and also are not equal in their suitability and capacity (railheads) to take up the demand increases. Increased importation via the significant new facility at Newhaven (once access matters are addressed) and potentially from Kent's northerly situated wharves would cause effects as reportedly outlined by the promotor of the site. Though the adopted policy of the Kent Minerals and Waste Local Plan 2013-30 recognises that future land-won supply will not address all the identified need over the Plan period, and thus it is established in policy that the increased importation is part of Kent's future sustainable plan to maintain a steady and adequate supply of aggregates.

The issue with regard to the impacts (direct and indirect) on the SPA is that they remain essentially uncertain. The Habitat Regulations make it clear that if there are alternative solutions that would have a lesser effect or avoid an adverse effect on the integrity of the designated site, then that alternative should be pursued. Clearly, there is an alternative to the continuation of the Lydd supply of high-quality aggregates that essentially meets the test, as set out in the Habitats Regulations Assessments Handbook, Section c.13 Alternative solutions, Part 10:

The alternative solutions should be financially, legally and technically feasible. An alternative should not be ruled out simply because it would incur greater inconvenience or cost. However, there will come a point where an alternative is so very expensive or technically or legally difficult, that it would be unreasonable to consider it a feasible alternative solution.

The increased use of wharf capacity (that is lawfully available) can be achieved without any recourse to any tests of legality or technical assessment. With only around some 42% of the operating capacity of Kent wharves being taken up demonstrates that there is ample head room for expansion, to address the potential loss of the landwon Lydd produced material with a suitable alternative marine aggregate material. The impact on the wider environment (increased carbon loading) from increased use of importation is an understood position reflected in adopted Policy CSM 2 of the Kent Minerals and Waste Local Plan 2013-30. This policy makes clear that landwon resources are to be provided for, while resources allow. After which, importation substitution would increasingly occur. This position has been subject to Sustainability Appraisal and Independent Examination and has been found sound in Policy CSM 2. The increased costs associated with increased transportation are an inevitable consequence of this position, given established markets and the uneven distribution of importation points (wharves and railheads). Therefore, there is not an imperative need to allocate the site in accordance with Policy CSM 2 Supply of Land-won Minerals in Kent of the Kent Minerals and Waste Local Plan 2013-30.

Socio-economic benefits

In support of the allocation the promoter submitted a report¹⁸ setting out the socio-economic benefits of continued working of aggregates from Lydd and Allens Bank. Consideration of this matter is undertaken in the context of NPPF Part 6 section 8 that states:

'Planning policies and 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.

¹⁸ Hatch Regeneris report of August 2018

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.'

Furthermore, NPPF policy (paragraph 175) on the protection of SSSIs states (with emphasis):

"development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where **the benefits of the development in the location proposed** clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;"

Therefore, the economic potential of the site has some bearing on its acceptability for allocation. The socio-economic benefits of the site in terms of its gross value addition (GVA) potential to the wider Lydd area have been assessed by engaged consultants (Hatch Regeneris). Their submitted report examines the headline economic benefits of the site by comparing the current GVA value to the locality of the site up to the end of the current reserve life (2 years) and projecting on until 2034, to coincide with the life of the extension area currently being promoted.

The model employed (by Hatch Regeneris) uses the national median wage of £28.8k (ONS data) and then uses a 55% multiplier on that wage level to create a GVA figure of £52.6k per employee that benefits the local economy. This concludes that the current reserves (being worked in East Sussex) will give a £2.8 million GVA to the overall locality. If the Kent promoted Option site (parcels 16-23) were to come forward, the effect would be a GVA of £44.8 million over 15 years to 2034.

The use of ONS statistics to determine local wages are not considered to be very representative of wages in the area. A breakdown of the current jobs employed (as given by the promoter both direct and indirect) and applying comparable age rates found in job advertisements as set out in the table below shows that the site produces an average (not median) wage of around about the £23.8k mark.

Jobs type Lydd Quarry	FTE (Full Time Equivalent) Posts	Salary in Pounds per annum
Manager	1	50K
Foreman	1	30K
Weighbridge clerk	1	15K
Fixed and mobile plan operatives	5	5x20K=100K
Contract earthmoving	1	20K
Maintenance	1	30K
Mechanical and electrical maintenance	1	30K
Company HGV divers	7	7x26K=182K

Contracted HGV drivers	2	2x26K=52K
Customer HGV drivers	2	2x26K=52K
Sub-total	22	531K
Ready-mix concrete Production		
Plant operative	1	25K
Truck drivers	2	2x26K=52K
Sub-total	3	77K
Aggregate Bagging Operation		
Bagging operatives	11	11x18K=180K
HGV drivers	8	8x26K=208K
Contracted HGV drivers	7	7x26K=182K
Customer HGV drivers	3	3x26K=78K
Sub-Total	29	648K
Total FTE employment	54	1286K divided 54 FTE gives 23.8K average salary

Using the consultant's £55% GVA multiple methodology this gives the following result;

GVA Based on Wages at 55%

	GB	Folkestone and Hythe
Annual by FTE	£52,217	£43,273
Annual at 54FTE	£2,819,742.55	£2,336,727.27
2 Year NPV at 3.5% DR	£5,356,649	£4,439,067
16 Year NPV at 3.5% DR	£34,102,296	£28,260.653

The adjusted GVA to the wider economy is considered to be more in the region of £28.3 million if the site extension areas, as promoted, were to gain planning permission and be implemented successfully. Not the £44.8 million as suggested by the Hatch Regeneris report. This also analysis did not look at the wider economy of the Folkestone and Hythe District in terms of its value to that economy. If this is done, the following becomes apparent:

- Folkestone and Hythe District has 48,000 jobs (includes self-employed and armed forces) 36,000 employed jobs 24,000 of which are full time
- 54 jobs as a percentage of just the full time (24k) available jobs is 0.225%, or lower if you compare to employed jobs at 0.15% and even lower when compared to all jobs.

Based on the Hatch Regeneris methodology for calculating GVA, every job produces the same, no matter the industry, so the % of GVA would be the same as the jobs. Giving the following tabulated data.

Annual GVA Folkestone and Hythe	
36,000 jobs	£1,557,818,182
54 additional jobs FTE	£2,336,727
As a %	0.15%

(based on £23,800 annual salary per FTE)

The 54 FTE direct and indirect jobs that would be supported by the site is equivalent to approximately 0.15% of the average GVA in the Folkestone and Hythe District. The data does not give a Lydd Town GVA figure as ONS employment data to this local level is unavailable.



Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30

Pre-Submission Draft

- Proposed modifications to certain policies relating to waste management:
 - Policies CSW 4, CSW 5, CSW 6, CSW 7, CSW 8 (Non-hazardous waste)
 - o Policy CSW 12 (Hazardous waste)
 - Policy CSW 14 (Disposal of Dredgings)
- Proposed modifications to certain policies relating to landwon minerals and minerals and waste management infrastructure safeguarding:
 - Policy DM 7 (Safeguarding Mineral Resources)
 - Policy DM 8 (Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities)

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1.0 Introduction

The County Council is partially reviewing the adopted Kent Minerals and Waste Local Plan 2013-30 (the Plan). The Plan sets out the strategy for the sustainable management of Kent's waste, the delivery of minerals where a need exists and is the primary element of the development plan against which planning applications and appeals for minerals and waste development in Kent will be determined.

Modifications are proposed in the following areas:

- Waste management:
 - The strategy for provision of future waste management capacity
 - The identification of site allocations for waste management facilities
- The approach to safeguarding mineral resources and waste management and minerals supply infrastructure.

The context to the proposed modifications is explained below and the proposed changes to the text of the Plan are also included.

2.0 Proposed modifications to certain policies relating to waste management

2.1 Background

The adopted Plan identifies a shortfall in capacity of the following types over the Plan period (to 2030):

- Waste recovery capacity energy from waste and organic waste treatment;
- Hazardous waste (due to the identified need for additional capacity to allow for the continued landfilling of asbestos)
- Disposal of Dredgings.

As a consequence, policies CSW7, CSW8, CSW 12 and CSW 14 state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls.

A review¹ of the future needs for waste management facilities in Kent has been undertaken and this has concluded that there is now no need for the development of this additional capacity. This is for the following reasons:

- Energy recovery capacity: the additional capacity at Kemsley Sustainable Energy Plant (SEP) is now confirmed.
- Hazardous waste: Due to the lack of need for additional capacity to allow for the continued landfilling of projected arisings of asbestos from Kent within Kent.
- Disposal of Dredgings: No clear need identified by Port of London Authority (PLA) (the responsible navigation authority) for a specific site.

In addition, while there remains an identified need for organic waste treatment capacity, it is considered that adopted policy in the MWLP is sufficiently permissive and positive enough for applications to be encouraged to come forward without the allocation of specific sites. It should also be noted that when recycling and composting are considered together there is no predicted shortfall in capacity.

The review and modification of the policies mentioned above will ensure the development plan for Kent, insofar as policies relating to provision for waste management are concerned, is relevant and effective, reflecting changes in circumstances. This is consistent with paragraph 31 of the National Planning Policy Framework which states that:

"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."

An explanation of the proposed modifications is set out below.

2.1.1 Policy CSW 4: Strategy for Waste Management Capacity; Policy CSW 7: Waste Management for Non-hazardous Waste; and, Policy CSW 8
Other Recovery Facilities for Non-hazardous Waste

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¹ BPP Consulting Kent Waste Needs Assessment 2018 Specifically: Non Hazardous Waste Recovery Capacity Requirement, September 2018; Non Hazardous Waste Recycling/Composting Capacity Requirement, September 2018; and Hazardous Waste Needs Assessment, September 2018.

Policy CSW 7 sets out the requirements for the provision of new waste management capacity for non-hazardous waste. The policy is intended to increase the provision of waste management capacity for recovery while recognising the need to drive waste up the hierarchy².

The original Needs Assessment for waste management facilities (originally prepared in 2011 and partially updated in January 2012: *Addendum to the Needs Assessment Modelling Technical Report*) showed that there was, at the time, no lack of capacity for the preparation of non-hazardous waste for reuse or recycling during the whole of the plan period. However, the Needs Assessment showed a capacity gap emerging in 2024 for treating green and kitchen wastes and in order to rectify a perceived imbalance of capacity between recycling and composting Policy CSW 7 seeks to address that particular gap in provision. The policy identified (as a minimum) 64,000 tonnes per annum (tpa) requirement by 2031.

In addition, the Needs Assessment identified a projected shortfall in "other" recovery capacity of 562,000tpa by the end of the Plan period.

Policy CSW 7 includes the following future capacity requirements based on the Needs Assessment mentioned above:

Year	Maximum Additional Capacity Required (tpa)	Indication of Number of New facilities for Recovery Needed	Minimum Additional Treatment Capacity for Green and Kitchen Wastes (tpa)	Indication of Number of New Facilities needed for Treating Green and Kitchen Waste
2011	0	0	0	0
2016	375,000	1-2	20,000	1
2021	125,000	1	0	0
2026	62,500	1	20,000	1

² The 'waste hierarchy' is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The hierarchy gives top priority to waste prevention, followed by preparing for re- use, then recycling/composting, then other types of recovery (including energy recovery), and last of all disposal (e.g. landfill).

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2031	0	0	24,000	1
Total	562,000	3-4	64,000	3

The recovery capacity requirement is expressed as a maximum, whereas the organic treatment capacity is a minimum; reflecting the relative positions of these methods of waste management in the Waste Hierarchy. That is to say it is preferable to process organic waste to produce compost, for example, than to burn it to produce heat/power. The use of organic waste to produce a gas via anaerobic digestion that may be used as a fuel is also considered preferable to its direct combustion.

In light of the position of recycling further up the Waste Hierarchy, the Plan does not restrict the amount of additional capacity for waste management for recycling or preparation of waste for reuse or recycling, nor does it suggest provision of the additional capacity of green and/or kitchen waste treatment facilities should occur in the later part of the Plan period since the sooner it is delivered, the greater the impact will be on reducing organic waste going to landfill, the most significant source of methane production.

The implementation of Policy CSW7 was intended to result in reducing the amount of non-hazardous waste from Kent going for disposal to landfill to less than 76,000 tpa by the end of the Plan period, and to also assist in husbanding existing non-hazardous landfill capacity in Kent to the end of the Plan period to provide management capacity for any non-hazardous waste that cannot be reused, recycled, composted or recovered.

On adoption of the Plan (in July 2016) the Policy CSW7 capacity requirements for additional recovery capacity were considered to be robust. However, calculation of the requirements had not taken into account the planning permission (granted in 2012) for a Sustainable Energy Plant taking waste as a fuel to produce energy including heat at Kemsley Fields Business Park due to the lack of certainty concerning its implementation at that time. However, it can now be stated that the project will be fully implemented with commissioning scheduled for 2019. Therefore, it is now appropriate for the capacity of the site (some 525,000 tpa) to be counted as part of the available waste recovery capacity of the Plan area. An update of the Needs Assessment using more current data and updated assessment methods (See separate BPP Consulting waste needs assessment reports³ and summary of key

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³ Note that these reports are updated versions of the reports published as part of the consultation on the draft Early Partial Review in late 2017/early 2018.

conclusions in Appendix 1) indicates that the shortfall of 562,500 tpa of non-hazardous waste management capacity included in Policy CSW7 is now highly unlikely to arise. In order to avoid overprovision of waste recovery capacity, which may discourage the development of recycling and composting capacity further up the waste hierarchy, it is proposed that policies CSW 7 and CSW 8 be modified to eliminate the stated waste recovery requirement to be planned for.

While Appendix 1 shows there remains a predicted shortfall in organic waste treatment capacity, when recycling and composting are considered together, there is no overall predicted shortfall in recycling and composting capacity.

The original calculation of recycling and composting capacity requirements presented in Policy CSW 7 was based on targets formulated In January 2012 using 2010/11 data⁴. The LACW targets were based on the aspiration of KCC in its role as Waste Disposal Authority (WDA) for Kent and the C&I targets were based on those in the South East Plan (adopted in 2009).

Since adoption of the KMWLP, the EU Circular Economy Package has been adopted and the UK Government has confirmed its intention to comply with the targets set within it regardless of the UK leaving the European Union. Therefore, the targets have been updated to reflect those set as follows:

- recycling target for municipal waste 55% by 2025 and 60% by 2030; and
- 10% limit of landfilling of municipal waste by 2035.

In addition, the progression to achieving LACW recycling targets has been scaled back (compared both to adopted Plan and the draft Partial Review document) to reflect the fact that the actual recycling rate achieved in 2015/16 was five percentage points lower than projected in the adopted KMWLP (46% rather than 51%), therefore the revised targets are more achievable (while remaining ambitious).

The differences between the targets in the adopted KMWLP and those proposed are presented in Tables 1 and 2 below.

Local Authority Collected Waste Targets

italicised values are historical actual values included for baseline purposes

· · ·
Milestone Year

⁴ Waste Management Statistical Basis for the Kent County Council Minerals and Waste Development Framework Addendum to the Needs Assessment Modelling Technical Report Needs Assessment 2011 Update January 2012

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		2015/16	2020/21	2025/26	2030/31
Recycling/	Adopted KMWLP	51.00%	55.00%	59.00%	62.00%
composting	Proposed	46.00%	50.00%	55.00%	60.00%
	Difference		-5.00%	-4.00%	-2.00%
	Adopted KMWLP	40.00%	38.00%	37.00%	35.00%
Remainder to Other Recovery⁵	Proposed	47.00%	48.00%	43.00%	38.00%
Necovery-	Difference		+10.00%	+6.00%	+3.00%
	Adopted KMWLP	9.00%	7.00%	4.00%	2.50%
Landfill	Proposed	6.00%	2.00%	2.00%	2.00%
	Difference (expressed in converse as difference is positive)		5.00%	2.00%	0.50%

Commercial & Industrial Waste Targets

	Milestone Year				
		2015/16	2020/21	2025/26	2030/31
5 " /	Adopted KMWLP	61.00%	63.00%	65.00%	65.00%
Recycling/ composting	Proposed	n/a	50.00%	55.00%	60.00%
Composing	Difference		-13.00%	-10.00%	-5.00%
	Adopted KMWLP	20.00%	21.00%	19.00%	19.00%
Remainder to Other Recovery ⁶	Proposed	n/a	35.00%	32.50%	30.00%
Recovery	Difference		+14.00%	+13.50%	+11.00%
	Adopted KMWLP	19.00%	16.00%	16.00%	16.00%
Landfill	Proposed	n/a	15.00%	12.50%	10.00%
24.74111	Difference (expressed in converse as difference is positive)		1.00%	3.50%	6.00%

The revised targets have been incorporated into Policy CSW4 to aid annual monitoring of the Plan (through the Annual Monitoring Report (AMR)) and identify whether shortfalls may exist; providing clear guidance to developers and the Authority on the need for proposals for additional capacity where it involves management through methods that fall below recycling, composting or reuse in the Waste Hierarchy.

2.1.2 Policy CSW 5 Strategic Site for Waste

⁵ This identifies the consequential predicted remaining management requirement assuming the other targets are met.

⁶ As footnote 5

Policy CSW 5 sets out the criteria to be applied to the assessment of any forthcoming application relating to the Strategic Site Allocation at Norwood Quarry. It is proposed to add a clause providing for assurances that the proposed site can be suitably restored in the event that the void space may no longer be used for management of air pollution control residues due to a possible change in government policy. Currently national policy allows landfilling of such waste under a special derogation from the Landfill Directive waste acceptance criteria requirements. This has been subject to review in the past and may change in future. In addition, it is proposed to delete the requirement for an assessment of alternative management methods given that significant tonnages are already being managed through other treatment routes.

2.1.3 Policy CSW 12: Identifying Sites for Hazardous Waste; Policy CSW 14 Disposal of Dredgings

Policies CSW 12 and CSW 14 are also to be modified since the need identified in the original Needs Assessment is no longer apparent. In particular a future need for additional landfill capacity to accommodate asbestos waste in Kent has not been identified given that the aspiration for maintaining net self sufficiency in hazardous waste management capacity overall will be met by the Plan's provision of additional hazardous waste landfill capacity (air pollution control residues) at Norwood Farm. A review of the need to accommodate predicted arisings of asbestos waste from Kent alone⁷ indicates that current disposal capacity will be sufficient for the Plan period. Nor has the need for the provision of a specific landfill for disposal of dredgings been confirmed by the main beneficiary of any such facility (the Port of London Authority).

⁷ BPP Consulting Waste Needs Assessment 2018

2.2 Proposed Modifications to Text of the Kent Minerals and Waste Local Plan Concerning Waste Management

In light of the changes to the assessment of waste capacity requirements as set out in the previous section, it is proposed that the text of the Kent Minerals and Waste Local Plan be modified as set out below.

Note that new text is shown in italics, bold, and underlined (*like this*) and deleted text is shown struck though (*like this*).

A clean copy of the proposed modifications is set out for information in Appendix 2

- **1.1.3** The specific sites for minerals and waste developments will be set out in the separate Kent Minerals and Waste Sites Plans. The site selection process for the final sites included in the <u>Minerals</u> Sites Plans will be based on the policies in the Kent MWLP.
- 1.2.2 The policies in this Plan replace the earlier versions of the saved Kent Minerals and Waste Local Plan policies. Appendix B lists the schedules of saved Kent Local Plan policies replaced, deleted or retained. Site specific policies from the saved Kent Minerals and Waste Local Plan policies will be retained until the Kent Minerals Sites Plan and the Kent Waste Sites Plan are adopted.

6 Delivery Strategy for Waste

[Policy CSW1 and para 6.1.1- 6.1.2 remain unchanged]

- 6.2 Policy CSW 2: Waste Hierarchy and Policy CSW 3: Waste Reduction
- **6.2.1** It is Government policy to break the link between economic growth and the environmental impact of waste by moving the management of waste up the Waste Hierarchy, as shown in Figure 18. (75)

Figure 18 Waste Hierarchy

- **6.2.2** The Kent MWLP mainly implements this policy through influence over waste and minerals developments. However, the Plan also includes a policy (Policy CSW 3) seeking to influence/reduce waste arising from all forms of development. The Kent MWLP forms part of the development plan, along with the district local plans, and is therefore relevant to the determination of planning applications for all forms of development in Kent.
- **6.2.3** In accordance with the Waste Hierarchy, the Plan gives priority to planning for waste management developments that prepare waste for re-use or recycling. <u>The</u> most recent assessment of waste management capacity requirements Needs

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Assessment for waste (76) shows that Kent's current recycling and processing facilities have sufficient capacity for the anticipated rate of usage with the exception of facilities for green and kitchen wastes. It should be appreciated that these calculations are based upon a rate of use that should only be regarded as a minimum, as the aspiration is to encourage more of the waste that is produced in Kent to be managed by methods at this tier of the hierarchy through this method of waste management.

- **6.2.4** Encouraging more waste to be managed via re-use or recycling will be achieved by enabling policies for the development of <u>additional</u> waste management <u>capacity</u>facilities for recycling and processing <u>including</u> through the following measures:
 - the identification in the Waste Sites Plan of all of the deliverable, sustainable sites for these forms of waste management that have been promoted for inclusion by landowners or the waste industry
 - a policy <u>presumption</u> to grant planning permission for redevelopment or extensions to <u>lawful</u> existing waste <u>management</u> facilities to enable more waste to be recycled or processed for re-use providing <u>the proposal is in accordance with the locational and development management policies in the Plan if the facility's capacity for the maximum annual tonnage of waste is not increased.</u>
- 6.2.5 The application of the Waste Hierarchy is a legal requirement under-the Waste (England and Wales) Regulations 2011. is most appropriate to producers of waste when assessing how to manage waste. The Kent MWLP has to plan for all forms of waste management in the Waste Hierarchy to make this possible. While It is anticipated that there will be a transition over time to forms of waste management at the higher end of the Waste Hierarchy, there will still be a need for disposal at the end of the plan period for difficult to treat wastes, or wastes such as asbestos for which there is no present alternative. The Kent MWLP addresses this transition by seeking to rapidly provide a more sustainable option for the mixed non-hazardous waste that is going to landfill by applying ambitious but achievable landfill diversion targets presented in Policy CSW 4 identifying sites for energy recovery. Due to other recovery being at the lower end of the Waste Hierarchy, the total amount of new energy recovery capacity to be permitted will be capped. It is envisaged that this method of waste management will become displaced as recycling and waste processing become more economically viable.

Footnote 76 Jacobs (January 2012) Addendum to the Needs Assessment Modelling Technical Report - Needs Assessment 2011 Update Consulting Waste Needs Assessment 2018.

[Policies CSW 2 and CSW 3 remain unchanged]

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Net Self-sufficiency and Waste Movements

- **6.3.1** Kent currently achieves net self-sufficiency in waste management facilities <u>capacity</u> for all waste streams. I.e. the annual capacity of the waste management facilities (excluding transfer) in Kent is sufficient to manage the <u>equivalent quantity</u> <u>of</u> waste <u>to that predicted to</u> aris<u>e</u> in Kent. The continued achievement of the <u>principle</u> of net self-sufficiency and <u>the management of ing</u> waste close to its source is a <u>are</u> key Strategic Objective<u>s</u> of the Kent MWLP, because it shows that Kent is not placing any unnecessary burden on other WPAs to manage its waste. <u>Net self sufficiency recognises that existing (and future) waste management capacity within Kent may not necessarily be for the exclusive management of Kent's waste. Proposals that would result in more waste being managed in Kent than is produced may be acceptable if it was demonstrated that these would result in waste produced in Kent being managed at a higher level of the waste <u>hierarchy</u>. <u>Achievement of n</u>Net self-sufficiency can be monitored on an annual basis and will provide an indicator as to whether the policies in the Plan need to be reviewed.</u>
- **6.3.2** In reality, different types of waste are managed at different types of facilities. To assess the future needs for waste facilities in Kent, net self-sufficiency has been studied for the individual waste streams of inert, non-inert (also called nonhazardous) and hazardous wastes. While Kent currently achieves net self-sufficiency for each of these wastes separately, new facilities this position will be monitored to ensure this will need to be developed for each of these waste streams if it is to remains the case net self-sufficient throughout the plan period. 6.3.3 The Kent AMR 11/12 (77) shows that there was a considerable movement of waste both into and out of Kent for management. In 2010, just over 1,000,000 tonnes of waste originating in Kent was managed outside Kent and facilities in Kent managed approximately 750,000 tonnes of waste that did not originate in Kent. The purpose in adopting the principle of net self-sufficiency is not to restrict the movement of waste as such restriction of waste catchment areas could have an adverse effect upon the viability of the development of new additional waste management capacityfacilities needed to provide additional capacity for Kent's waste arisings.

Provision for Waste From London

- **6.3.43** Specific provision in the calculations for new capacity required for non-hazardous waste going to landfill or EfW has been made for waste from London. The reason for this is twofold:
- 1. The evidence base prepared for the partially revoked SEP (the SEP and its evidence base are still relevant to the Plan and form part of its evidence base) shows a continuing need for the disposal of residual non-hazardous waste arising from London in the South East. The SEP quantified the amounts arising and apportioned the provision of capacity to be provided by each of the WPAs. In the absence of any more recent quantification of the amount of residual non-hazardous waste arising in

London that might come into Kent for management, the Plan uses a provision allowance based on the partially revoked SEP apportionment.

2. The major non-hazardous landfill site in Havering, east London, (78) which includes in its catchment area waste arising from the parts of London closest to Kent, is set to close by 2018 and could cause a potential influx of additional waste into Kent. If this is not taken into account, the increase in management of non-hazardous waste originating in London within waste facilities in Kent could have an adverse effect on the capacity of Kent's facilities to manage its own waste originating in the county.

that due to land constraints London's residual waste cannot all be managed within London itself and so, as a neighbouring waste planning authority, Kent County Council has some responsibility to make provision for an element of this waste. Historical data indicates the tonnage to be provided for is in the region of 35,000 tonnes per annum. It is also recognised that closure of Rainham Landfill in the London Borough of Havering in 2026 may result in the displacement of waste from Kent currently managed there. Therefore, an additional tonnage of 20,000 tpa has been planned for on a contingency basis. 6.3.5 The Plan's approach to non-hazardous waste originating in London differs from the approach set out in the partially revoked SEP as follows: The SEP's apportionment of London's waste was to be provided by the provision

of non-hazardous landfill. The Plan is instead making provision for London's non-hazardous waste through EfW capacity. (79)

The SEP required provision to be made in Kent for landfilling 158,880 tpa of London's non-hazardous waste for the period for 2006 to 2015. There is no evidence of this rate of London's waste being landfilled in Kent. The maximum quantity of London waste that has been deposited in Kent's landfills in recent years is 21,259 tpa. The Plan makes provision for 21,259 tpa to be disposed in either non-hazardous landfill or EfW in Kent.

The SEP anticipated a dramatic decrease in the amount of London non-hazardous waste being exported into the South East by 2016, due to the expectation that the only non-hazardous waste exported would be EfW residues. The Plan anticipates an increase in the amount of waste coming into Kent for disposal in 2018 since the non-hazardous landfill in Havering is expected to close by the end of 2017. For the period of 2017 to 2030, the Plan makes provision for 87,000 tpa of London non-hazardous waste being disposed in Kent at non-hazardous landfill and EfW facilities. This is the SEP figure for the period of 2016 to 2025 and is used in the Plan as there is no other up-to-date assessment of the amount of London's non-hazardous waste that might be exported to Kent for disposal.

78 The Veolia Rainham landfill in the Borough of Havering.

79 It is anticipated that London's non-hazardous waste might go to either Kent non-hazardous landfill or EfW, or both. No specific, additional provision is being made for new non-hazardous landfill as the provision of new EfW is expected to free up some capacity at existing landfill sites given that EfW is expected to be a more cost effective option.

6.3.64 For the plan period, An assessment has been made of the <u>current profile of management of the principal waste streams</u>. The targets applied reflect ambitious (but realistic) goals for moving waste up the hierarchy and seek to ensure that the maximum quantity of non hazardous waste is diverted from landfill.

new types of facilities that will be required in terms of broad categories of waste management facilities, such as landfill, recycling and composting, and other recovery, which roughly correspond to stages in the Waste Hierarchy. In this *Needs Assessment* for different categories of facilities has been based on the targets for recycling and recovery (and by deduction for landfill) as set out in the Kent JMWMS (80) and its *Refreshed Objectives and Policies*, (81) and the revised WFD. (82)

Policy CSW 4

Strategy for Waste Management Capacity

The strategy for waste management capacity in Kent is to provide sufficient waste management capacity to manage at least the equivalent of the waste arising in Kent plus some residual non-hazardous waste from London. As a minimum it is to achieve the targets <u>set out below</u> for recycling and composting <u>and other forms of recovery.</u>, reuse and landfill diversion identified in the Kent Joint Municipal Waste Management Strategy (as amended).

	Milestone Year					
	<u>2015/16</u> <u>2020/21</u> <u>2025/26</u> <u>2030/31</u>					
Local Authority Collected Waste						
Recycling/composting ⁸	<u>n/a</u>	<u>50%</u>	<u>55%</u>	<u>60%</u>		
Other Recovery	<u>n/a</u>	<u>48%</u>	<u>43%</u>	<u>38%</u>		
Remainder to Landfill	<u>n/a</u>	<u>2%</u>	<u>2%</u>	<u>2%</u>		
Commercial & Industrial Waste						
Recycling/composting9	<u>n/a</u>	<u>50%</u>	<u>55%</u>	<u>60%</u>		

⁸ This is taken to include organic waste (including green and kitchen waste) treatment by Anaerobic Digestion

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⁹ This is taken to include organic waste (including green and kitchen waste) treatment by Anaerobic Digestion

Other Recovery	<u>n/a</u>	<u>35%</u>	<u>32.5%</u>	<u>30%</u>			
Remainder to Landfill	<u>n/a</u>	<u>15%</u>	<u>12.5%</u>	<u>10%</u>			
Construction & Demolition Waste (Non Inert Only)							
<u>Recycling</u>	<u>n/a</u>	<u>12%</u>	<u>13%</u>	<u>14%</u>			
<u>Composting</u>	<u>n/a</u>	<u>1%</u>	<u>1%</u>	<u>1%</u>			
Other Recovery	<u>n/a</u>	<u>5%</u>	<u>5%</u>	<u>5%</u>			
Remainder to Landfill	<u>n/a</u>	<u>2%</u>	<u>1%</u>	<u>0.5%</u>			

It should be noted that the values shown for 'Remainder to Landfill' are not targets but are included to show the predicted requirement for landfill in light of the achievement of the targets to move waste up the hierarchy.

- 6.4 Policy CSW 5: Strategic Site for Waste
- **6.4.1** To meet the Kent MWLP objective of reducing the amount of waste being landfilled, the Plan is using policies to drive a major change in the way that waste is managed in Kent. To do this will require increasing numbers of facilities for recycling, composting and Anaerobic Digestion (AD) as well as additional facilities for EfW. Enabling the change in perception of waste from being something that has to be disposed to something that can be waste being used as a resource will be helped by the development of such additional capacity further up the hierarchy. This will need sufficient local capacity for the treatment or disposal of the residues arising from the existing and future EfW plants.
- **6.4.2** Kent has the benefit of a major EfW plant at Allington that features heavily in the Waste Management Unit (WMU) contracts for residual MSW. While this plant currently has spare capacity, additional EfW facilities will be required during the plan period to deal primarily with the volumes of C&I waste arising in Kent that are currently sent to landfill.
- 6.4.23 The landfill at Norwood Quarry on the Isle of Sheppey accommodates the hazardous flue ash residues from the Allington EfW facility that feature heavily in the Waste Management Unit (WMU) contracts for residual MSW, but it has limited consented void space remaining. To make provision for this waste for the duration of the Plan, it is considered essential that Kent has the capacity to deal with these residues an extension to Norwood Quarry is identified. Enabling the continued management of hazardous flue ash within Kent has the added benefit of contributing to achieving the continued net self-sufficiency in hazardous waste management capacity. (83)
- **6.4.4** Therefore, a matter fundamental to the central achievement of the Plan is the identification of a suitable location for the treatment or disposal of the hazardous waste residues within Kent. No site for the treatment of this waste was submitted to the County Council in response to the call for sites in 2010 and only one site was put

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forward for its disposal. The submission for hazardous waste disposal was for an extension to the existing facility at Norwood Quarry, which benefits from suitable geology for engineering a hazardous landfill. Norwood Quarry is also the only site put forward in the 2010 call for sites for clay extraction for engineering purposes, that would enable a continuation of supply in Kent and, thereby, the need to restore the land with waste.

- **6.4.35** There are no realistic alternatives to the disposal of the Allington EfW flue ash in landfill for the foreseeable future. While there is a risk that identifying the extension area at Norwood Quarry as a Strategic Site for Waste could hinder the development of alternative treatment solutions for the flue ash, there is a need to make provision for this waste stream.
- **6.4.**46 The proposed extension areas to Norwood Landfill are identified as the Strategic Site for Waste. The location of these extension areas is shown on Figure 19.

Policy CSW5

Strategic Site for Waste

The proposed extension areas for Norwood Quarry and Landfill Site, Isle of Sheppey are together identified as the Strategic Site for Waste in Kent. The site location is shown on Figure 19. Planning permission will not be granted for any other development other than mineral working with restoration through the landfilling of hazardous (flue) dust ash residues from Energy from Waste plants in Kent, unless it can be demonstrated that the equivalent capacity for treatment or disposal can be provided elsewhere in Kent.

Mineral working and restoration by hazardous landfill and any ancillary treatment plant at the Strategic Site for Waste will be permitted subject to meeting the requirements of the development plan and the following criteria:

- 1. <u>Demonstration that the site can be suitably restored in the event that landfilling of hazardous (flue) dust ash residues from Energy from Waste plants were to cease before completion of the final landform due to changes in treatment capacity and/or government policy that may result in the diversion of these wastes from landfill. an assessment has-been made that alternative treatment technologies for hazardous flue dust from Energy from Waste plants are not economically viable</u>
- 2. an air quality assessment is made of the impact of the proposed development and its associated traffic movements (84) on the Medway Estuary and Marshes Special Protection Area and the Swale Special Protection Area sites and if necessary mitigation measures are required through planning condition and/or planning obligation

- 3. the site and any associated land being restored to a high quality standard and appropriate after-use that accords with the local landscape character 4. Any proposal for this site would need to consider the requirements of other relevant polices of this Plan and in particular would need to consider any impacts on the A2500 Lower Road. Depending on the nature of any proposal it may be necessary for the developer to make a contribution to the improvement of this road.
- 6.5 Policy CSW 6: Location of Built Waste Management Facilities
- **6.5.1** The preference identified in response to earlier consultations during the formulation of the Plan was for a mix of new small and large sites for waste management. This mix gives flexibility and assists in balancing the benefits of proximity to waste arisings while enabling developers of large facilities to exploit economies of scale. National policy recognises that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant and this is particularly relevant when considering the possible sizing and location of facilities required to satisfy the strategic need identified in Policy CSW 7 any emerging need indicated by monitoring e.g. in the relevant AMR.
- **6.5.2** The location of waste sites in appropriate industrial estates was also the preference identified from the consultation. This has the benefit of using previously developed land and enabling waste uses to be located proximate to waste arisings. There is vacant *E*mployment land throughout Kent and its availability is monitored annually by KCC and the district and borough councils. (85) While vacancy rates of premises in industrial estates generally preclude identification of any particular unit, unless it is being promoted by an operator/landowner, whole industrial estates may be identified as suitable locations. It should be appreciated that all industrial estate locations may not be suitable for some types of waste uses, because of their limited size or close proximity to sensitive receptors or high land and rent costs.
- **6.5.3** There will still be a need for other locations for <u>C</u>ertain types of waste or waste management facilities, such as Construction, Demolition and Excavation (CDE) recycling facilities-that are often co-located on mineral sites for aggregates or landfills, which are usually found in rural areas. Also, in rural areas where either the non-processed waste arisings or the processed product can be of benefit to agricultural land (as is the case with compost and anaerobic digestion), the most proximate location for the waste management facility <u>will likely</u> be within the rural area.
- **6.5.4** Specific identification of sites for EfW plants will be made regardless of whether the sites are within an appropriate industrial estate because large sites are needed. The protection afforded through policy will prevent these sites from either being developed or partially developed by other uses.
- **6.5.54** The development of waste management facilities on previously developed land will be given preference over the development of greenfield sites. In particular,

the redevelopment of derelict or contaminated land may involve treatment of soil to facilitate the redevelopment. Also, redundant agricultural or forestry buildings may be suitable for waste uses where such uses are to be located within the rural areas of the county. Waste management facilities located in the Green Belt are generally regarded as inappropriate development. Developers proposing a waste management facility within the Green Belt shall demonstrate the proposed use complies with Green Belt policy (See Policy DM4).

- **6.5.56** The development of built waste management facilities on greenfield sites is not precluded. This is because the goal of achieving sustainable development will lead to new development which may incorporate facilities to recycle or process the waste produced on the site, or to generate energy for use on the site.
- **6.5.67** Existing mineral and waste management sites may offer good locations for siting certain waste management facilities <u>and for expansion to deliver further capacity to that which exists</u> because of their infrastructure and location. In such cases, the developer will need to demonstrate the benefits of co-location such as connectivity with the existing use of the site <u>while also demonstrating that any cumulative impact is acceptable</u>. For example, the co-location of CDE recycling (i.e. aggregate recycling) at an aggregate quarry that can enable the blending of recycled and virgin aggregates to increase the marketability of the product <u>or the addition of a facility that will move waste further up the hierarchy at an existing EfW site</u>.
- **6.5.8** In order to reinforce and maintain a network of facilities across the county (See Figure 16), the Waste Sites Plan will identify suitable development locations and give clear guidance on the type of facility that may be developed in such locations, based on this Plan's vision, strategic objectives and policies. The criteria in Policy CSW 6 will be taken into account when selecting and screening the suitability of sites for identification in the Waste Sites Plan.
- **6.5.79** Policy CSW 6 applies to all proposals for built waste management facilities. Sites identified for allocation in the Waste Sites Plan will be assessed for their suitability to accommodate certain types of waste management facility and therefore certain sites may only accommodate certain types of facility deemed appropriate to that location.

Policy CSW 6 Location of Built Waste Management Facilities

Planning permission will be granted for <u>proposals that</u> uses identified as appropriate to the sites allocated in the Waste Sites Plan to meet the need identified in Policy CSW 7 providing that such proposals:

 a) do not give rise to significant adverse impacts upon national and international designated sites, including Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), Special Areas of Conservation

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- (SAC), Special Protection Areas (SPAs), Ramsar sites, Ancient Monuments and registered Historic Parks and Gardens. (See Figures 4, 5 & 6).
- b) do not give rise to significant adverse impacts upon Local Wildlife Sites (LWS), Local Nature Reserves (LNR), Ancient Woodland, Air Quality Management Areas (AQMAs) and groundwater resources. (See Figures 7, 8, 10 & 15)
- c) are well located in relation to Kent's Key Arterial Routes, avoiding proposals which would give rise to significant numbers of lorry movements through villages or on unacceptable stretches of road.
- d) do not represent inappropriate development in the Green Belt.
- e) avoid Groundwater Source Protection Zone 1 or Flood Risk Zone 3b.
- f) avoid sites on or in proximity to land where alternative development exists/ has planning permission or is identified in an adopted Local Plan for alternate uses that may prove to be incompatible with the proposed waste management uses on the site.
- g) for energy producing facilities sites are in proximity to potential heat users.
- h) for facilities that may involve prominent structures (including chimney stacks)
 the ability of the landscape to accommodate the structure (including any associated emission plume) after mitigation.
- for facilities involving operations that may give rise to bioaerosols (e.g. composting) to locate at least 250m away from any potentially sensitive receptors.

Where it is demonstrated that provision of capacity additional to that required by Policy CSW 7, or that waste will be dealt with further up the hierarchy, or it is replacing capacity lost at existing sites, facilities that satisfy the relevant criteria above on land in the following locations will be granted consent, providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:

- 1. within or adjacent to an existing mineral development or waste management use
- 2. forming part of a new major development for B8 employment or mixed uses
- 3. within existing industrial estates
- 4. other previously developed, contaminated or derelict land not allocated for another use
- 5. redundant agricultural and forestry buildings and their curtilages

Proposals on a-greenfield land other than in the circumstances of category 2 above will only be permitted if either:

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- A. it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings.
- B. Particular regard will be given to whether if the nature of the proposed waste management activity requires an isolated location.

[Paragraph 6.6 remains unchanged]

- 6.7 Policy CSW 7: Waste Management for Non-hazardous Waste
- **6.7.1** Policy CSW 7 provides a strategy for the provision of new waste management capacity for non-hazardous waste. The policy will <u>allow</u> increase the provision of new waste management capacity for recovery while recognising the need to drive waste up the hierarchy.
- **6.7.2** The term *non-hazardous waste* is regarded, for purposes of the Plan, as being synonymous with MSW (86) and C&I (87) waste <u>and the non inert, non-hazardous, component of CDEW</u>.
- 6.7.3 The Needs Assessment for waste facilities (88) shows that there is no lack of capacity preparation of non-hazardous waste for reuse or recycling during the whole of the plan period. However, the Needs Assessment shows a capacity gap emerging in 2024 for treating green and kitchen wastes and Policy CSW 7 therefore seeks to address that gap in provision. The additional capacity required for composting is a minimum but the figure for EfW capacity is a maximum; this reflects the relative positions of these methods of waste management in the Waste Hierarchy. i.e. that it is preferable to process organic waste to produce compost to burning it to produce heat/power. The use of organic waste to produce a gas that may be used as a fuel via anaerobic digestion is also considered preferable to its direct combustion.
- **6.7.4** There is no intention to restrict the amount of new capacity for waste management for recycling or preparation of waste for reuse or recycling, or for the Furthermore, there is also no intention to restrict provision of the additional capacity of <u>for</u> green and/or kitchen waste treatment facilities to the later part of the plan period since the sooner it is delivered, the greater the impact will be on reducing organic waste going to landfill, the most significant source of methane production.
- 6.7.5 Implementing Policy CSW 7 will result in reducing the amount of Kent non-hazardous waste going for disposal to landfill to less than 76,000 tpa by the end of the plan period. It will also assist in retaining and by doing so conserve existing non-hazardous landfill capacity in Kent at the end of the plan period for any non-hazardous waste that cannot be reused, recycled, composted or recovered. The reliance being placed upon a major increase in additional future capacity through the recovery of waste is regarded as being deliverable due to the responses received to the call for sites for the Waste Sites Plan, which include sufficient EfW proposals to meet the required additional capacity.

Policy CSW 7

Waste Management for Non-hazardous Waste

In seeking to be as self-sufficient as possible in managing non-hazardous waste arisings in Kent, and for providing for limited amounts of non-hazardous waste from London, sufficient sites for waste management facilities will be identified in the Waste Sites Plan to meet identified needs as a minimum, including the following capacity.

- 1. Calculation of capacity at any proposed sites may include recycling and composting in an integrated waste management facility providing the total capacity calculated results in no significant amount of residue having to go to non-hazardous landfill. These figures are based on the high growth forecasts.
- 2. The actual number of facilities required will depend on the throughput capacity of proposed facilities brought forward to meet the identified need. Facilities with a smaller capacity will result in more facilities than indicated being required.
- 3. Additional capacity required to achieve composting rates of 65% C&I waste and 60% MSW by 2025.

Waste management capacity for non-hazardous waste will be provided through sites for managing waste, including Energy from Waste, recycling, in-vessel (enclosed) composting facilities and anaerobic digestion plants.

Sites for anaerobic digestion, composting, Energy from Waste, mechanical biological treatment and other energy and value recovery technologies that assists Kent in meeting the capacity gap identified in this policy continuing to be net self sufficient while providing for a reducing quantity of London's waste, will be granted planning permission provided that:

1. <u>it moves waste up the hierarchy</u>, pre-sorting of the waste is carried out unless proven not to be technically practicable for that particular waste stream 2. recovery of by-products and residues is maximised

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- 3. energy recovery is maximised (utilising both heat and power)
- 4. any residues produced can be managed or disposed of in accordance with the objectives of Policy CSW 2
- 5. sites for the management of green waste and/or kitchen waste in excess of 100 tonnes per week are Animal By Product Regulation compliant (such as in-vessel composting or anaerobic digestion)
- 6. sites for small-scale open composting of green waste (facilities of less than 100 tonnes per week) that are located within a farm unit and the compost is used within that unit.
- 6.8 Policy CSW 8: Other Recovery Facilities for Non-hazardous Waste
- **6.8.1** One of the fundamental aims of the Plan is to reduce the amount of MSW and C&I waste being sent to non-hazardous landfill. There will need to be a substantial increase in waste recovery capacity during the plan period if a rapid shift away from landfill is to occur.
- **6.8.2** To give sufficient flexibility for waste management in Kent up to 2030, high growth forecasts used to estimate the amount of additional recovery capacity indicate that 562,000 tpa will be required (as shown in the table in Policy CSW 7). **Proposals for** additional recovery capacity will need to be designed to operate as Waste Directive Framework compliant recovery processes harness ing the **maximum practicable quantity of** energy produced.
- 6.8.3 Such capacity might be developed in conjunction with waste processing facilities on the same site, or as standalone plants where the waste is processed to produce a fuel off-site. In order to avoid the risk of under provision by double counting both fuel preparation capacity and fuel use capacity, only one of the two facility contributions will be counted towards <u>meeting any emerging need</u> <u>identified by annual monitoring in future</u> the requirement set out in Policy CSW 7. Where fuel preparation takes place as a stand-alone activity, e.g. Mechanical Biological Treatment, the recovery contribution will only be counted as the difference between the input quantity and the output quantity unless the output fuel has a proven market. Where that is the case, if the output fuel is to be used in a combustion plant beyond Kent, then this contribution will also be counted. (89)

89 For example, eff 100 tonnes is fed into the plant: 20 tonnes are lost as moisture; 30 tonnes are diverted as recyclate; 50 tonnes of waste is converted into material that may be suited for use as a fuel. Unless that fuel has a proven market then the contribution counted will be 50 tonnes as the remaining material may end up going to landfill. If the 50 tonnes of fuel goes to a plant built within Kent the recovery contribution will be counted at the combustion plant rather than the fuel preparation plant. If the 50 tonnes of fuel is exported beyond the county then the recovery contribution will be counted at the fuel preparation plant.

Policy CSW 8 Other Recovery Facilities for Non-hazardous Waste

Sites for additional recovery facilities will be identified in the Waste Sites Plan to

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treat a capacity of 562,500 tonnes per annum.

Permission will be granted for a maximum of 437,500 tonnes in total capacity until such time that the results of annual monitoring indicate that this restriction would result in the loss of all non-hazardous landfill capacity in the county before the end of the plan period.

Facilities using waste as a fuel will only be permitted if they qualify as recovery operations as defined by the Revised Waste Framework Directive¹⁰. When an application for a combined heat and power facility has no proposals for use of the heat when electricity production is commenced, the development will only be granted planning permission if—1. the applicant and landowner enter into a planning agreement to market the heat and to produce an annual public report on the progress being made toward finding users for the heat.

6.9 Policy CSW 9: Non Inert Waste Landfill in Kent

- **6.9.1** The lack of response to the call for sites for non-hazardous landfill is indicative of a lack of demand by the waste industry to develop non-hazardous landfill. Nevertheless, a proposed development might come forward during the plan period and if so it will be granted permission providing it complies with both Policy CSW 9 and the DM policies in this Plan. In addition, proposed additional capacity for hazardous waste landfill identified in CSW 12 will be assessed against this policy.
- **6.9.2** Following the completion of a non inert waste landfill site, the site will need to be restored and there will be a considerable period of aftercare during which such sites need to be managed in order to prevent unacceptable adverse impacts to the environment. Aftercare management can require new development in order to either prepare the site for re-use or to manage the landfill gas or leachate production. Policy DM 19 sets out the Plan's provisions with regard to restoration, aftercare and after-use.

[Policy CSW 9 remains unchanged]

[Policy CSW 10: Development at Closed Landfill Sites inc para 6.10.1 preamble remain unchanged]

6.11 Policy CSW 11: Permanent Deposit of Inert Waste

6.11.1 <u>The most recent capacity assessment</u> <u>Needs Assessment</u> for waste facilities (92) shows that there is currently permitted capacity at permanent CD recycling sites of over 2 mtpa which already exceeds the partially revoked SEP recycling target for the later part of the plan period of 1.56 mtpa. However, the target is only a minimum requirement because <u>I</u>t is considered more sustainable to use recycled aggregates than to extract primary aggregates. The term *CD recycling* is

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¹⁰ Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives

synonymous with the term *aggregate recycling* and the criteria for assessing further site proposals for such sites can be read in Policy CSM 8: Secondary and Recycled Aggregates in Chapter 5.

- 6.11.2 <u>The most recent capacity assessment</u> Needs Assessment shows that Kent has existing permitted <u>consented</u> inert waste landfill capacity that is more than sufficient to meet Kent's need for the plan period. It is known that Kent receives a lot of waste originating out of the county, particularly from London, which goes into inert waste landfill in Kent. <u>It has been concluded that</u> The <u>Needs Assessment</u> tested the effects of this import continuing <u>continuation of this waste import</u> throughout the plan period at a rate of 300,000 tpa and concluded that this would still result in a surplus of inert waste landfill capacity of over 10 mt at the end of the plan period <u>can</u> be accommodated by the existing consented capacity.
- **6.11.3** Another important issue is that without the import of inert waste the ability to restore existing permitted mineral workings would take a lot longer. Policy CSW 11: Permanent Deposit of Inert Waste seeks to ensure that a high priority is given to using inert waste that cannot be recycled in the restoration of existing permitted mineral workings, in preference to uses where inert waste is deposited on land (e.g. bund formation or raising land to improve drainage etc).

[Policy CSW11 remains unchanged]

- 6.12 Policy CSW 12: Identifying Sites for Hazardous Waste Management
- **6.12.1** Hazardous waste arising in Kent is one of the smaller streams of waste; in 2008 it only accounted for 3.1% of the total waste arising in the county. The management of hazardous waste is typically characterised by the following: **H**azardous waste is often produced in small quantities **and** hazardous waste management facilities are often highly specialised with regional or even national catchment areas **involving** considerable movement of hazardous waste occurs with both waste originating in Kent going outside the county for management and hazardous waste coming into the county for management.
- **6.12.2** When hazardous waste management in Kent is viewed as a whole, net self-sufficiency in hazardous waste management is achieved. However, the *Hazardous Waste Topic Paper* (93) identified that Kent could cease to be net self-sufficient in hazardous waste capacity if changes in the production profile and management **profile** of hazardous waste occur as follows:
 - the continued demand for disposal capacity for flue residues from Allington EfW facility
 - the likely increase in hazardous residues from air pollution control from additional EfW capacity requiring management
 - if the existing asbestos landfill closes then Kent will cease to import a significant amount of asbestos based hazardous waste will cease to be imported into the county.

6.12.3 The former issue is partly dealt with through the identification of a Strategic Site for Waste in Policy CSW 5. The need for management capacity of additional EfW APC residues can be addressed through Policy CSW 12 should it be required. **Any proposals for future** provision for asbestos landfill capacity will be **addressed using by Policy CSW9** through identification of a site in the Waste Sites Plan.

Policy CSW 12

Identifying Sites for Hazardous Waste Management

To maintain net self-sufficiency in the management of hazardous waste throughout the plan period, developments proposals for built hazardous waste management facilities will be granted planning permission in locations specified in consistent with Policy CSW 6, regardless of whether their catchment areas for waste extend outside beyond Kent.

A site will also be identified in the Waste Sites Plan for the landfilling of asbestos waste that is consistent with the criteria in Policy CSW 11: Permanent Deposit of Inert Waste to enable the continuation of asbestos disposal within the county.

[Policy CSW 13 remains unchanged]

6.14 Policy CSW 14: Disposal of Dredgings

6.14.1 Retaining the navigable channels within the estuaries within Kent is the statutory duty of the Port of London Authority (PLA) and the Medway Ports Authority. When the dredged materials do not consist of aggregates or cannot be accommodated within projects to enhance the biodiversity of the estuaries, then landfill is the only option currently available. A landfill site with river access is needed. A site for the disposal of dredgings will be safeguarded through identification in the Waste Sites Plan.

Policy CSW 14

Disposal of Dredgings

A site for the disposal of dredgings will be identified in the Waste Sites Plan and the site will be safeguarded from other development. Planning permission will be granted for new sites for the disposal of dredging materials where it can be demonstrated that:

- 1. the re-use of the material to be disposed of is not practicable
- 2. there are no opportunities to use the material to enhance the biodiversity of the Kent estuaries

8 Managing and Monitoring the Delivery of the Strategy

[Changes to be made to the monitoring framework to reflect changes to the policies as set out above. This affects monitoring of policies CSW4, CSW6, CSW7, CSW8 and CSW12]

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Appendix A: Glossary

Local Plan The Kent MWLP comprises all adopted local plans that will include the Kent MWLP, the Minerals Sites Plan, the Waste Sites

Plan and the district local plan. A Local Plan is a Development Plan Document that includes planning policies for a local area. A Local Plan forms part of the Development Plan for an Area.

Appendix B: List of Replaced, Deleted and Retained Policies

It is KCC's intention to replace a All the previously adopted minerals and waste policies are replaced by plans with the Kent MWLP 2013-30 and the Minerals waste Sites Plans. The Kent Minerals

and Waste Plans previously in force are listed below:

Kent Minerals Local Plan: Brickearth (1986)

Kent Minerals Local Plan Construction Aggregates (1993)

Kent Minerals Local Plan Chalk and Clay (1997)

Kent Minerals Local Plan Oil and Gas (1997)

Kent Waste Local Plan (1998)

All of these plans were prepared before Medway Council was formed and these plans therefore covered areas which are now within Medway.

The Secretary of State for the Government Office for the South East wrote separately to both KCC and Medway Council on 21 September 2007 providing a direction on the policies in the previously adopted minerals and waste plans. Any polices not listed by the Secretary of State expired and those listed in the Direction are known as the 'saved policies'. It is the saved policies that are deleted by the Minerals and Waste Plan, and the Minerals and Waste Sites Plans once adopted. KCC and Medway Council have separate letters of direction from the Secretary of State and therefore the deletion of saved policies by KCC has no effect on Medway Council's saved policies.

There are five saved policies which will not be deleted until the Minerals and Waste Sites Plans are adopted. These saved policies identify land where it would be considered acceptable in principle for developments as mineral or waste sites.

In Appendix B add following text beneath the table entitled 'Saved Policies being Deleted':

<u>Saved Policy CA6 – 'Areas of Search within which the Extraction of minerals is</u> <u>Acceptable in Principle' is deleted and replaced by the Kent Mineral Sites Plan</u>

Saved Policy B1 – 'Locations Suitable in Principle for the Extraction of Brickearth' is deleted.

Insert table in Appendix B under section 'Saved Policies being Deleted':

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Kent Waste Local Plan 1998 Saved Policies		
<u>W7</u>	Locations Suitable in Principle for Inert Waste to be Prepared for Recycling or Re-	Policy deleted
	<u>use</u>	
<u>W9</u>	Locations Suitable in Principle for Waste	Policy deleted
	Separation and Transfer Proposals	
W11	Locations with Potential for EfW	Policy deleted
	<u>Proposals</u>	

Modify the table in Appendix B under section 'Saved Policies being Retained' as follows:

Kent Minerals Local Plan: Construction Aggregates 1993 Saved Policy		
CA6	Areas of Search within which the Extraction of minerals is Acceptable in	
	Principle	
Kent Waste Local Plan 1998 Saved Policies		
W7	Locations Suitable in Principle for Inert Waste to be Prepared for Recycling or Re-use	
W9	Locations Suitable in Principle for Waste Separation and Transfer Proposals	
W11	Locations with Potential for EfW Proposals	
Kent Minerals Subject Plan: Brickearth 1986 Saved Policy		
B1	Locations Suitable in Principle for the Extraction of Brickearth	

[Note that the proposed deletion of saved policies CA6 and B1 is a result of the preparation of the Mineral Sites Plan that will provide updated policy on the allocation of land for minerals extraction]

3.0 Proposed modification to relating to minerals and waste safeguarding: Policies DM 7 and DM 8

3.1 Background

Sections 5.5, 5.6, and 5.7 of the adopted Kent Minerals and Waste Local Plan (KMWLP) set out policies (CSM5, CSM6 and CSM7), with reasoned justification, for the safeguarding of:

- 1. Land-won minerals (as defined in the Minerals Safeguarding Areas (MSAs)) from needless sterilisation from other development; and,
- 2. Minerals supply and waste management and transport infrastructure from direct, and potential, loss due to incompatible development being sited nearby such that it has the potential to prejudice their future lawful operation.

Further policies, DM 7 and DM 8, are included to ensure that the safeguarding is not unduly rigid in its application. Policies DM7 and DM8 set out criteria to allow development that may affect safeguarded resources and sites to proceed in certain prescribed circumstances.

Since adoption of the KMWLP, experience in the implementation of the Policies DM7 and DM8 has revealed that ambiguity in the wording of certain of their exempting criteria hinders their effectiveness. Revisions to both policies (as set out below) are therefore proposed to ensure they can be applied effectively in future. Additional wording to the supporting text is also provided to reflect the now adopted status of the related Supplementary Planning Document.

3.2 Policy DM 7 – Safeguarding Mineral Resources

Policy DM 7 sets out the circumstances in which surface non-minerals development may be acceptable at a location within an MSA. This policy recognises that the aim of safeguarding is to avoid unnecessary sterilisation of resources and encourage prior extraction of the mineral where practicable and viable before non-mineral development occurs. The policy in its adopted form reads as below:

Policy DM 7

Safeguarding Mineral Resources

Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding where it is demonstrated that either:

- 1. the mineral is not of economic value or does not exist; or
- 2. that extraction of the mineral would not be viable or practicable; or
- 3. the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals

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development; or

- 4. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or
- 5. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
- 6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or
- 7. it constitutes development on a site allocated in the adopted development plan

Further guidance on the application of this policy will be included in a Supplementary Planning Document.

The particular criterion of concern is criterion 7. The purpose of criterion 7 is to recognise that the process of local plan formulation, consultation, independent examination and subsequent adoption would normally take account of, and address, land won mineral safeguarding matters. In other words, it is assumed that where land is allocated in a Local Plan for surface development, such as housing, the presence of a mineral resource, and the need for its safeguarding, will have been factored into the consideration of whether allocation of that land for development is appropriate. This means that proposals for development on land allocated in Local Plans for a given type of development do not need to consider criteria 1 to 6.

Where economic minerals are identified in an MSA whose extent coincides with allocations for non-mineral development that would have a potentially sterilising effect on these mineral resources, then a full assessment that meets the other criteria 1 to 6 (where appropriate) of the policy should be completed, to the satisfaction of the Mineral Planning Authority (MPA).

However, application of the policy has revealed that sterilising development is being proposed on land allocated in a Local Plan, that is also within an MSA, where the original allocation did not take into account mineral safeguarding. In this regard it has been suggested that the criterion 'it constitutes development on a site allocated in the adopted development plan' should be interpreted literally, such that provided there is an adopted development plan with allocations, regardless of whether the development is incompatible with the mineral safeguarding principles, development in those areas is, in all cases, exempt from the need to consider safeguarding.

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In order to improve the effectiveness of criterion 7 (and to close this 'loop hole') revised wording is therefore proposed. Furthermore, amendments are also proposed to reflect the now adopted status of the Supplementary Planning Document on Safeguarding:

Policy DM 7

Safeguarding Mineral Resources

Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding where it is demonstrated that either:

- 1. the mineral is not of economic value or does not exist; or
- 2. that extraction of the mineral would not be viable or practicable; or
- 3. the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or
- 4. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed: or
- 5. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
- 6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or
- 7. it constitutes development on a site allocated in the adopted development plan where consideration of the above factors (1-6) concluded that mineral resources will not be needlessly sterilised.

Further guidance on the application of this policy is will be included in a Supplementary Planning Document.

3.3 Policy DM 8 - Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Permitted waste management and minerals supply infrastructure plays a crucial role in ensuring the effective management of waste and supply of minerals in the county and is safeguarded from development which may adversely impact on its effective operation. Certain types of non-waste and minerals development which may be sensitive to noise, dust and visual impacts associated with infrastructure (e.g. housing) may not always be compatible. Policies CSM6 and CSM7 therefore expect the presence of waste and minerals infrastructure to be taken into account in decisions on proposals for non-waste and minerals development made in the vicinity of such infrastructure.

Policy DM 8 recognises that in certain circumstances redevelopment of sites hosting waste and minerals infrastructure, or nearby non minerals and waste development, may be acceptable. Policy DM8 allows such development when a replacement facility is identified that is at least equivalent to that which it is replacing and it specifies how this should be assessed. The policy in its adopted form reads as follows:

Policy DM 8 - Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:

- 1. it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or
- 2. it constitutes development on the site that has been allocated in the adopted development plan; or
- 3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or
- 4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
- 5. the facility is not viable or capable of being made viable; or
- 6. material considerations indicate that the need for development overrides the presumption for safeguarding; or
- 7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land

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for processing and stockpiling of waste and minerals, and: in the case of wharves, the size of the berth for dredgers, barges or ships in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy.

Criterion 2 of the policy has the same wording as criterion 7 of Policy DM 7 and the issue regarding the effectiveness of Policy DM7 (as set out above) therefore also applies to Policy DM8. Therefore, in order to ensure that Policy DM8 is effective in its consideration of non-minerals and waste development proposed on sites allocated in adopted local plans the following wording is proposed:

Policy DM 8 - Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:

- 1. it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or
- 2. it constitutes development on the site that has been allocated in the adopted development plan where consideration of the other criteria (1, 3-7) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation production and waste management facilities has been fully considered and it was concluded that certain types non-mineral and waste development in those locations would be acceptable; or
- 3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or
- 4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
- 5. the facility is not viable or capable of being made viable; or
- 6. material considerations indicate that the need for development overrides the presumption for safeguarding; or
- 7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste <u>(and materials/residues resulting from waste management processes)</u> and minerals, and:

- in the case of wharves, the size of the berth for dredgers, barges or ships
- in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy.

There must also be no existing, planned or proposed developments that could constrain the operation of the replacement site at the required capacity.

Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.

Further guidance on the application of this policy will be included in a Supplementary Planning Document.

In light of the above it is proposed that related explanatory text of the KMWLP be modified as set out below.

7.5 Policy DM 7: Safeguarding Mineral Resources

- **7.5.1** As set out in section 5.5, it is important that certain mineral resources in Kent are safeguarded for potential use by future generations. However, from time to time, proposals to develop areas overlying safeguarded minerals resources for non—minerals purposes will come forward. The need for such development will be weighed against the need to avoid sterilisation of the underlying mineral and the objectives and policies of the development plans as a whole will need to be considered when determining proposals.
- **7.5.2** Policy DM 7 sets out the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. This policy recognises that the aim of safeguarding is to avoid unnecessary sterilisation of resources and encourage prior extraction of the mineral where practicable and viable before non-mineral development occurs.
- **7.5.3** Proposals located in MSAs will usually need to be accompanied by a 'Minerals Assessment', prepared by the promoter, which will include information concerning

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the availability of the mineral, its scarcity, the timescale for the development, the practicability and the viability of the prior extraction of the mineral. Guidance on undertaking Minerals Assessments is included in the BGS Good Practice Advice on Safeguarding. Further guidance <u>is</u> will be provided through a Supplementary Planning Document. (111)

- 7.5.4 Where proposals are determined by a district/borough planning authority, the Mineral Planning Authority will work with the relevant authority and/or the promoter to assess the viability and practicability of prior extraction of the minerals resource. <u>As necessary the Minerals Planning Authority will provide information that helps determine the economic viability of the resource.</u>
- 7.5.5 In certain cases it is possible that the need for a particular type of development in a particular location is so important that it overrides the need to avoid sterilisation of the safeguarded mineral resource. Such cases will be highly exceptional and it will be necessary to demonstrate the overriding importance of the development, such as whether the development is of strategic national importance, and why the need cannot practically be met elsewhere.
- 7.5.6 Criterion 7 of Policy DM7 recognises that the allocation of land in adopted Local Plans for non-mineral development, such as housing, should have considered the presence of an economic mineral resource and the need for its safeguarding at this time, and, where that is shown to be the case to the satisfaction of the Mineral Planning Authority, there is no need to revisit mineral safeguarding considerations at the planning application stage. The Mineral Planning Authority and the district/borough planning authority will consider mineral safeguarding during the preparation of Local Plans e.g. during preparation of Strategic Housing Land Availability Assessments.

Footnote 111 Preparation of t<u>T</u>he Supplementary Planning Document will <u>be maintained by the County Council and updated as required</u> involve consultation with stakeholders including the minerals and development industry.

7.6 Policy DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities

- **7.6.1** It is essential to the delivery of this Plan's minerals and waste strategy that existing facilities (113) used for the management of minerals (including wharves and rail depots) and waste are safeguarded for the future, in order to enable them to continue to be used to produce and transport the minerals needed by society and manage its waste.
- **7.6.2** Policy DM 8 sets out the circumstances when safeguarded minerals and waste development may be replaced by non-waste and minerals uses. This includes ensuring that any replacement facility is at least equivalent to that which it is replacing and it specifies how this should be assessed.

- **7.6.3** In the case of mineral wharves the factors to be considered include the depths of water at the berth, accessibility of the wharf at various states of the tide, length of the berth, the size and suitability of adjacent land for processing plant, weighbridges and stockpiles, and existing, planned or proposed development that may constrain operations at the replacement site at the required capacity.
- **7.6.4** There also are circumstances when development proposals in the vicinity of safeguarded facilities will come forward. The need for such development will be weighed against the need to retain the facility and the objectives and policies of the development plan as a whole will need to be considered when determining proposals. Policy DM 8 sets out the circumstances when development may be acceptable in a location proximate to such facilities. The policy recognises that the aim of safeguarding is to avoid development which may impair the effectiveness and acceptability of the infrastructure.
- **7.6.5** Certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with minerals production or waste management activities which are industrial in nature. Policy DM 8 therefore expects the presence of waste and minerals infrastructure to be taken into account in decisions on proposals for non-waste and minerals development (known as 'agents of change') made in the vicinity of such infrastructure.
- 7.6.6 Criterion 2 of Policy DM8 recognises that the allocation of land in adopted Local Plans for development, such as housing, should have considered the presence of waste management and minerals supply infrastructure and the need for its safeguarding at that time, and, where this has been shown to be the case to the satisfaction of the Mineral Planning Authority, there is no need to revisit the safeguarding considerations at planning application stage.
- 7.6.7 Further guidance on the implementation of this policy is included in a Supplementary Planning Document.

Appendix 1 - Waste Needs Assessment – Summary of Key Conclusions

A recent review¹¹ of the future needs for waste management facilities in Kent has concluded that the development of the additional capacity is not required to the extent that a separate Waste Sites Plan would be justified. This is for the following reasons:

- Energy recovery capacity: Additional capacity at Kemsley SEP now confirmed.
- Hazardous waste: Due to the lack of need for additional capacity to allow for the continued landfilling of projected arisings of asbestos from Kent within Kent.
- 3. Disposal of Dredgings: No clear need identified by Port of London Authority (PLA) (the responsible navigation authority).

These identified needs i.e. projected capacity deficits, are discussed further below. In addition, while there remains an identified need for organic waste treatment capacity, it is considered that adopted policy in the MWLP is sufficiently permissive and positive enough for applications to be encouraged to come forward without the need for allocation of specific sites.

1. Energy Recovery Capacity.

Table A1 presents the findings of the review in relation to the predicted need for additional Non Hazardous Residual Waste Energy Recovery capacity. Essentially the delivery of the Kemsley SEP now more than fulfils the predicted need.

¹¹ BPP Consulting Kent Waste Needs Assessment 2016-17

<u>Table A1:</u> Projected Overall Non Hazardous Residual Waste Management Needs (tonnes)

	2016	2021	2026	2024
	2016	2021	2020	2031
Other Recovery Requirement	666,000	842,000	798,000	751,000
minus Allington capacity	500,000	500,000	500,000	500,000
Remainder	166,000	342,000	298,000	251,000
minus Kemsley capacity at 2020	0	525,000	525,000	525,000
Other Recovery capacity gap		400.000	007.000	074.000
shortfall (+ve) / surplus (-ve)	-	-183,000	-227,000	-274,000
Residual Waste from London				
combining projected exports and	34,500	54,500	54,500	55,000
Kent waste to Rainham LF ¹²				
Remaining Other Recovery				
Capacity Gap	-	-128,500	-172,500	-219,000
shortfall (+ve) / surplus (-ve)				

2. Hazardous waste

The approach taken in the adopted KMWLP includes a commitment to maintaining net self-sufficiency for hazardous waste management as stated in Policy CSW12. In reality, application of the principle of net self-sufficiency does not require capacity to be provided to manage every tonne of every waste stream within the Plan Area, rather than an equivalent tonnage be managed. This is particularly the case when considering hazardous waste management capacity as hazardous waste is a heterogeneous waste stream within which particular waste types may have very specific management needs. This 'special case' is recognised by national policy.

In the case of Kent, the Needs Assessment review found that there is currently a reasonably good match between types of hazardous waste produced and management capacity. However, provision of capacity to manage asbestos and air pollution control (APC) residues requires particular attention given that current

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¹² The closure date of Rainham Landfill has been extended to 2026 by planning permission granted in September 2016. It should also be noted that a further permission has been granted to operate a "soil repair centre" to the end of 2031. This facility might accept the principal type of Kent waste deposited at the landfill, sewage screenings, and hence continue to provide for that Kent waste for the full plan period. This indicates that the additional provision for Kent waste predicted to be displaced from Rainham might be dispensed with entirely.

capacity for both is in the form of landfill void which by definition is a finite and diminishing resource.

Since the implementation of the Landfill Directive, hazardous waste can only be disposed either to a dedicated hazardous waste landfill site or into a special cell within a non-hazardous waste landfill site. The only two operational landfill sites in Kent accepting hazardous waste are as follows:

- 1. Norwood Quarry: Restricted input receiving Allington EfW residues to restore clay working.
- 2. Pinden Quarry: Merchant site accepting asbestos based waste mixed with inert material to restore chalk quarry working.

Provision has already been made in the KMWLP for the continued disposal of Allington EfW APC residues to Norwood Farm landfill, by identifying an extension as a strategic site in Policy CSW 5.

Data obtained for remaining void at Pinden Quarry Landfill suggests that, if inputs of asbestos waste were limited to an amount equivalent to the arisings in Kent over the plan period then there is likely to be sufficient capacity.

It should be noted that the approach taken in the adopted KMWLP was informed by the fact that a proposal to include an extension to Pinden Quarry Landfill as an allocation was put forward by the operator during the first call for sites in 2012. However, no such proposal was put forward in response to the second call for sites in 2016-2017. Nor has an application been forthcoming. It is therefore considered that the identification of a specific additional landfill for hazardous waste (asbestos CDEW) to manage Kent arisings (c 7,000tpa) is not justified.

3. Disposal of Dredgings

As dredgings are a specialist waste being generated solely from the dredging of navigable waterways undertaken by the Port of London Authority (PLA) that has responsibility for maintaining the Thames. The PLA was therefore approached to confirm its need for additional landfill capacity and it confirmed that there was no need for a specific landfill to be identified in the Plan at this time. On the basis of this it is now considered that the need for landfill initially identified no longer exists and dredging are now being managed through other more sustainable means.

Appendix 2 – Clean Copy of Proposed Modifications

Assuming the proposed modifications are adopted, the Kent Minerals and Waste Local Plan 2013-30 would read:

Proposed Modifications to Text of the Kent Minerals and Waste Local Plan Concerning Waste Management

1 Introduction

1.1.3 The specific sites for mineral developments will be set out in the separate Kent Minerals Sites Plan. The site selection process for the final sites included in the Minerals Sites Plan will be based on the policies in the Kent MWLP.

.....

1.2.2 The policies in this Plan replace the earlier versions of the saved Kent Minerals and Waste Local Plan policies. Appendix B lists the schedules of saved Kent Local Plan policies replaced, deleted or retained.

6 Delivery Strategy for Waste

[Policy CSW1 and para 6.1.1- 6.1.2 remain unchanged]

- 6.2 Policy CSW 2: Waste Hierarchy and Policy CSW 3: Waste Reduction
- **6.2.1** It is Government policy to break the link between economic growth and the environmental impact of waste by moving the management of waste up the Waste Hierarchy, as shown in Figure 18. (75)

[Figure 18 Waste Hierarchy remains unchanged]

- **6.2.2** The Kent MWLP mainly implements this policy through influence over waste and minerals developments. However, the Plan also includes a policy (Policy CSW 3) seeking to influence/reduce waste arising from all forms of development. The Kent MWLP forms part of the development plan, along with the district local plans, and is therefore relevant to the determination of planning applications for all forms of development in Kent.
- **6.2.3** In accordance with the Waste Hierarchy, the Plan gives priority to planning for waste management developments that prepare waste for re-use or recycling. The most recent assessment of waste management capacity requirements ⁽⁷⁶⁾ shows that Kent's current recycling and processing facilities have sufficient capacity for the

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anticipated rate of usage with the exception of facilities for green and kitchen wastes. It should be appreciated that these calculations are based upon a rate of use that should only be regarded as a minimum, as the aspiration is to encourage more of the waste that is produced in Kent to be managed by methods at this tier of the hierarchy.

- **6.2.4** Encouraging more waste to be managed via re-use or recycling will be achieved by enabling policies for the development of additional waste management capacity for recycling and processing including a policy presumption to grant planning permission for redevelopment or extensions to lawful existing waste management facilities to enable more waste to be recycled or processed for re-use providing the proposal is in accordance with the locational and development management policies in the Plan.
- **6.2.5** The application of the Waste Hierarchy is a legal requirement under the Waste (England and Wales) Regulations 2011. It is anticipated that there will be a transition over time to forms of waste management at the higher end of the Waste Hierarchy. The Kent MWLP addresses this transition by seeking to rapidly provide a more sustainable option for the mixed non-hazardous waste that is going to landfill by applying ambitious but achievable landfill diversion targets presented in Policy CSW 4.

Footnote 76 BPP Consulting Waste Needs Assessment 2018.

[Policies CSW 2 and CSW 3 remain unchanged]

6.3 Policy CSW 4: Strategy for Waste Management Capacity

Net Self-sufficiency and Waste Movements

6.3.1 Kent currently achieves net self-sufficiency in waste management capacity for all waste streams. I.e. the annual capacity of the waste management facilities (excluding transfer) in Kent is sufficient to manage the equivalent quantity of waste to that predicted to arise in Kent. The continued achievement of net self-sufficiency and the management of waste close to its source are key Strategic Objectives of the Kent MWLP, because it shows that Kent is not placing any unnecessary burden on other WPAs to manage its waste. Net self-sufficiency recognises that existing (and future) waste management capacity within Kent may not necessarily be for the exclusive management of Kent's waste. Moreover, proposals that would result in more waste being managed in Kent than is produced may be acceptable if they resulted in waste moving up the hierarchy. Achievement of net self-sufficiency is the baseline aspiration and can be monitored on an annual basis and will provide an indicator as to whether the policies in the Plan need to be reviewed. The purpose in adopting the principle of net self-sufficiency is not to restrict the movement of waste as such restriction of waste catchment areas could have an adverse effect upon the

viability of the development of new waste management facilities needed to provide additional capacity for Kent's waste arisings.

6.3.2 In reality, different types of waste are managed at different types of facilities. To assess the future needs for waste facilities in Kent, net self-sufficiency has been studied for the individual waste streams of inert, non-inert (also called non-hazardous) and hazardous wastes. While Kent currently achieves net self-sufficiency, this position will be monitored to ensure this remains the case throughout the plan period. The purpose in adopting the principle of net self-sufficiency is not to restrict the movement of waste as such restriction of waste catchment areas could have an adverse effect upon the viability of the development of additional waste management capacity.

Provision for Waste From London

- **6.3.3** Specific provision in the calculations for capacity required for non-hazardous waste going to landfill or EfW has been made for waste from London. The reason for this is that due to land constraints London's residual waste cannot all be managed within London itself and so, as a neighbouring waste planning authority, Kent County Council has some responsibility to make provision for an element of this waste. Historical data indicates the tonnage to be provided for is in the region of 35,000 tonnes per annum. It is also recognised that closure of Rainham Landfill in the London Borough of Havering in 2026 may result in the displacement of waste from Kent currently managed there. Therefore, an additional tonnage of 20,000 tpa has been planned for on a contingency basis.
- **6.3.4** An assessment has been made of the current profile of management of the principal waste streams. The targets applied reflect ambitious (but realistic) goals for moving waste up the hierarchy and seek to ensure that the maximum quantity of non-hazardous waste is diverted from landfill.

Policy CSW 4

Strategy for Waste Management Capacity

The strategy for waste management capacity in Kent is to provide sufficient waste management capacity to manage at least the equivalent of the waste arising in Kent plus some residual non-hazardous waste from London. As a minimum it is to achieve the targets set out below for recycling and composting and other forms of recovery.

	Milestone Year			
	2015/16	2020/21	2025/26	2030/31
Local Authority Collected	Waste			
Recycling/composting ¹³	<u>n/a</u>	<u>50%</u>	<u>55%</u>	<u>60%</u>
Other Recovery	<u>n/a</u>	<u>48%</u>	<u>43%</u>	<u>38%</u>
Remainder to Landfill	<u>n/a</u>	<u>2%</u>	<u>2%</u>	<u>2%</u>
Commercial & Industrial V	<u>Vaste</u>			
Recycling/composting ¹⁴	<u>n/a</u>	<u>50%</u>	<u>55%</u>	<u>60%</u>
Other Recovery	<u>n/a</u>	<u>35%</u>	<u>32.5%</u>	<u>30%</u>
Remainder to Landfill	<u>n/a</u>	<u>15%</u>	<u>12.5%</u>	<u>10%</u>
Construction & Demolition	Waste (N	on-Inert O	nly)	
Recycling	<u>n/a</u>	<u>12%</u>	<u>13%</u>	<u>14%</u>
Composting	<u>n/a</u>	<u>1%</u>	<u>1%</u>	<u>1%</u>
Other Recovery	<u>n/a</u>	<u>5%</u>	<u>5%</u>	<u>5%</u>
Remainder to Landfill	<u>n/a</u>	<u>2%</u>	<u>1%</u>	0.5%

It should be noted that the values shown for 'Remainder to Landfill' are not targets but are included to show the predicted requirement for landfill in light of the achievement of the targets to move waste up the waste hierarchy.

6.4 Policy CSW 5: Strategic Site for Waste

6.4.1 To meet the Kent MWLP objective of reducing the amount of waste being landfilled, the Plan is using policies to drive a major change in the way that waste is managed in Kent. Enabling the change in perception of waste from being something

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¹³ This is taken to include organic waste (including green and kitchen waste) treatment by Anaerobic Digestion

¹⁴ This is taken to include organic waste (including green and kitchen waste) treatment by Anaerobic Digestion

that has to be disposed to something that can be used as a resource will be helped by the development of such additional capacity further up the hierarchy.

- **6.4.2** The landfill at Norwood Quarry on the Isle of Sheppey accommodates the hazardous flue ash residues from the Allington EfW facility that features heavily in the Waste Management Unit (WMU) contracts for residual MSW, but it has limited consented void space remaining. To make provision for this waste for the duration of the Plan an extension to Norwood Quarry is identified. Enabling the continued management of hazardous flue ash within Kent has the added benefit of contributing to achieving net self-sufficiency in hazardous waste management capacity. (83) **6.4.3** While there is a risk that identifying the extension area at Norwood Quarry as a Strategic Site for Waste could hinder the development of alternative treatment solutions for the flue ash, there is a need to make provision for this waste stream.
- **6.4.4** The proposed extension areas to Norwood Landfill are identified as the Strategic Site for Waste. The location of these extension areas is shown on Figure 19.

Policy CSW5

Strategic Site for Waste

The proposed extension areas for Norwood Quarry and Landfill Site, Isle of Sheppey are together identified as the Strategic Site for Waste in Kent. The site location is shown on Figure 19. Planning permission will not be granted for any other development other than mineral working with restoration through the landfilling of hazardous (flue) dust ash residues from Energy from Waste plants.

Mineral working and restoration by hazardous landfill and any ancillary treatment plant at the Strategic Site for Waste will be permitted subject to meeting the requirements of the development plan and the following criteria:

- 1. Demonstration that the site can be suitably restored in the event that landfilling of hazardous (flue) dust ash residues from Energy from Waste plants were to cease before completion of the final landform due to changes in treatment capacity and/or government policy that may result in the diversion of these wastes from landfill.
- 2. an air quality assessment is made of the impact of the proposed development and its associated traffic movements (84) on the Medway Estuary and Marshes Special Protection Area and the Swale Special Protection Area sites and if necessary mitigation measures are required through planning condition and/or planning obligation
- 3. the site and any associated land being restored to a high-quality standard and appropriate after-use that accords with the local landscape character
- 4. Any proposal for this site would need to consider the requirements of other relevant polices of this Plan and in particular would need to consider any impacts on the A2500 Lower Road. Depending on the nature of any proposal it may be necessary for the developer to make a contribution to the

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improvement of this road.

- 6.5 Policy CSW 6: Location of Built Waste Management Facilities
- **6.5.1** The preference identified in response to earlier consultations during the formulation of the Plan was for a mix of new small and large sites for waste management. This mix gives flexibility and assists in balancing the benefits of proximity to waste arisings while enabling developers of large facilities to exploit economies of scale. National policy recognises that new facilities will need to serve catchment areas large enough to secure economic viability and this is particularly relevant when considering the possible sizing and location of facilities required to satisfy any emerging need indicated by monitoring e.g. in the relevant AMR.
- **6.5.2** The location of waste sites in appropriate industrial estates was also the preference identified from the consultation. This has the benefit of using previously developed land and enabling waste uses to be located proximate to waste arisings. Employment land availability is monitored by KCC and the district and borough councils. (85) It should be appreciated that all industrial estate locations may not be suitable for some types of waste uses, because of their limited size or close proximity to sensitive receptors or high land and rent costs.
- **6.5.3** Certain types of waste or waste management facilities, such as Construction, Demolition and Excavation (CDE) recycling facilities are often co-located on mineral sites for aggregates or landfills, which are usually found in rural areas. Also, in rural areas where either the non-processed waste arisings or the processed product can be of benefit to agricultural land (as is the case with compost and anaerobic digestion), the most proximate location for the waste management facility will likely be within the rural area.
- **6.5.4** The development of waste management facilities on previously developed land will be given preference over the development of greenfield sites. In particular, the redevelopment of derelict or contaminated land may involve treatment of soil to facilitate the redevelopment. Also, redundant agricultural or forestry buildings may be suitable for waste uses where such uses are to be located within the rural areas of the county. Waste management facilities located in the Green Belt are generally regarded as inappropriate development. Developers proposing a waste management facility within the Green Belt shall demonstrate the proposed use complies with Green Belt policy (See Policy DM4).
- **6.5.5** The development of built waste management facilities on greenfield sites is not precluded. This is because the goal of achieving sustainable development will lead to new development which may incorporate facilities to recycle or process the waste produced on the site, or to generate energy for use on the site.
- **6.5.6** Existing mineral and waste management sites may offer good locations for siting certain waste management facilities and for expansion to deliver further capacity to that which exists because of their infrastructure and location. In such

cases, the developer will need to demonstrate the benefits of co-location such as connectivity with the existing use of the site while also demonstrating that any cumulative impact is acceptable. For example, the co-location of CDE recycling (i.e. aggregate recycling) at an aggregate quarry that can enable the blending of recycled and virgin aggregates to increase the marketability of the product or the addition of a facility that will move waste further up the hierarchy at an existing EfW site.

6.5.7 Policy CSW 6 applies to all proposals for built waste management facilities.

Policy CSW 6 Location of Built Waste Management Facilities

Planning permission will be granted for proposals that:

- a) do not give rise to significant adverse impacts upon national and international designated sites, including Areas of Outstanding Natural Beauty (AONB), Sites of Special Scientific Interest (SSSI), Special Areas of Conservation (SAC), Special Protection Areas (SPAs), Ramsar sites, Ancient Monuments and registered Historic Parks and Gardens. (See Figures 4, 5 & 6).
- b) do not give rise to significant adverse impacts upon Local Wildlife Sites (LWS), Local Nature Reserves (LNR), Ancient Woodland, Air Quality Management Areas (AQMAs) and groundwater resources. (See Figures 7, 8, 10 & 15)
- c) are well located in relation to Kent's Key Arterial Routes, avoiding proposals which would give rise to significant numbers of lorry movements through villages or on unacceptable stretches of road.
- d) do not represent inappropriate development in the Green Belt.
- e) avoid Groundwater Source Protection Zone 1 or Flood Risk Zone 3b.
- f) avoid sites on or in proximity to land where alternative development exists/ has planning permission or is identified in an adopted Local Plan for alternate uses that may prove to be incompatible with the proposed waste management uses on the site.
- g) for energy producing facilities sites are in proximity to potential heat users.
- h) for facilities that may involve prominent structures (including chimney stacks)
 the ability of the landscape to accommodate the structure (including any associated emission plume) after mitigation.

 for facilities involving operations that may give rise to bioaerosols (e.g. composting) to locate at least 250m away from any potentially sensitive receptors.

Where it is demonstrated that waste will be dealt with further up the hierarchy, or it is replacing capacity lost at existing sites, facilities that satisfy the relevant criteria above on land in the following locations will be granted consent, providing there is no adverse impact on the environment and communities and where such uses are compatible with the development plan:

- 1. within or adjacent to an existing mineral development or waste management use
- 2. forming part of a new major development for B8 employment or mixed uses
- 3. within existing industrial estates
- 4. other previously developed, contaminated or derelict land not allocated for another use
- 5. redundant agricultural and forestry buildings and their curtilages

Proposals on greenfield land will only be permitted if it can be demonstrated that there are no suitable locations identifiable from categories 1 to 5 above within the intended catchment area of waste arisings. Particular regard will be given to whether the nature of the proposed waste management activity requires an isolated location.

[Paragraph 6.6 remains unchanged]

- 6.7 Policy CSW 7: Waste Management for Non-hazardous Waste
- **6.7.1** Policy CSW 7 provides a strategy for the provision of new waste management capacity for non-hazardous waste. The policy will allow the provision of new waste management capacity recognising the need to drive waste up the hierarchy.
- **6.7.2** The term *non-hazardous waste* is regarded, for purposes of the Plan, as being synonymous with MSW (86) and C&I (87) waste and the non inert, non-hazardous, component of CDEW.
- **6.7.4** There is no intention to restrict the amount of new capacity for waste management for recycling or preparation of waste for reuse or recycling, or for the provision of additional capacity for green and/or kitchen waste treatment since the sooner it is delivered, the greater the impact will be on reducing organic waste going to landfill, the most significant source of methane production.
- **6.7.5** Implementing Policy CSW 7 will result in reducing the amount of Kent non-hazardous waste going for disposal to landfill and by doing so conserve existing non-hazardous landfill capacity in Kent for any non-hazardous waste that cannot be reused, recycled, composted or recovered.

Policy CSW 7

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Waste Management for Non-hazardous Waste

Waste management capacity for non-hazardous waste that assists Kent in continuing to be net self-sufficient while providing for a reducing quantity of London's waste, will be granted planning permission provided that:

- 1. it moves waste up the hierarchy,
- 2. recovery of by-products and residues is maximised
- 3. energy recovery is maximised (utilising both heat and power)
- 4. any residues produced can be managed or disposed of in accordance with the objectives of Policy CSW 2
- 5. sites for the management of green waste and/or kitchen waste in excess of 100 tonnes per week are Animal By Product Regulation compliant (such as invessel composting or anaerobic digestion)
- 6. sites for small-scale open composting of green waste (facilities of less than 100 tonnes per week) that are located within a farm unit and the compost is used within that unit.

6.8 Policy CSW 8: Other Recovery Facilities for Non-hazardous Waste

6.8.1 One of the fundamental aims of the Plan is to reduce the amount of MSW and C&I waste being sent to non-hazardous landfill.

Proposals for additional recovery capacity will need to be designed to harness the maximum practicable quantity of energy produced.

Such capacity might be developed in conjunction with waste processing facilities on the same site, or as standalone plants where the waste is processed to produce a fuel off-site. In order to avoid the risk of under provision by double counting both fuel preparation capacity and fuel use capacity, only one of the two facility contributions will be counted towards meeting any emerging need identified by annual monitoring in future. Where fuel preparation takes place as a stand-alone activity, e.g. Mechanical Biological Treatment, the recovery contribution will only be counted as the difference between the input quantity and the output quantity unless the output fuel has a proven market. Where that is the case, if the output fuel is to be used in a combustion plant beyond Kent, then this contribution will also be counted⁸⁹.

Policy CSW 8

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⁸⁹ For example, if 100 tonnes is fed into the plant: 20 tonnes are lost as moisture; 30 tonnes are diverted as recyclate; 50 tonnes of waste is converted into material that may be suited for use as a fuel. Unless that fuel has a proven market then the contribution counted will be 50 tonnes as the remaining material may end up going to landfill. If the 50 tonnes of fuel goes to a plant built within Kent the recovery contribution will be counted at the combustion plant rather than the fuel preparation plant. If the 50 tonnes of fuel is exported beyond the county then the recovery contribution will be counted at the fuel preparation plant

Other Recovery Facilities for Non-hazardous Waste

Facilities using waste as a fuel will only be permitted if they qualify as recovery operations as defined by the Revised Waste Framework Directive¹².

When an application for a combined heat and power facility has no proposals for use of the heat when electricity production is commenced, the development will only be granted planning permission if the applicant and landowner enter into a planning agreement to market the heat and to produce an annual public report on the progress being made toward finding users for the heat.

6.9 Policy CSW 9: Non Inert Waste Landfill in Kent

- **6.9.1** The lack of response to the call for sites for non-hazardous landfill is indicative of a lack of demand by the waste industry to develop non-hazardous landfill. Nevertheless, a proposed development might come forward during the plan period and if so it will be granted permission providing it complies with both Policy CSW 9 and the DM policies in this Plan. In addition, proposed additional capacity for hazardous waste landfill will be assessed against this policy.
- **6.9.2** Following the completion of a non inert waste landfill site, the site will need to be restored and there will be a considerable period of aftercare during which such sites need to be managed in order to prevent unacceptable adverse impacts to the environment. Aftercare management can require new development in order to either prepare the site for re-use or to manage the landfill gas or leachate production. Policy DM 19 sets out the Plan's provisions with regard to restoration, aftercare and after-use.

[Policy CSW 9 remains unchanged]

[Policy CSW 10: Development at Closed Landfill Sites inc para 6.10.1 preamble remain unchanged.]

6.11 Policy CSW 11: Permanent Deposit of Inert Waste

6.11.1 The most recent capacity assessment shows that there is currently permitted capacity at permanent CD recycling sites of over 2 mtpa. It is considered more sustainable to use recycled aggregates than to extract primary aggregates. The term *CD recycling* is synonymous with the term *aggregate recycling* and the criteria for assessing further site proposals for such sites can be read in Policy CSM 8: Secondary and Recycled Aggregates in Chapter 5.

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¹² Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives

- **6.11.2** The most recent capacity assessment shows that Kent has existing consented inert waste landfill capacity that is more than sufficient to meet Kent's need for the plan period. It is known that Kent receives a lot of waste originating out of the county, particularly from London, which goes into inert waste landfill in Kent. It has been concluded that continuation of this waste import throughout the plan period at a rate of 300,000 tpa can be accommodated by the existing consented capacity.
- **6.11.3** Another important issue is that without the import of inert waste the ability to restore existing permitted mineral workings would take a lot longer. Policy CSW 11: Permanent Deposit of Inert Waste seeks to ensure that a high priority is given to using inert waste that cannot be recycled in the restoration of existing permitted mineral workings, in preference to uses where inert waste is deposited on land (e.g. bund formation or raising land to improve drainage etc).

[Policy CSW11 remains unchanged]

- 6.12 Policy CSW 12: Hazardous Waste Management
- **6.12.1** Hazardous waste arising in Kent is one of the smaller streams of waste. The management of hazardous waste is typically characterised by the following: Hazardous waste is often produced in small quantities and hazardous waste management facilities are often highly specialised with regional or even national catchment areas involving movement of hazardous waste with both waste originating in Kent going outside the county for management and hazardous waste coming into the county for management.
- **6.12.2** When hazardous waste management in Kent is viewed as a whole, net self-sufficiency in hazardous waste management is achieved. However, Kent could cease to be net self-sufficient in hazardous waste capacity if changes in the production and management profile of hazardous waste occur as follows:
 - the continued demand for disposal capacity for flue residues from Allington EfW facility
 - the likely increase in hazardous residues from air pollution control from additional EfW capacity requiring management
 - if the existing asbestos landfill closes then a significant amount of asbestos based hazardous waste will cease to be imported into the county.
- **6.12.3** The former issue is partly dealt with through the identification of a Strategic Site for Waste in Policy CSW 5. The need for management capacity of additional EfW APC residues can be addressed through Policy CSW 12 should it be required.

Any proposals for future provision for asbestos landfill capacity will be addressed using Policy CSW9.

Policy CSW 12

Hazardous Waste Management

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To maintain net self-sufficiency in the management of hazardous waste throughout the plan period, development proposals for built hazardous waste management facilities will be granted planning permission in locations consistent with Policy CSW 6, regardless of whether their catchment areas for waste extend beyond Kent.

[Policy CSW 13 remains unchanged]

6.14 Policy CSW 14: Disposal of Dredgings

6.14.1 Retaining the navigable channels within the estuaries within Kent is the statutory duty of the Port of London Authority (PLA) and the Medway Ports Authority. When the dredged materials do not consist of aggregates or cannot be accommodated within projects to enhance the biodiversity of the estuaries, then landfill is the only option currently available.

Policy CSW 14

Disposal of Dredgings

Planning permission will be granted for new sites for the disposal of dredging materials where it can be demonstrated that:

- 1. the re-use of the material to be disposed of is not practicable
- 2. there are no opportunities to use the material to enhance the biodiversity of the Kent estuaries

8 Managing and Monitoring the Delivery of the Strategy

[Changes to be made to the monitoring framework to reflect changes to the policies as set out above. This affects monitoring of policies CSW4, CSW6, CSW7, CSW8 and, CSW12]

Appendix A: Glossary

Local Plan A Local Plan is a Development Plan Document that includes planning policies for a local area. A Local Plan forms part of the Development Plan for an Area.

Appendix B: List of Replaced, Deleted and Retained Policies

All the previously adopted minerals and waste policies are replaced by the Kent MWLP 2013-30 and the Minerals Sites Plans. The Kent Minerals and Waste Plans previously in force are listed below:

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- Kent Minerals Local Plan: Brickearth (1986)
- Kent Minerals Local Plan Construction Aggregates (1993)
- Kent Minerals Local Plan Chalk and Clay (1997)
- Kent Minerals Local Plan Oil and Gas (1997)
- Kent Waste Local Plan (1998)

All of these plans were prepared before Medway Council was formed and these plans therefore covered areas which are now within Medway.

The Secretary of State for the Government Office for the South East wrote separately to both KCC and Medway Council on 21 September 2007 providing a direction on the policies in the previously adopted minerals and waste plans. Any polices not listed by the Secretary of State expired and those listed in the Direction are known as the 'saved policies'. It is the saved policies that are deleted by the Minerals and Waste Plan, and the Minerals Sites Plan once adopted. KCC and Medway Council have separate letters of direction from the Secretary of State and therefore the deletion of saved policies by KCC has no effect on Medway Council's saved policies.

In Appendix B add following text beneath the table entitled 'Saved Policies being Deleted':

Saved Policy CA6 – 'Areas of Search within which the Extraction of minerals is Acceptable in Principle' is deleted and replaced by the Kent Mineral Sites Plan

Saved Policy B1 – 'Locations Suitable in Principle for the Extraction of **Brickearth**' is deleted.

Insert table in Appendix B under section 'Saved Policies being Deleted':

Kent \	Kent Waste Local Plan 1998 Saved Policies		
W7	Locations Suitable in Principle for Inert Waste Policy deleted		
	to be Prepared for Recycling or Re-use		
W9	Locations Suitable in Principle for Waste Policy deleted		
	Separation and Transfer Proposals		
W11	Locations with Potential for EfW Proposals	Policy deleted	

Proposed modifications relating to minerals and waste safeguarding: Policies DM 7 and DM 8

7.5 Policy DM 7: Safeguarding Mineral Resources

- **7.5.1** As set out in section 5.5, it is important that certain mineral resources in Kent are safeguarded for potential use by future generations. However, from time to time, proposals to develop areas overlying safeguarded minerals resources for non—minerals purposes will come forward. The need for such development will be weighed against the need to avoid sterilisation of the underlying mineral and the objectives and policies of the development plans as a whole will need to be considered when determining proposals.
- **7.5.2** Policy DM 7 sets out the circumstances when non-minerals development may be acceptable at a location within a Minerals Safeguarding Area. This policy recognises that the aim of safeguarding is to avoid unnecessary sterilisation of resources and encourage prior extraction of the mineral where practicable and viable before non-mineral development occurs.
- **7.5.3** Proposals located in MSAs will usually need to be accompanied by a 'Minerals Assessment', prepared by the promoter, which will include information concerning the availability of the mineral, its scarcity, the timescale for the development, the practicability and the viability of the prior extraction of the mineral. Guidance on undertaking Minerals Assessments is included in the BGS Good Practice Advice on Safeguarding. Further guidance is provided through a Supplementary Planning Document. (111)
- 7.5.4 Where proposals are determined by a district/borough planning authority, the Mineral Planning Authority will work with the relevant authority and/or the promoter to assess the viability and practicability of prior extraction of the minerals resource. As necessary the Minerals Planning Authority will provide information that helps determine the economic viability of the resource.
- 7.5.5 In certain cases it is possible that the need for a particular type of development in a particular location is so important that it overrides the need to avoid sterilisation of the safeguarded mineral resource. Such cases will be highly exceptional and it will be necessary to demonstrate the overriding importance of the development, such as whether the development is of strategic national importance, and why the need cannot practically be met elsewhere.
- 7.5.6 Criterion 7 of Policy DM7 recognises that the allocation of land in adopted Local Plans for non-mineral development, such as housing, should have considered the presence of an economic mineral resource and the need for its safeguarding at this time, and, where that is shown to be the case to the satisfaction of the Mineral Planning Authority, there is no need to revisit mineral safeguarding considerations at the planning application stage. The Mineral Planning Authority and the district/borough planning authority will consider mineral safeguarding during the

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preparation of Local Plans e.g. during preparation of Strategic Housing Land Availability Assessments.

Footnote 111 The Supplementary Planning Document will be maintained by the County Council and updated as required.

Policy DM 7

Safeguarding Mineral Resources

Planning permission will only be granted for non-mineral development that is incompatible with minerals safeguarding, **(112)** where it is demonstrated that either:

- 1. the mineral is not of economic value or does not exist; or
- 2. that extraction of the mineral would not be viable or practicable; or
- 3. the mineral can be extracted satisfactorily, having regard to Policy DM9, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or
- 4. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that does not prevent mineral extraction within the timescale that the mineral is likely to be needed; or
- material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
- 6. it constitutes development that is exempt from mineral safeguarding policy, namely householder applications, infill development of a minor nature in existing built up areas, advertisement applications, reserved matters applications, minor extensions and changes of use of buildings, minor works, non-material amendments to current planning permissions; or
- 7. it constitutes development on a site allocated in the adopted development plan where consideration of the above factors (1-6) concluded that mineral resources will not be needlessly sterilised.

7.6 Policy DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities

7.6.1 It is essential to the delivery of this Plan's minerals and waste strategy that existing facilities (113) used for the management of minerals (including wharves and

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rail depots) and waste are safeguarded for the future, in order to enable them to continue to be used to produce and transport the minerals needed by society and manage its waste.

- **7.6.2** Policy DM 8 sets out the circumstances when safeguarded minerals and waste development may be replaced by non-waste and minerals uses. This includes ensuring that any replacement facility is at least equivalent to that which it is replacing and it specifies how this should be assessed.
- **7.6.3** In the case of mineral wharves the factors to be considered include the depths of water at the berth, accessibility of the wharf at various states of the tide, length of the berth, the size and suitability of adjacent land for processing plant, weighbridges and stockpiles, and existing, planned or proposed development that may constrain operations at the replacement site at the required capacity.
- **7.6.4** There also are circumstances when development proposals in the vicinity of safeguarded facilities will come forward. The need for such development will be weighed against the need to retain the facility and the objectives and policies of the development plan as a whole will need to be considered when determining proposals. Policy DM 8 sets out the circumstances when development may be acceptable in a location proximate to such facilities. The policy recognises that the aim of safeguarding is to avoid development which may impair the effectiveness and acceptability of the infrastructure.
- **7.6.5** Certain types of development which require a high quality amenity environment (e.g. residential) may not always be compatible with minerals production or waste management activities which are industrial in nature. Policy DM 8 therefore expects the presence of waste and minerals infrastructure to be taken into account in decisions on proposals for non-waste and minerals development (known as 'agents of change') made in the vicinity of such infrastructure.
- 7.6.6 Criterion 2 of Policy DM8 recognises that the allocation of land in adopted Local Plans for development, such as housing, should have considered the presence of waste management and minerals supply infrastructure and the need for its safeguarding at that time, and, where this has been shown to be the case to the satisfaction of the Mineral Planning Authority, there is no need to revisit the safeguarding considerations at planning application stage.
- 7.6.7 Further guidance on the implementation of this policy is included in a Supplementary Planning Document.

Policy DM 8

Safeguarding Minerals Management, Transportation Production & Waste Management Facilities

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Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:

- it constitutes development of the following nature: advertisement applications; reserved matters applications; minor extensions and changes of use and buildings; minor works; and non-material amendments to current planning permissions; or
- 2. it constitutes development on the site that has been allocated in the adopted development plan where consideration of the other criteria (1, 3-7) can be demonstrated to have taken place in formulation of the plan and allocation of the site which concluded that the safeguarding of minerals management, transportation production and waste management facilities has been fully considered and it was concluded that certain types non-mineral and waste development in those locations would be acceptable; or
- 3. replacement capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than to that offered by the facility that it is replacing; or
- 4. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
- 5. the facility is not viable or capable of being made viable; or
- 6. material considerations indicate that the need for development overrides the presumption for safeguarding; or
- 7. It has been demonstrated that the capacity of the facility to be lost is not required.

Replacement capacity must be at least equivalent in terms of tonnage, accessibility, location in relation to the market, suitability, availability of land for processing and stockpiling of waste (and materials/residues resulting from waste management processes) and minerals, and:

- in the case of wharves, the size of the berth for dredgers, barges or ships
- in the case of waste facilities, replacement capacity must be at least at an equivalent level of the waste hierarchy and capacity may be less if the development is at a higher level of the hierarchy

There must also be no existing, planned or proposed developments that could constrain the operation of the replacement site at the required capacity.

Planning applications for development within 250m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.

Further guidance on the application of this policy will be included in a Supplementary Planning Document.

Kent Minerals and Waste Local Plan 2013-30 Minerals Sites Plan

Early Partial Review of Kent Minerals and Waste Local Plan 2013-30 – 2018 REVISION TO LOCAL DEVELOPMENT SCHEME REVISED TIMESCALE

The Local Development Scheme sets out the County Council's programme for preparing minerals and waste planning documents. The current Local Development Scheme, which was adopted in December 2017 anticipated submission of the Plan to the Secretary of State following the pre-submission consultation in January 2019. This needs to be updated to reflect the work of the above and the anticipated date for the Regulation 19 consultation and submission.

The revised timetable for the preparation of the Minerals Sites Plan and KMWLP Partial Review, to be included in the Scheme, is set out in the table below.

Stage	Dates
Second Call for Sites	November 2016 - January 2017
Minerals Sites Options and KMWLP Partial Review Consultation (Reg 18)	December 2017 – March 2018
Pre-Submission Plan Consultation (Reg 19)	December 2018 – February 2019
Submission	March/April 2019
Independent Examination Hearing	June/ July 2019
Inspector's Report	October 2019
Adoption	December 2019



Summary of Issues Raised in comments on Regulation 18 Consultation of Early Partial Review of the Kent Minerals and Waste Local Plan

1.0 Introduction

Public consultation on proposed changes to policies in the adopted Kent Minerals and Waste Local Plan set out in the Draft Early Partial Review was undertaken between December 2017 and March 2018. The consultation concerned modifications to policies in two areas:

Strategic policies on waste management

- Policies CSW 4, CSW 7, CSW 8 (Non-hazardous waste)
- Policy CSW 12 (Hazardous waste)
- Policy CSW 14 (Disposal of Dredgings)

Policies relating to landwon minerals and minerals and waste management infrastructure safeguarding:

- Policy DM 7 (Safeguarding Mineral Resources)
- Policy DM 8 (Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities)

Eight comments were received on the proposed modifications to policies in the adopted Kent Minerals and Waste Local Plan concerning waste management. In respect of the proposed modifications to the Waste Strategy, comments were received from 7 Stakeholders including and 4 businesses and 3 organisations. The County Council received 14 responses in relation to proposed changes to the Mineral and Waste Safeguarding policy. This document provides an overview of the comments that were received, along with the Council's response. This document is based on a more detailed consultation summary document.

2.0 Comments regarding modifications to policies concerning waste management

RECO	RECOVERY CAPACITY			
Ref	Summary of comments	KCC Response		
1 1a	The data underpinning the partial review underestimates the future need for waste recovery capacity because it: - overestimates recycling performance;	Proposed revision to recycling targets have been reviewed and revised in light of current performance for Kent		
		LACW and forthcoming target rates in the EU Circular Economy Package which the UK government has committed to sign up to.		
1b	- underestimates baseline arisings due to:1. failure to account for waste arising in the South East that has not been	A spatial analysis of waste arising in the South East but not specifically identified as coming from a particular Waste Planning area has been undertaken. This confirms that the approach of only counting such waste managed at Kent sites is robust.		
	specifically identified in the Environment Agency Waste Data Interrogator as coming from a particular Waste Planning area and may therefore actually arise in Kent, as Kent is within the former South East region (known as 'non-attributed	The updated Waste Needs Assessment does consider RDF outputs from Kent sites. Planning for the management of waste above and beyond the quantities produced in Kent such as RDF transported from outside Kent to ports in Kent for export to mainland Europe is not consistent with the adopted Plan's objective of achieving net self-sufficiency. That is to say there is no expectation that the management of a quantity of waste greater than the equivalent tonnage expected to be produced in Kent should be planned for.		
	waste') and 2. the risk that Brexit may bring concerning the continuation of RDF export from Kent ports to mainland Europe;	Moreover a market intelligence review of RDF export arrangements demonstrates that the current flow of RDF from UK to mainland Europe is set to continue for a number of years and certainly beyond the initial Brexit timetable.		
1c	- underestimates future arisings due to overly conservative forecasting.	The original forecasts have been reviewed and it is considered that the growth rate used to project future waste arisings is robust. The forecast used allows for an increase in waste production while taking account of a decoupling between waste arisings and economic growth/household expenditure, as evidenced by recent trends and consistent with approaches promoted by national policy.		

Projections based on short term historical patterns of growth are likely to result in inaccurate forecasts as these will not take account of the variable rates of growth experienced over the full economic cycle of say a decade. Providing on the basis of recent sudden growth may result in over providing excess other recovery capacity which may then draw and lock waste in to a form of management that is below recycling in the Waste Hierarchy.

ISSUE: REMOVAL OF REQUIREMENT TO PREPARE A WASTE SITES PLAN INCLUDING ALLOCATIONS FOR NON-HAZARDOUS WASTE 'OTHER' RECOVERY CAPACITY

Ref	Summary of comments	KCC Response
2	The network of waste management	The updated Waste Needs Assessment confirms that there is already sufficient capacity to meet the predicted need for
	infrastructure in Kent should be	the management of the equivalent tonnage of Kent arisings through recycling/composting and Other Recovery for the
	enhanced to realise associated	Plan period; providing the desired levels of diversion of waste from non-hazardous waste landfill. In particular the
	benefits. For example, incineration	updated WNA confirms the finding that there is no identified need for additional EfW or Other Recovery capacity at this
	with energy recovery facilities	time. The WNA shows that the capped requirement for other recovery capacity in the adopted Plan has already been
	provide substantial inward	met by the construction of Kemsley SEP.
	investment, jobs and a supply of	The amended Plan allows for the development of additional capacity that results in waste being managed further up the
	renewable/low carbon power and/or	waste hierarchy. The amended Plan does not rule out the possibility of additional energy recovery capacity being
	heat.	developed, however Government policy and regulations clearly oblige the Authority to give preference to management
		further up the hierarchy wherever possible with recent suggestion of an incineration tax.

	E: REMOVAL OF REQUIREME TMENT CAPACITY	NT TO PREPARE A WASTE SITES PLAN INCLUDING PROPOSED ALLOCATIONS FOR GREEN/KITCHEN WASTE
Ref	Summary of comments	KCC Response
3	The KMWLP Partial Review	Recycling and Composting is on the same level of the waste hierarchy. The updated Review of Non-Hazardous Waste
	should acknowledge that	Recycling/Composting Capacity confirms that the predicted capacity available within Kent will exceed overall recycling and
	additional organic waste	composting requirements by a substantial margin. There is no requirement to specifically provide for a type of capacity given
	treatment capacity is	that net self sufficiency is the objective. That is to say organic waste may flow to facilities outside Kent while waste may flow
	required.	into Kent for recycling, maintaining an overall balance.
		In any event the amended Plan promotes development of additional capacity (without a cap) that will move waste up the
		hierarchy so appropriate proposals for the treatment of green and/or kitchen waste will be viewed favourably. The Plan has no
		preference between composting and anaerobic digestion capacity i.e. is technology neutral with respect to organic treatment
		capacity, which is consistent with National Policy Practice advice.
	ISSUE: REMOVAL OF REQU	JIREMENT TO PREPARE A WASTE SITES PLAN INCLUDING PROPOSED ALLOCATION FOR ASBESTOS LANDFILL
Ref	Summary of comments	KCC Response
4	A number of Waste Planning	The updated WNA indicates the need for additional asbestos landfill capacity identified in the original Needs Assessment is
	Authorities from whose area	no longer apparent. In particular the need to accommodate predicted arisings of asbestos waste arising in Kent ¹ indicates
	asbestos waste went to	that current disposal capacity will be sufficient for the Plan period. Data obtained for remaining void at Pinden Quarry
	landfill in Kent previously	Landfill suggests that, if inputs of asbestos waste were limited to an amount equivalent to the arisings in Kent over the plan
	have made representations	period then there is likely to be sufficient capacity. It is therefore considered that the identification of a specific additional
	expressing concern about	landfill for hazardous waste (asbestos CDEW) to manage predicted Kent arisings (c 7,000tpa) is not justified. If industry
	the removal of the	were to pursue a further site in future, then the criteria-based policy CSW9 (Non Inert Landfill) would allow such a site to be
	commitment to allocate a site	permitted (subject to compliance with development management policies).
	in Kent for asbestos landfill.	
		(It should be noted that the approach taken in the adopted KMWLP was informed by the fact that a proposal to include an
		extension to Pinden Quarry Landfill as an allocation was put forward by the operator during the first call for sites in 2012.
		extension to i inden adding Editalin as an allocation was put forward by the operator during the first sail for sites in 2012.

¹ BPP Consulting Waste Needs Assessment 2018

This is on the basis that	However, no such proposal was put forward in response to the second call for sites in 2016-2017. Nor has an application been forthcoming)
hazardous waste facilities have a wider than local catchment area due to their specialist nature.	With respect to the aspiration for maintaining net self sufficiency in hazardous waste management capacity overall this will be met by the Plan's provision of additional hazardous waste landfill capacity (for air pollution control residues) at Norwood Farm. Moreover provision of hazardous waste management capacity is not normally a matter targeted for local self sufficiency. Hence the current objective of seeking to be self-sufficient for this waste stream goes above and beyond national policy expectation.
	A review of alternative outlets utilised by WPAs expressing concerns indicates that there are a variety of alternative outlets available to accept waste previously accepted at Pinden Quarry, continued availability of which is for those authorities to investigate and establish as part of their waste planning obligation.

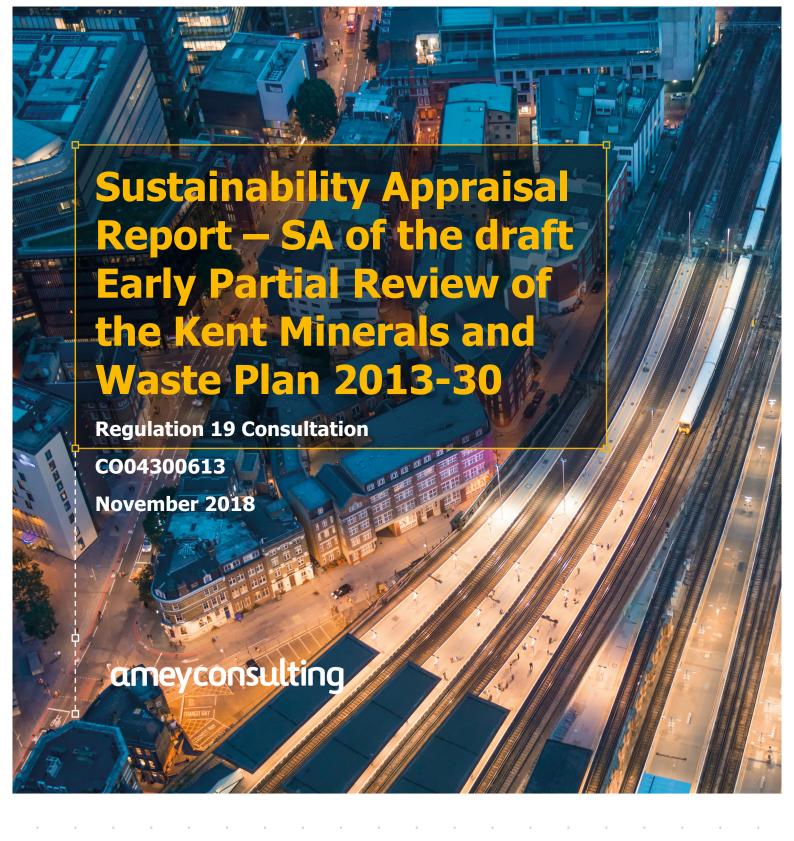
3.0 Comments regarding modifications to policies concerning landwon minerals and minerals and waste management infrastructure safeguarding

ISSUE	ISSUE: CHANGES TO POLICIES DM7 AND DM8 NOT ACCEPTABLE				
Ref	Summary of comments	KCC Response			
5	The new wording moves responsibility	Minerals considerations should be assessed as any other constraint as part of the Local Plan process. Local			
	for assessments to the Local Authority	Authorities should require developers to submit a minerals assessment as they would a Flood Risk Assessment			
		and send to KCC's Minerals and Waste team for appraisal.			
6	The proposed wording may have	Mineral safeguarding is an important planning consideration in the determination of planning applications . The			
	effects on deliverability of housing	NPPF states that safeguarded minerals should not be needlessly sterilised. Minerals assessments would be used			
	allocations in Local Plans; undermine	to assess whether a site should be exempt from safeguarding, is appropriate for prior extraction or should remain			
	Districts' 5-year housing supply and the	safeguarded. The revised policy wording will ensure that the Mineral Safeguarding matters are properly			
	viability of housing provision	considered in decision making.			
		Prior extraction and safeguarding will also help the sustainability of housing delivery over plan periods, as it			
		ensures that the required materials to build the planned houses will not be lost.			
7	Inconsistencies need rectifying where	The proposed policy wording seeks to address the inconsistency in interpretation . The need to review MSAs can			
	some parts of the Minerals Safeguarding	be addressed as part of the annual monitoring process			
	Areas were amended to avoid housing				
	allocations whereas others did not. The				

	MSAs should be annually reviewed as	
	stated in the MWLP to rectify this	
8	The proposed caveat that allocated sites should consider mineral and waste safeguarding should not be applied	The Inspectors comments stated that the original detail in the draft plan would not be needed as it makes the plan 'overly wordy'. Recent evidence has shown this to be erroneous.
	retrospectively as these changes would contradict the inspector's modifications at the MWLP's examination that safeguarding policies are not	
	retrospective	
9	These changes would contradict the inspector's findings at the recent Maidstone Borough Local Plan's examination, that certain allocations within it did not require minerals assessment due to the lack of market for the mineral	Policy DM7 states that sites are exempt from safeguarding if the promoter can demonstrate that the mineral is not economically viable.
10	KCC have failed to engage with Local Planning Authorities on how successfully applying the safeguarding criteria in their development management decisions would work in practice.	The County Council has prepared a Supplementary Planning Document(SPD) on Safeguarding to address this matter. Prior to its preparation, a workshop was held with Borough Council's in Kent. In light of comments received, the SPD is to be updated and agreed through Statements of Common Ground. Upon request, individual discussions on safeguarding matters on a case by case basis take place between County Council and Borough Council offices.
	KCC should also engage and be engaged earlier in the Local Plan process to determine whether a site is acceptable in Minerals Planning terms	
11	Such a change in policy could render local plan's within Kent 'out of date'	This should not be the case. Local Plans in any event, are required to be reviewed every 5 years. Failure to take safeguarding matters into account in decision and plan making risks unsound planning decisions.

12	Kent County Council should produce	Published as part of Partial Review documents.
	evidence providing details of cases	
	whereby it considers the policies to have	
	been ineffective and why	
13	The wording should be amended to: "(7)	The current wording makes it clear that one of the criteria being met can allow the site to be exempt.
	it constitutes development on a site	
	allocated in the adopted development	
	plan where consideration of any one of	
	the above factors (1-6) concluded that	
	minerals resources will not be	
	needlessly sterilised.	
14	DM8 wording should be amended to:	The current wording makes it clear that one of the criteria being met can allow the site to be exempt.
	"(2) it constitutes development on the	
	site that has been allocated in the	The suggested "Has demonstrably confirmed that the specified type of non-mineral and waste development in
	adopted development plan where	those locations would be acceptable" does not provide enough protection to adequately safeguard a site.
	consideration of any one of the above	
	factors can be documented to have	
	taken place in the formulation of the	
	plan and/or allocation of the site has	
	demonstrably confirmed that the	
	specified which conclude that the	
	safeguarding of minerals management,	
	transportation production and waste	
	management facilities has been fully	
	considered and it was concluded that	
	certain type of non-mineral and waste	
	development in those locations would be	
	acceptable."	
15	The Port of London Authority refer to	These comments were considered by the Inspector at the KMWLP Examination. They were incorporated into the
	their comments at the Examination of	Plan at the Main Modifications stage
	the MWLP.	

16	DM7, criteria 7 should be amended to "It	The current wording makes it clear that one of the criteria being met can allow the site to be exempt. Does not
	constitutes development on a site	provide enough protection to adequately safeguard a site if minerals planning points have not been taken into
	allocated in the adopted development	account at allocation.
	plan and the applicant is able to	
	demonstrate compliance with criteria 1-6	
	above."	
17	DM8, criteria 2 should be amended to "It	The current wording makes it clear that one of the criteria being met can allow the site to be exempt. Does not
	constitutes development on a site	provide enough protection to adequately safeguard a site if minerals planning points have not been taken into
	allocated in the adopted development	account at allocation.
	plan and the applicant is able to	
	demonstrate compliance with critera1, 3-	
	7 above".	





Document Control Sheet

Project Name:	Regulation 19 Consultation
Project Number:	CO04300613
Report Title:	Sustainability Appraisal Report – SA of the draft Early Partial Review of the Kent Minerals and Waste Plan
Report Number:	SR2

Issue Status/Amendment	Prepared	Reviewed	Approved
Rev 0	Name:	Name:	Name:
1 1	Taylor, Jenefer	Jenefer Taylor	Mike Comerford
1	Signature:	Signature:	Signature:
	Hilany Livesey	Ataylor	
1 1 1 1	Date: 1/11/18	Date: 15/11/18	Date: 19/11/18
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Executive Summary

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Early Partial Review preparation process. This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation). The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The Early Partial Review seeks to amend the KMWLP in several respects:

- The adopted Plan identifies a shortfall in capacity for some types of waste facility over the Plan period, however a review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. Through the Early Partial Review there will be no commitment by Kent County Council to prepare a Waste Sites Plan.
- Two policies in the KMWLP set out criteria to allow development that may affect safeguarded sites
 to proceed in certain prescribed circumstances. These will be amended by the Early Partial
 Review to ensure that the Council's safeguarding approach is effective.
- The Early Partial Review proposes to add a clause providing for assurances that the Strategic Site
 Allocation at Norwood Quarry can be suitably restored in the event that the void space may no
 longer be used for management of flue dust residues. In addition, it is proposed to delete the
 requirement for an assessment of alternative management methods for flue ash given that
 significant tonnages are already being managed through other treatment routes.

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives as set out in Table 1 of the report. The Early Partial Review has been appraised against this set of sustainability objectives and the findings of that appraisal are as follows.

The Early Partial Review will promote increased reuse, recycling and recovery, which will have climate change benefits and support the move towards a circular economy.

Ensuring restoration of the landfill in the event that insufficient flue-ash is available to complete the landform will help to improve the landscape impacts of the site and remove any amenity impacts on communities from an unrestored site. Restoration plans include biodiversity benefits and these would be secured earlier than with original plans.

Promotion of energy recovery and heat will reduce emissions of greenhouse gases, helping to attenuate the effects of climate change, particularly the pressures resulting on biodiversity and communities including from flood risk. Energy recovery will also recover economic benefits from waste and provide heat for homes and

communities.

Improved safeguarding of mineral resources will help to ensure the availability of aggregates to support housing construction to sustain communities and support economic/industrial activity, although encouraging use of a non-renewable resource is not sustainable. Improved safeguarding of infrastructure for minerals and waste management and transport will also help to support communities and economic/industrial activity and help to ensure the economic transport of materials and availability of sustainable modes of transport.

The SA has considered whether there is scope for making recommendations for measures to prevent, reduced and as fully as possible offset any significant adverse effects of the Early Partial Review. In practice, no significant adverse effects have been identified and therefore no mitigation recommendations are made.

The SA is required to appraise reasonable alternatives to the Early Partial Review as proposed. The reasonable alternatives that have been identified largely derive from a 'do nothing' option, in other words, not to make the changes proposed by the Early Partial Review. The following have been identified as reasonable alternatives to the Early Partial Review, here referred to as 'options'.

Option A

To allocate land for waste facilities as envisaged in the adopted KMWLP;

Option B

- Option B1: To retain the targets for recycling, recovery and landfill in policy CSW 4 of the adopted KMWLP;
- Option B2: To retain targets for recycling and reduce targets for landfill in policy CSW 4 of the adopted KMWLP;

Option C

Not to strengthen safeguarding in policies DM 7 and DM 8.

These alternatives have been appraised appraised against this set of sustainability objectives and the findings of that appraisal are set out in the report.

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1. Non-Technical Summary

1.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Early Partial Review preparation process. This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation). SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

1.2. What is the plan seeking to achieve?

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The adopted Plan identifies a shortfall in capacity of the following types over the Plan period (to 2030):

- Waste recovery capacity energy from waste and organic waste treatment;
- Hazardous waste (due to the identified need for additional capacity to allow for the continued landfilling of asbestos)
- Disposal of Dredgings.

Policies CSW 7, CSW 8, CSW 12 and CSW 14 of the KMWLP state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls. A review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. Through the Early Partial Review there will be no commitment by Kent County Council to prepare a Waste Sites Plan.

Policies DM 7 and DM 8 set out criteria to allow development that may affect safeguarded sites to proceed in certain prescribed circumstances. Policies DM 7 and DM 8 will be amended by the Early Partial Review to ensure that the Council's safeguarding approach is effective.

Policy CSW 5 sets out the criteria to be applied to the assessment of any forthcoming application relating to the Strategic Site Allocation at Norwood Quarry. The Early Partial Review proposes to add a clause providing for assurances that the proposed site can be suitably restored in the event that the void space may no longer be used for management of flue dust residues due to a possible change in government policy. Currently national policy allows landfilling of such waste under a special derogation from the Landfill Directive waste acceptance criteria requirements. This has been subject to review in the past and may change in future. In addition, it is proposed to delete the requirement for an assessment of alternative management methods for flue ash given that significant tonnages are already being managed

through other treatment routes.

In parallel with the development of the Early Partial Review, Kent County Council is also developing a Minerals Sites Plan. This has identified three sites in the county as being suitable for new mineral extraction.

1.3. What's the situation now and how would it change without the plan (sustainability 'baseline')?

The following is a summary of the sustainability baseline characteristics in Kent.

Environmental baseline

- Kent is considered to be one the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe.
- Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway UA), the Isle of Thanet, the Stour Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 8.5% of the county. The county contains c.10% of England's ancient woodland.
- The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to builtdevelopment or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- Analysis at the County level has informed the location of 16 Biodiversity Opportunity Areas (BOAs) across Kent covering 40% of the land area (BOAs cover 35% of the South East).
- Since 2008 there has been a reduction in carbon dioxide emissions of 0.8 tonnes per capita.
 Nonetheless, this figure remains higher than regional and national emission levels.
- In 2010 it is estimated that 1050 early deaths occurred as a result of just PM2.5 air pollution across Kent & Medway [KMAQM, 2015]
- Kent is considered to be the most at risk lead local flood authority in England. Flooding has a significant impact on residents and the economy, with such effects predicted to worsen due to climate change.
- In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption. [EA, 2012]

Social baseline

- Kent had an estimated population of 1,466,500 in mid-2011. By 2021 the population of Kent is projected to increase by 9.4% from 2012. The age group with the greatest projected percentage change in population is 65+ (21.2%).
- In mid-2011, Kent had the largest rural population of any county in the South East (29%) and identified problems of 'rural deprivation', e.g. associated with access to services, facilities and housing affordability.

- In terms of the 'Index of Multiple Deprivation', Kent ranks within England's least deprived third of authorities. However, significant areas within Kent are amongst England's most deprived 20%. Life expectancy is 8.2 years lower for men and 4.5 years lower for women in the most deprived areas of Kent than in the least deprived areas.
- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. About 18.4% of Year 6 children are classified as being obese, lower than the average for England. However, estimated levels of adult obesity are worse than the England average.
- Climate change projections highlight an increase in risk to people from flooding; and hotter and sunnier summers leading to public health risks.

Economic baseline

- In 2011, the Gross Domestic Household Income (GDHI) in Kent was £16,855, 5.1% above the UK average, while the South East region was 12.8% above the UK average.
- 2011 was the first year since 2008 that the 'birth' of enterprises in the Kent exceeded the number of 'deaths'.
- During the period October 2011 to September 2012, the employment rate for residents of Kent was 71.1%, a lower figure than that for the South East (74.6%) and close to that for England (70.7%).
- In Kent, the unemployment rate for October 2011 to September 2012 was 7.4% of the population aged 16 years and over; greater than the rate for the South East (5.8%) and close to the rate for England (7.9%).
- The 'public administration, education and health' sector employs the highest proportion of persons aged 16 to 64 (30.7%). Agriculture and fishing employs the lowest proportion of the population aged 16 to 64 (1.6%). These are also the lowest / highest employers at regional and national levels.

How would the baseline would change without the Early Partial Review?

There is a degree of uncertainty about how the baseline might change without the adoption of the Early Partial Review. Developments will still be required to comply with the development management policies of the KMWLP. This includes policies on the protection and enhancement of: biodiversity value, landscape, Green Belt, heritage assets, the water environment, health and amenity (including air quality) and transportation. Long term trends in environmental quality are likely to continue.

However, without the Early Partial Review there is the potential for oversupply in waste capacity as policies in the KMWLP identify a capacity need. This may result in waste being transported from outside the county to provide inputs to waste facilities which will have which will have adverse effects on transport networks, air quality and greenhouse gas emissions.

Without the Early Partial Review it is possible that some mineral resources will be lost to other developments through weaker safeguarding policy. Kent may be less able to provide enough minerals to support the expected future demand for minerals from construction and industry. In such an event, there would be a need to source minerals from elsewhere. This may mean importing minerals from other parts of the country, which will have adverse effects on transport networks, air quality and cost. Alternatively, increased quantities may need to be secured from secondary and recycled aggregates and/or marine dredged aggregates. If sufficient minerals of the right type cannot be found, construction and industrial growth may

be checked. This could lead to insufficient homes being provided with adverse effects on people and communities. Minerals in Kent would not provide sufficient material to support economic growth and industrial activity, in which case employment levels could reduce and GDP and household incomes may fall.

Loss of transport and other infrastructure for minerals and waste without the Early Partial Review is likely to result in materials being transported further with consequent impacts on air quality and transport networks and could result in the loss of sustainable transport modes. This would increase transport and material costs which would adversely affect the profitability of industry. It would also result in loss of capacity and increased demand for new sites.

Without the adoption of the Early Partial Review, emissions of carbon dioxide will be greater than with its adoption. The aim is to reduce the targets for the percentage of waste going to landfill and to manage it at higher levels of the waste hierarchy and to promote the recovery of energy from waste. Without this, there could be increased climate change effects including flooding with risks for communities, wildlife and habitats. Other climate change pressures may be increased with effects on biodiversity and communities, including increased temperatures and more frequent extreme weather events.

Landscape in the locality of the strategic site for waste could be negatively affected if the Early Partial Review is not adopted. If insufficient flue ash is available to restore the landfill, the landfill may not be restored in line with original plans which could have lasting landscape impacts and may affect the amenity of nearby residents.

The social baseline is unlikely to be affected without the adoption of the Early Partial Review. Population, levels of deprivation and health are unlikely to be significantly different with or without the Early Partial Review.

1.4. Characteristics of areas likely to be significantly affected

The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by the Early Partial Review. In deciding which areas are likely to be significantly affected, the SA has considered whether there is a spatial element to the proposed policy changes and therefore whether some parts of the county will be particularly affected. There is only one policy with a spatial element and that is the policy relating to Norwood Quarry, the strategic site for waste. The appraisal of the change to this policy has not identified any significant effects arising from change to the policy. It is therefore concluded that there are no areas likely to be significantly affected.

1.5. Areas of Particular Environmental Importance

A Habitats Regulations Assessment has been undertaken for the Early Partial Review¹. This identified that impacts from one strategic site, Norwood Quarry Extension, requires consideration because of the potential for impact on two designated sites:

- Medway Estuary and Marshes SPA and Ramsar;
- Swale SPA and Ramsar

The characteristics of these designated sites are described in detail in Section 3.6 of the main report.

1.6. SA Framework and Sustainability Objectives

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives (sustainability objectives) as set out in Table 1. Following due diligence in terms of the context and baseline conditions, the Framework and Sustainability Objectives for the SA of the Early Partial Review has been developed using that produced by URS (2013). The relationship between the 2010 Scoping and 2013 SA Report objectives is presented in Table 1 below, which also expands on the detail of the objectives and the additions made following the 2017 Scoping exercise and review of the NPPF 2018 and the 25 Year Environment Plan.

Susta	inability Objectives	Corresponding SO	Detail – including additions resulting from MPS SA Scoping (Amey,		
(URS, 2013) (Scott Wilson, 2010)		(Scott Wilson, 2010)	2017) and additions resulting from review of NPPF and 25YEP		
1	Biodiversity	SO2	Ensure that development will not impact on important elements of		
I I	I I		the biodiversity resource and where possible contributes to the		
I I	i i	I I	achievement of the Kent BAP and other strategies		
I I	I I	I I	– Add to the biodiversity baseline by creating opportunities for		
I I	I I		targeted habitat creation (which, ideally, contributes to local or		
I I			landscape scale habitat networks).		
	1		Avoid hindering plans for biodiversity conservation or		
			enhancement		
			 Support increased access to biodiversity 		
2	Climate change	SO5	Address the causes of climate change through reducing emissions		
I I	i i	I I	of greenhouse gases through energy efficiency and energy		
I I	I I	I I	generated from renewable sources		
I I	1		- Promote sustainable design and construction of facilities and		
!	1		support wider efforts to reduce the carbon footprint of minerals		
	 		operations.		

¹ Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 & Kent Mineral Sites Plan: Appropriate Assessment, Ecus Ltd, November 2018

3	Community and	S09, S07	Support efforts to create and sustain sustainable communities,
	well-being		particularly the improvement of health and well-being; and support
			the delivery of housing targets
	I I	1	– Help to redress spatial inequalities highlighted by the Index of
	I I	I I	Multiple deprivation.
l I	I I	I I	– Help to tackle more hidden forms of deprivation and exclusion,
l I	I I	I I	such as that which is experienced in rural areas and particular
 		1	socio-economic groURS within communities.
 	1	1	– Ensure that the necessary aggregates are available for building,
		1	and that the necessary waste infrastructure is in place to support
			housing growth
!	I		– Ensure that minerals development does not contribute to poor air
 	I I	I I	quality particular reference to PM2.5.
l I	I I	I I	– Protect and enhance public rights of way and access
l I		1	– Protect local green space
4	Sustainable	SO11	Support economic growth and diversification
	economic growth		– Support the development of a dynamic, diverse and knowledge-
 			based economy that excels in innovation with higher value, lower
l I	I I	1	impact activities
l I	I I	I I	– Stimulate economic revival and targeted employment generation
l I	I I	I I	in deprived areas
5	Flood risk	SO1	Reduce the risk of flooding and the resulting detriment to public
!			wellbeing, the economy and the environment
!	i	i	– Ensure that development does not lead to increased flood risk on
l I	I I	I I	or off site
 	I I	I I	– Seek to mitigate or reduce flood risk through developments that
l I	1	1	are able to slow water flow and promote groundwater recharge
6	Land	S08	Make efficient use of land and avoid sensitive locations
			– Make best use of previously developed land
!			- Avoid locations with sensitive geomorphology
!	i I	i I	– Recognise the economic and other benefits of the best and most
I I	I I	1	versatile agricultural land
 	I I	I I	- Prevent inappropriate development in the Green Belt
7	Landscape and	SO3	Protect and enhance Kent's countryside and historic environment
	the historic	1	- Protect the integrity of the AONBs and other particularly valued or
!	environment	1	sensitive
			landscapes
	1	1	– Take account of the constraints, opportunities and priorities
l I	1	1	demonstrated through landscape characterisation assessments and
	I I	I I	other studies at the landscape scale.
		~	

·			
i	1	1	- Protect important heritage assets and their settings, as well as
I I	I I	I I	take account of the value of the character of the wider historic
I	I I	1	environment
8	Transport	SO6	Reduce and minimise unsustainable transport patterns and facilitate
1	!	1	the transport of minerals and waste by the most sustainable modes
1	1	1	possible
	1		- Minimise minerals and waste transport movements and journey
i	1		lengths; and encourage transport by rail and water.
i	i I	i I	– Ensure that minerals and waste transport does not impact on
1	1	I I	sensitive locations, including locations already experiencing
I I	I I	I I	congestion and locations where planned growth or regeneration is $ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ $
1	1	1	reliant on good transport networks.
9	Water	SO4	Maintain and improve the water quality of the Kent's rivers, ground
	I	1	waters and coasts, and achieve sustainable water resources
	I	1	management
i	i I	i I	– Ensure that minerals and waste development seeks to promote
I I	1	I I	the conservation of water resources wherever possible particular
I I	I I	I I	reference to abstraction.
I I	I I	I I	- Avoid pollution of ground or surface waters, particularly in areas
I	1	1	identified as being at risk or sensitive
Scope	ed out of URS	SO10 [waste]	<u></u>
(2013	3)	I I	

Table 1 SA Framework

1.7. Likely Significant Effects of the Pre-Submission Early Partial Review

The SA has appraised each of the policy amendments which are proposed by the Early Partial Review. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

The detailed findings of the SA of policy changes are set out in Appendix B and summarised below.

				Sustaina	bility O	bjectiv	е		
Policy	1 Biodiversity	2 Climate change	3 Community and wellbeing	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the historic environment	8 Transport	9 Water
CSWS 4	+	0	+	+	0	0	0	?	0
CSW 5	+	0	?	0	0	0	+	0	0
CSW 6	0	0	0	0	0	0	0	0	0
CSW 7	+	0	+	+	0	0	0	?	0
CSW 8	+	+	+	+	+	0	0	0	0
CSW 12	0	0	0	0	0	0	0	0	0
CSW 14	0	0	0	0	0	0	0	0	0
DM 7	0	0	++	++/-	0	0	0	0	0
DM 8	0	0	+	++/-	0	0	0	+	0
Overall impacts	+	+	++	++/-	+	0	+	+	0

Table 2: Summary of Findings of SA of Partial Review Overall

Increased reuse, recycling and recovery will have climate change benefits and support the move towards a circular economy.

Ensuring restoration of the landfill in the event that insufficient flue-ash is available to complete the landform will help to improve the landscape impacts of the site and remove any amenity impacts on communities from an unrestored site. Restoration plans include biodiversity benefits and these would be secured earlier than with original plans.

Promotion of energy recovery and heat will reduce emissions of greenhouse gases, helping to attenuate the effects of climate change, particularly the pressures resulting on biodiversity and communities including from flood risk. Energy recovery will also recover economic benefits from waste and provide heat for homes and communities.

Improved safeguarding of mineral resources will help to ensure the availability of aggregates to support housing construction to sustain communities and support economic/industrial activity, although encouraging use of a non-renewable resource is not sustainable. Improved safeguarding of infrastructure for minerals and waste management and transport will also help to support communities and economic/industrial activity and help to ensure the economic transport of materials and availability of sustainable modes of transport.

1.8. Recommendations for Mitigating Adverse Effects

The SA has considered whether there is scope for making recommendations for measures to prevent, reduced and as fully as possible offset any significant adverse effects of the Early Partial Review. In practice, no significant adverse effects have been identified and therefore no mitigation recommendations are made.

1.9. Reasons for Selecting Alternatives Dealt With

The SA is required to appraise reasonable alternatives to the Early Partial Review as proposed. The reasonable alternatives that have been identified largely derive from a 'do nothing' option, in other words, not to make the changes proposed by the Early Partial Review. The following have been identified as reasonable alternatives to the Early Partial Review, here referred to as 'options'.

Option A

To allocate land for waste facilities as envisaged in the adopted KMWLP;

Option B

- Option B1: To retain the targets for recycling, recovery and landfill in policy CSW 4 of the adopted KMWLP;
- Option B2: To retain targets for recycling and reduce targets for landfill in policy CSW 4 of the adopted KMWLP;

Option C

Not to strengthen safeguarding in policies DM 7 and DM 8.

Option A would be to produce a Waste Sites Plan as originally envisaged in the KMWLP. It would be possible for Kent County Council to identify and allocate sites as suitable for waste-related development even though no capacity gap has been identified and therefore this has been appraised as a reasonable alternative.

Options B1 and B2 are alternative waste hierarchy targets to those proposed by the Early Partial Review. The Early Partial Review proposes a reduced target for landfill and recycling and an increased target for other recovery. It would be reasonable to retain the targets set by the adopted KMWLP, as these were considered reasonable when it was adopted in 2016. However, a reduced recycling target in the Early Partial Review could be considered a reduction in ambition for sustainable waste management, while retaining a higher landfill target in the adopted KMWLP could similarly be seen as insufficient ambition for sustainable waste management. A third option would therefore be to avoid both of these situations, retaining the recycling ambition of the KMWLP and reducing the landfill target to promote more sustainable waste management.

Option C constitutes the 'do nothing' option in regard to safeguarding.

The 'do nothing' option in respect of the restoration of the landfill at Norwood Quarry is not considered a reasonable alternative to that proposed in the Partial Review. To leave the landfill unrestored would not be an acceptable approach to waste management activity.

1.10. Methodology

The SA has appraised each of the changes to policy proposed by the Early Partial Review, as well as the alternatives described in the previous section. The appraisal was done by assessing each policy amendment and each alternative against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	
Significant adverse effect	-
Uncertain effect	?

Further details on the methodology, including assumptions made, are given in Section 5 of the main report. Information on the difficulties encountered is provided in Section 4 of the main report. These relate to the lack of available data in some instances, lack of quantification and uncertainties about the scale and nature of some impacts.

1.11. Monitoring Recommendations

The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of the Early Partial Review as proposed. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of the Early Partial Review. The recommended indicators should be incorporated into the Annual Monitoring Report for the KMWLP and are set out in Section 7.

2. Introduction

2.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 (KMWLP). This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation). SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

2.2. The SA Process

It is a legal requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

The Regulations require that a report - which for the purposes of SA is known as the 'SA Report' – is published for consultation alongside the Pre-Submission Consultation document of the Early Partial Review and then taken into account, alongside consultation responses, when finalising the Early Partial Review. Essentially, the SA Report must 'identify, describe and evaluate' the likely significant effects of implementing the Early Partial Review, and 'reasonable alternatives' to the Early Partial Review as proposed.

In-line with regulatory requirements, Sustainability Appraisal has already been undertaken throughout the drafting and adoption of the KMWLP (most recently: URS, 2013 and Addenda). Kent are currently developing the Early Partial Review which will amend certain policies in the KWMLP: This SA Report has informed the development of the policy amendments proposed in the Pre-Submission Early Partial Review to go forward to Regulation 19 consultation by undertaking an assessment of the likely effects of the proposed changes.

A scoping exercise has been undertaken, leading to the production in November 2017 of a Scoping Report which explains the rationale behind the SA Framework selected for this Early Partial Review SA. This SA Report has been produced in order to address the statutory appraisal questions as detailed in Table 3, to ensure that the policy amendments have been assessed, any matters of significance noted and mitigation proposed if appropriate.

APPRAISAL QUESTION	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE (The report must include)
1) What is the plan seeking to achieve?	"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" (Annex I(a))
2) What's the sustainability context?	"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" (Annex I(a)) "the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
3) What's the situation <u>now</u> ?	"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex I(b)) "the environmental characteristics of areas likely to be significantly affected" (Annex I(c))
4) What would the situation be without the plan?	"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex $I(b)$)
5) What are the key issues that should be a particular focus of the appraisal?	"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC" (Annex I(d)) (Note impacts on European sites will be specifically addressed through Habitats Regulations Assessment)
6) How has the plan developed up to this point (including the influence of SA)?	"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex I(h)) "the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
7) How has the appraisal at this current stage been undertaken?	"an outline of the reasons for selecting the alternatives dealt with, and a description on how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex I(h))
8) What are the appraisal findings / recommendations at this current stage?	"the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors" (Annex I(f)) "the measures envisaged to prevent, reduce and as fully as possible offset any
	significant adverse effects on the environment of implementing the plan or programme" (Annex I(g))
9) How might we monitor the plan's impacts?	"a description of the measures envisaged concerning monitoring" (Annex $I(i))$

Table 3Questions that must be answered (sequentially) within the SA Report

2.3. Compliance with the SEA Directive and Regulations

The Early Partial Review is subject to the requirements of the European Union's Directive on the Environmental Assessment of Certain Plans & Programmes 2001/42/EC (the SEA Directive) and the domestic legislation through which the Directive has been transposed into law in England and Wales (the Environmental Assessment of Plans & Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633).

The SA of the Early Partial Review was designed and undertaken so as to meet the legal requirements for the environmental assessment of plans. Throughout the report the term 'Sustainability Appraisal' should be interpreted as encompassing the SA process as required under the Planning & Compulsory Purchase Act 2004 and the Strategic Environmental Assessment process as required under the European Directive and domestic Regulations on the environmental assessment of plans and programmes.

The following table indicates the components of the SA Report that make up the Environmental Report, as required by domestic and European law on the environmental assessment of plans.

Requirements for Environmental Report	Component of
	SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3.1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 3.3
c) The environmental characteristics of areas likely to be significantly affected;	Section 3.5
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sections 3.3 and 3.6
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Section 3.2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 6 and Appendix B
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 6.1

Requirements for Environmental Report	Component of
	SA Report
h) An outline of the reasons for selecting the alternatives dealt	Sections 4.2 and
with, and a description of how the assessment was undertaken	5.2.3
ncluding any difficulties (such as technical deficiencies or lack of	
know-how) encountered in compiling the required information;	
) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 7
) a non-technical summary of the information provided under the above headings	Section 1

Table 4 Requirements of SEA Directive and Compliance of SA Report

3. The Scope of the Sustainability Appraisal

3.1. What is the plan seeking to achieve?

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The KMWLP is a high level document planning to 2030 which:

- sets out the vision and strategy for mineral provision and waste management in Kent;
- contains a number of development management policies for evaluating minerals and waste planning applications;
- considers strategic site provision for all minerals and waste management facilities; and identifies two
 areas where key (strategic) mineral and waste development should take place.

The KMWLP has been fully assessed previously by an earlier SA Report².

The adopted Plan identifies a shortfall in capacity of the following types over the Plan period (to 2030):

- Waste recovery capacity energy from waste and organic waste treatment;
- Hazardous waste (due to the identified need for additional capacity to allow for the continued landfilling of asbestos)
- Disposal of Dredgings.

As a consequence, policies CSW 7, CSW 8, CSW 12 and CSW 14 state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls.

A review³ of the future needs for waste management facilities in Kent has been undertaken and this has concluded that there is now no need for the development of this additional capacity. This is for the following reasons:

- Energy recovery capacity: the additional capacity at Kemsley Sustainable Energy Plant (SEP) is now confirmed.
- Hazardous waste: Due to the lack of need for additional capacity to allow for the continued landfilling
 of projected arisings of asbestos from Kent within Kent.

² Sustainability Appraisal of the Kent Minerals and Waste Local Plan, Amey, July 2014; and Addenda

³ BPP Consulting Kent Waste Needs Assessment 2018 Specifically: *Non Hazardous Waste Recycling/Composting Capacity Requirement, September 2018; Non Hazardous Waste Recycling/Composting Capacity Requirement, September 2018; and Hazardous Waste Needs Assessment, September 2018.*

• Disposal of Dredgings: No clear need identified by Port of London Authority (PLA) (the responsible navigation authority) for a specific site.

In addition, while there remains an identified need for organic waste treatment capacity, it is considered that adopted policy in the KMWLP is sufficiently permissive and positive enough for applications to be encouraged to come forward without the allocation of specific sites. It should also be noted that when recycling and composting are considered together there is no predicted shortfall in capacity.

The review and modification of the policies mentioned above will ensure the development plan for Kent, insofar as policies relating to provision for waste management are concerned, is relevant and effective, reflecting changes in circumstances.

Policies DM 7 and DM 8 set out criteria to allow development that may affect safeguarded sites to proceed in certain prescribed circumstances. Policies DM 7 and DM 8 will be amended by the Early Partial Review to ensure that the safeguarding is not unduly rigid in its application.

Policy CSW 5 sets out the criteria to be applied to the assessment of any forthcoming application relating to the Strategic Site Allocation at Norwood Quarry. The Early Partial Review proposes to add a clause providing for assurances that the proposed site can be suitably restored in the event that the void space may no longer be used for management of flue dust residues due to a possible change in government policy. Currently national policy allows landfilling of such waste under a special derogation from the Landfill Directive waste acceptance criteria requirements. This has been subject to review in the past and may change in future. In addition, it is proposed to delete the requirement for an assessment of alternative management methods for flue ash given that significant tonnages are already being managed through other treatment routes.

In parallel with the development of the Early Partial Review, Kent County Council is developing a Minerals Sites Plan. The KMWLP did not allocate specific sites suitable for minerals and waste development except for two strategic sites - one for cement production (and related mineral reserves) at Holborough in the Medway Valley and one for hazardous waste disposal at Norwood Quarry on the Isle of Sheppey. The KMWLP identified that the specific sites for minerals developments would be set out in the separate Minerals Sites Plan. The selection of sites will be based on the policies of the KMWLP and sites proposed for development will be required to comply with the policies of the KMWLP. The Minerals Sites Plan has been subject to SA and the results of this are set out in a separate SA Report.

The Kent Municipal Waste Management Strategy sets objectives for the management of municipal waste. In particular, it sets targets for the percentage of household waste arisings that will be recycled or composted and landfilled. The KMWLP seeks to support implementation of this Strategy by providing land use policies to permit and manage waste developments that will enable the objectives and targets of the Strategy to be achieved.

The government has published the National Planning Policy Framework (July 2018), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development. The Early Partial Review has been prepared in compliance with the National Planning Policy Framework (NPPF).

The current piece of work is to undertake SA of the draft Early Partial Review to inform Regulation 19 consultation on the Pre-submission draft of the Early Partial Review. Rather than being a strategy document in itself, the Early Partial Review makes amendments to certain policies and supporting text of the KMWLP. meet.

3.2. What's the sustainability context?

URS answered this question in 2013 primarily by reviewing the National Planning Policy Framework (NPPF) and considering the contextual messages established through other plans, policies, strategies and initiatives. Although NPPF (2012) was subsequently augmented by the publication of various Planning Guidance, the themes of importance largely remain the same. Where a new aspect of context has been identified, this is identified in the following paragraphs and has been incorporated into the updated Baseline, below. This information was set out in detail in the SA Scoping Report⁴ published in November 2017.

DCLG (2014) Minerals Planning Guidance [https://www.gov.uk/guidance/minerals

Minerals operators should look to agree a programme of work with the mineral planning authority which takes into account, as far as is practicable, the potential impacts on the local community and local environment (including wildlife), the proximity to occupied properties, and legitimate operational considerations over the expected duration of operations.

Water abstraction is additional to issues presented in NPPF.

Lots of useful operational detail on noise, dust plus flow chart wrt 1km search area and PM2.5 AQO – limit value for PM2.5 came into force 2015.

DCLG (2014) National Planning Policy for Waste⁵ []

Positive planning plays a pivotal role in delivering this country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;
- ensuring that waste management is considered alongside other spatial planning concerns, such as
 housing and transport, recognising the positive contribution that waste management can make to

⁴ Scoping Report: Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017

 $^{^5}$ https://www.gov.uk/government/uploads/system/uploads/attachment_ data/file/364759/ 141015_National_ Planning_Policy_f or_Waste.pdf

the development of sustainable communities;

- providing a framework in which communities and businesses are engaged with and take more
 responsibility for their own waste, including by enabling waste to be disposed of or, in the case of
 mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other
 infrastructure (such as safe and reliable transport links) complements sustainable waste
 management, including the provision of appropriate storage and segregation facilities to facilitate
 high quality collections of waste.

The protection of Green Belt from waste development has been enhanced in this document.

DEFRA (2013) The Waste Management Plan for England⁶

Sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. The key aim of the waste management plan for England is to work towards a zero waste economy as part of the transition to a sustainable economy. In particular, this means using the "waste hierarchy" (waste prevention, re-use, recycling, recovery and finally disposal as a last option) as a guide to sustainable waste management.

Kent Forum (2012) Vision for countywide strategy for the social, economic and environmental wellbeing of Kent's communities

Three Ambitions: Grow the economy Tackle disadvantage Put the citizen in control

Three cross-cutting themes:

- Protecting and enhancing the environment. Everything we do to develop and improve Kent's infrastructure must be sustainable. In growing the economy, we need to support low carbon technologies and help businesses operate more resource-efficiently. Tackling climate change is everyone's responsibility, and we will support and encourage people and communities to play their parts, including through volunteering. We must make the most of Kent's natural environment for people to enjoy, contributing to their wellbeing, and to attract business and tourism. The Kent Environment Strategy sets out the priorities in this area.
- Improving community safety, crime and antisocial behaviour. In order to build a strong economy, improve our lives and take control, the people and communities of Kent need to feel safe, protected from crime, anti-social behaviour, fires and accidents. There is more that we can do to reinforce a sense of community across the county.

 $^{^6}$ https://www.gov..uk/government/uploads/system/uploads/attachment_ data/file/265810/ pb14100-waste- management- plan-20131213.pdf

• Improving Health. Seeing improvements in residents' overall health, while, at the same time, tackling the health inequalities' gap is hugely important. Improvements will only be made with the support of employers, the voluntary and communities sector and residents themselves. Business can support positive physical and mental health measures for a healthy workforce. Residents need to accept greater responsibility for their health and by doing so improve life expectancy.

KCC (2015) Kent State of the Environment Report

Key issues:

- Air quality: It has been estimated that poor air quality contributes to approximately five percent of
 deaths per year and possibly contributes to more mortality and morbidity than passive smoking.
 There are currently 40 air quality management areas in the county where air pollutants have been
 known to exceed objectives set by Government.
- Transport: The county of Kent is currently facing increased congestion on both road and rail,
 impacting Kent's economy, health and environment. A shift to active travel, such as walking and
 cycling, and an increase in use of public transport can help alleviate congestion pressures, improve
 air quality and extend the capacity of our transport infrastructure over a longer timeframe.
- Water: In Kent we are already using most of the capacity in the county and in some places already
 exceeding it. This water stress will be exacerbated by a growing population and climate change. In
 addition, the quality of our water affects our health, our economy and our natural environment but
 is under increasing pressure from pollution, reduced river flow s and physical modifications to water
 bodies.
- Severe weather, heat and flooding: Severe weather events impact infrastructure, homes, communities and the delivery of services, to the detriment of Kent partners, residents and businesses. Kent has the highest risk of local flooding of all local authorities in England. Our health is also impacted by severe weather. For example, daily mortality in South East England increases at temperatures above about 27°C and heat-related mortality is projected to increase steeply in the UK in the 21st century.
- Land-use change: Our increasing population, housing development, transport link s, industry and
 agriculture all require space and resources, putting pressure on the county's landscapes and
 changing how we use the land. This also has an impact on the quality of our soils and their ability to
 sustain life, reduce carbon emissions and support resilience to climate change and its impacts such
 as flooding. The decisions we make in how growth is delivered for Kent will be vital to maintain the
 assets our residents value.
- Biodiversity: In Kent we have not met our Biodiversity 2010 targets and with biodiversity continuing
 to decline, it is likely that we will also fail to meet our Biodiversity 2020 targets without targeted
 interventions. A healthy natural environment, rich in biodiversity, provides more effective services;
 the economic impact that degraded habitats have on ecosystem services, for example through the
 decline in pollinators, is increasingly recognised.

• Energy consumption and generation: Kent is committed to reducing greenhouse gas emissions by 34% by 2020 and 60% by 2030 from a 2005 baseline. In the context of planned growth of our population and housing development across Kent, additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure we meet our targets and benefit from the opportunities for innovation in these sectors.

KCC (2016) Kent Environment Strategy

Development of the strategy provides a framework to ensure that resources are utilised to greatest impact. Our challenges, learning and opportunities together underpin the priorities we have identified in the themes of the strategy.

- Theme One: Building the Foundations for Delivery. Outcome: Our policies, actions and decisions are based on a clear evidence base and resources are in place for delivery.
- Theme Two: Making best use of existing resources and minimising negative impacts. Outcome: All sectors are aware of their impact on the environment and how to avoid or reduce this through evidence based decision making, reducing resource usage and wasting less.
- Theme Three: Toward a sustainable future. Outcome: Kent is actively addressing the risks, impacts and opportunities from environmental and climate change, whilst delivering wider economic and health opportunities.

KCC (2017) Environment Strategy: a strategy for Environment, Health and Economy Implementation Plan 2017

- Priority 5: Conserve and enhance the quality and supply of the county of Kent's natural and historical resources and assets
- Priority 6: Improve our resource efficiency such as energy, water and land
- Priority 7: Ensure sustainable access and connectivity for businesses and communities
- Priority 8: Influence future sustainable growth for the county of Kent
 - S F 8.1: Ensure that key environmental risks such as flooding, water scarcity and heat are informing policy decisions and development
 - SF8.2: Address the environmental challenges and ambitions identified in the Growth and Infrastructure Framework and local plans, such as sustainable and alternative transport options, green infrastructure, energy , water and flooding
- Priority 9: Improve the county of Kent's environmental, social and economic resilience to environmental change
 - SF9.2: Ensure that public sector services have assessed key environment and severe weather risks and opportunities and are taking action accordingly
- Priority 10: Supporting growth in the rural economy and low carbon and environmental services sector

o SF 10.2: Maximise opportunities for the rural sector.

Since the publication of the SA Scoping Report in November 2017, the National Planning Policy Framework (NPPF) has been revised and was published in July 2018⁷. This is the overarching document guiding planning policy in England and as such is important to review to ensure that the SA appraisal framework is consistent with the policy objectives of the NPPF. In 2018, the Government also published a new 25 Year Environment Plan, "A Green Future"⁸. A review has been undertaken and the main policy objectives of the NPPF and "A Green Future" relevant to the Early Partial Review are set out in Appendix A.

The key conclusions drawn from this review are that the appraisal framework used to assess the Early Partial Review should be amended to ensure that the following policy objectives are adequately covered in the framework:

- Recognise the economic and other benefits of the best and most versatile agricultural land;
- Prevent inappropriate development in the Green Belt;
- Protect and enhance public rights of way and access;
- Protect local green space.

3.3. What's the situation now and how would it change without the plan (sustainability 'baseline')?

The following is a summary of the sustainability baseline characteristics described by URS (2013), to set the scene on this further piece of work. Additional items identified during context review are also presented.

Environmental baseline

- Kent is considered to be one the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe.
- Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway UA), the Isle of Thanet, the Stour Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 8.5% of the county. The county contains c.10% of England's ancient woodland.
- The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to builtdevelopment or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- Analysis at the County level has informed the location of 16 Biodiversity Opportunity Areas (BOAs) across Kent covering 40% of the land area (BOAs cover 35% of the South East).
- Since 2008 there has been a reduction in carbon dioxide emissions of 0.8 tonnes per capita. Nonetheless, this figure remains higher than regional and national emission levels.

National Planning Policy Framework, Ministry of Housing Communities and Local Government, July 2018

⁸ A Green Future: A 25 Year Plan to Improve the Environment, HM Government, 2018

- In 2010 it is estimated that 1050 early deaths occurred as a result of just PM2.5 air pollution across Kent & Medway [KMAQM, 2015]
- Kent is considered to be the most at risk lead local flood authority in England. Flooding has a significant impact on residents and the economy, with such effects predicted to worsen due to climate change.
- In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption. [EA, 2012]

Social baseline

- Kent had an estimated population of 1,466,500 in mid-2011. By 2021 the population of Kent is projected to increase by 9.4% from 2012. The age group with the greatest projected percentage change in population is 65+(21.2%).
- In mid-2011, Kent had the largest rural population of any county in the South East (29%) and identified problems of 'rural deprivation', e.g. associated with access to services, facilities and housing affordability.
- In terms of the 'Index of Multiple Deprivation', Kent ranks within England's least deprived third of authorities. However, significant areas within Kent are amongst England's most deprived 20%. Life expectancy is 8.2 years lower for men and 4.5 years lower for women in the most deprived areas of Kent than in the least deprived areas.
- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. About 18.4% of Year 6 children are classified as being obese, lower than the average for England. However, estimated levels of adult obesity are worse than the England average.
- Climate change projections highlight an increase in risk to people from flooding; and hotter and sunnier summers leading to public health risks.

Economic baseline

- In 2011, the Gross Domestic Household Income (GDHI) in Kent was £16,855, 5.1% above the UK average, while the South East region was 12.8% above the UK average.
- 2011 was the first year since 2008 that the 'birth' of enterprises in the Kent exceeded the number of 'deaths'.
- During the period October 2011 to September 2012, the employment rate for residents of Kent was 71.1%, a lower figure than that for the South East (74.6%) and close to that for England (70.7%).
- In Kent, the unemployment rate for October 2011 to September 2012 was 7.4% of the population aged 16 years and over; greater than the rate for the South East (5.8%) and close to the rate for England (7.9%).
- The 'public administration, education and health' sector employs the highest proportion of persons aged 16 to 64 (30.7%). Agriculture and fishing employs the lowest proportion of the population aged 16 to 64 (1.6%). These are also the lowest / highest employers at regional and national levels.

How would the baseline would change without the Early Partial Review?

There is a degree of uncertainty about how the baseline might change without the adoption of the Early Partial Review. Developments will still be required to comply with the development management policies of the KMWLP. This includes policies on the protection and enhancement of: biodiversity value, landscape, Green Belt, heritage assets, the water environment, health and amenity (including air quality) and transportation. Long term trends in environmental quality are likely to continue.

However, without the Early Partial Review there is the potential for oversupply in waste capacity as policies in the KMWLP identify a capacity need. This may result in waste being transported from outside the county to provide inputs to waste facilities which will have which will have adverse effects on transport networks, air quality and greenhouse gas emissions.

Without the Early Partial Review it is possible that some mineral resources will be lost to other developments through weaker safeguarding policy. Kent may be less able to provide enough minerals to support the expected future demand for minerals from construction and industry. In such an event, there would be a need to source minerals from elsewhere. This may mean importing minerals from other parts of the country, which will have adverse effects on transport networks, air quality and cost. Alternatively, increased quantities may need to be secured from secondary and recycled aggregates and/or marine dredged aggregates. If sufficient minerals of the right type cannot be found, construction and industrial growth may be checked. This could lead to insufficient homes being provided with adverse effects on people and communities. Minerals in Kent would not provide sufficient material to support economic growth and industrial activity, in which case employment levels could reduce and GDP and household incomes may fall.

Loss of transport and other infrastructure for minerals and waste without the Early Partial Review is likely to result in materials being transported further with consequent impacts on air quality and transport networks and could result in the loss of sustainable transport modes. This would increase transport and material costs which would adversely affect the profitability of industry.

Without the adoption of the Early Partial Review, emissions of carbon dioxide will be greater than with its adoption. The aim is to reduce the targets for the percentage of waste going to landfill and to manage it at higher levels of the waste hierarchy and to promote the recovery of energy from waste. Without this, it could increase climate change effects including flooding with risks for communities, wildlife and habitats. Other climate change pressures may be increased with effects on biodiversity and communities, including increased temperatures and more frequent extreme weather events.

Landscape in the locality of the strategic site for waste could be negatively affected if the Early Partial Review is not adopted. If insufficient flue ash is available to restore the landfill, the landfill may not be restored in line with original plans which could have lasting landscape impacts and may affect the amenity of nearby residents.

The social baseline is unlikely to be affected without the adoption of the Early Partial Review. Population, levels of deprivation and health are unlikely to be significantly different with or without the Early Partial Review.

3.4. What are the key sustainability issues?

Following review of both context and baseline, the SA Scoping Report set out the key sustainability issues in Kent as follows. Findings of significance from the SA of Kent's MWLP are also presented (see boxes) (both URS, 2013):

Biodiversity

- Ambitious BAP targets have been set, including for habitat creation and for reducing fragmentation
 and improving connectivity. Landscape scale projects are underway with biodiversity conservation and
 access to biodiversity as central components.
- It is possible to increase the connectivity between important habitat patches by incorporating habitat creation as part of new development. There is a particular need to maximise the biodiversity benefits associated with restoration of minerals sites.
- Biodiversity benefits relate to the minerals development management strategy, which is set to ensure that negative effects associated with minerals extraction are avoided or mitigated, and the potential for minerals development to contribute to biodiversity objectives is realised.

Climate change

- There is the potential to promote energy from waste as well as other technologies that increase the carbon efficiency of minerals and waste operations.
- Transport is a significant contributor to greenhouse gas emissions that should be addressed through the plan.

Community and well-being

- Clear spatial variation across Kent exists in terms of income, employment and health deprivation.
- Rural deprivation is also a recognised problem, for example for the Isle of Sheppey and the Romney Marsh area.
- Deprivation is focused amongst particular socio-economic groups, for example Gypsies and travellers.
- Community impacts associated with the proximity of quarries and also lorry movements is an issue of strategic importance.
- Traffic on the motorway and A-road network is the cause of the majority of designated Air Quality Management Areas (AQMAs)
- Future development at existing population centres is likely to put further pressure on the road network, and lead to new and worsened occurrences of poor air quality.
- There remain instances where point source air pollution is a strategic issue.

Sustainable economic growth

- There are ambitious plans for economic growth and regeneration, for example in East Kent and the Kent Thames Gateway.
- There are local disparities in economic activity (including problems of 'rurality')
- Economic benefits relate to the targeted measures that are proposed as part of the minerals strategy; in particular, around ensuring supply of materials for strategically important industries / economic activities.

Flood risk

• There is extensive flood risk in Kent, and this situation is set to become worse with climate change.

Land

- There is a need to make best use of previously developed land and avoid the loss of the County's best and most versatile agricultural land. There is also a need to avoid conflict with coastal geomorphology
- 'Land' and 'landscape' benefits relate to the support that is provided for Construction and Demolition (CD) recycling (i.e. aggregate recycling), which reduces the need to extract primary aggregates. There is also a focus on ensuring that the non-recyclable fraction of this inert waste is targeted at quarry restoration projects as a priority. In addition, the MWLP is supportive of efforts to increase the movement of minerals via wharves which should have the effect of encouraging supply of marine dredged aggregates and hence reducing the need for land won aggregates.

Landscape and the historic environment

- There is a need to protect the integrity of the most valued and sensitive landscapes as well as to avoid damage to the landscape character more widely (signs of change inconsistent with countryside character have been identified in several areas).
- Along with a loss of the distinctiveness of the landscape character there has been a noticeable decrease in the tranquillity of landscapes and landscapes that are genuinely 'wild and remote'.
- Specific landscape impacts can be associated with minerals and waste development. Appropriate restoration should be sought to mitigate effects.
- There is a need to take account of designated heritage assets and their settings as well as undesignated assets and wider historic character
- Heritage / historic environment benefits (which are relatively small magnitude and hence of unclear significance) relate to the support that is provided to extraction of minerals for heritage building products with a view to maintaining a diverse supply.
- There remains ongoing debate about the potential for impacts to the AONB, e.g. from silica sand extraction, but the stringency of policy has been strengthened and so effects are now unlikely. There is also some uncertainty around the landscape / biodiversity implications of making provision for both soft sand and sharp sand / gravel landbanks.

Transport

- Much of the primary road network operates at, or above, capacity and there is a shortage of freight paths on the rail network.
- There is a need to adhere to the proximity principle wherever possible.
- There is a need to increase the amount of waste and, in particular, minerals transported by rail or inland waterway.
- Plans are in place to improve the transport infrastructure within and to the Thames Gateway, East Kent and Ashford. The Kent MWDF should recognise and support the aims of regional hubs.
- 'Transport' (and hence also climate change mitigation) benefits relate to the fact that the waste strategy is geared towards ensuring strict adherence to the 'proximity principle', i.e. a situation whereby waste is managed close to the source of production. It is also the case that the minerals strategy includes a focus on the safeguarding of wharves and railheads across the County to enable the on-going importation of marine dredged aggregates, crushed rock and other minerals by sea and rail, rather than by road. No significant negative effects / trade-offs are identified and no recommendations remain outstanding at this current stage.

Water

- Water scarcity is set to become a greater problem in coming as a result of population growth, climate change and the need to comply with the requirements of the Water Framework Directive.
- Groundwater pollution from a range of sources is evident across much of Kent.

3.5. Characteristics of areas likely to be significantly affected

The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by the Early Partial Review. In deciding which areas are likely to be significantly affected, the SA has considered whether there is a spatial element to the proposed policy changes and therefore whether some parts of the county will be particularly affected. There is only one policy with a spatial element and that is the policy relating to Norwood Quarry, the strategic site for waste. The appraisal of the change to this policy has not identified any significant effects arising from change to the policy. It is therefore concluded that there are no areas likely to be significantly affected.

3.6. Areas of Particular Environmental Importance

A Habitats Regulations Assessment has been undertaken for the Early Partial Review⁹. This identified that impacts from one strategic site, Norwood Quarry Extension, requires consideration because of the potential for impact on two designated sites:

- Medway Estuary and Marshes SPA and Ramsar;
- Swale SPA and Ramsar

Medway Estuary and Marshes SPA and Ramsar

The Medway Estuary feeds into and lies on the south side of the outer Thames Estuary in Kent, south-east England. It forms a single tidal system with the Swale and joins the Thames Estuary between the Isle of Grain and Sheerness. It has a complex arrangement of tidal channels, which drain around large islands of saltmarsh and peninsulas of grazing marsh. The mud-flats are rich in invertebrates and also support beds of *Enteromorpha* and some Eelgrass *Zostera* spp. Small shell beaches occur, particularly in the outer part of the estuary. Grazing marshes are present inside the sea walls around the estuary. The complex and diverse mixes of coastal habitats support important numbers of waterbirds throughout the year. In summer, the estuary supports breeding waders and terns, whilst in winter it holds important numbers of geese, ducks, grebes and waders. The site is also of importance during spring and autumn migration periods, especially for waders.

⁹ Early Partial Review of the Kent Minerals and Waste Local Plan 2013-30 & Kent Mineral Sites Plan: Appropriate Assessment, Ecus Ltd, November 2018

Swale SPA and Ramsar.

The Swale is located on the south side of the outer part of the Thames Estuary in south-eastern England. The Swale is an estuarine area that separates the Isle of Sheppey from the Kent mainland. To the west it adjoins the Medway Estuary. It is a complex of brackish and freshwater, floodplain grazing marsh with ditches, and intertidal saltmarshes and mud-flats. The intertidal flats are extensive, especially in the east of the site, and support a dense invertebrate fauna. These invertebrates, together with beds of algae and Eelgrass *Zostera* spp., are important food sources for waterbirds. Locally there are large Mussel *Mytilus edulis* beds formed on harder areas of substrate. The SPA contains the largest extent of grazing marsh in Kent (although much reduced from its former extent). There is much diversity both in the salinity of the dykes (which range from fresh to strongly brackish) and in the topography of the fields. The wide diversity of coastal habitats found on the Swale combine to support important numbers of waterbirds throughout the year. In summer, the site is of importance for Marsh Harrier *Circus aeruginosus*, breeding waders and Mediterranean Gull *Larus melanocephalus*. In spring and autumn migration periods, as well as during winter, the Swale supports very large numbers of geese, ducks and waders. Ashdown Forest SAC and SPA

Habitats Regulations Assessment

Kent County Council have commissioned Ecus Ltd to undertake a Habitats Regulations Assessment (HRA) of the Early Partial Review. The HRA investigates the potential impact of the policy changes proposed by the Early Partial Review on Natura 2000 sites in the context of the Conservation of Habitats and Species Regulations 2010 (as amended) ('the Habitats Regulations'), which transpose the European Habitats Directive 1992 and Wild Birds Directive 2009 ('the Directives') into English law and hereafter referred to as the 'Habitats Regulations'.

An HRA Screening report concluded that:

'Potential air quality impacts as a result of Norwood Quarry, which is located within 200m of [Medway Estaury and Marshes SPA and Ramsar; and The Swale SPA and Ramsar] sensitive European sites. It will need to be determined whether this site is likely to result in an increase of more than 200 Heavy Duty Vehicles /day on any road that lies within 200m of a European site.'

'If any further information regarding the issues and the site can be obtained, this assessment can be refined to inform the final selection of sites for submission to the Secretary of State. If such information is not currently available then the recommendations for further study identified in the preceding sections should be used as specific guidance to the site promoters involved in each site.'

The Appropriate Assessment found that the proposed changes as a result of the Early Partial Review of the KMWLP are relatively minor. As this this does not result in any significant changes to the strategic site or to the KMWLP and no new information is available on the site and likely vehicle movements to inform further assessment, the conclusions of the original HRA screening report (as above) remain valid.

4. How has the plan developed up to this point?

4.1. Background to the Development of the SA

The process of making the KMWLP commenced in 2009, with SA starting simultaneously and leading to the publication of the MWLP SA Scoping Report (Scott Wilson, 2010). The MWLP SA Scoping Report (Scott Wilson, 2010) included Sustainability Objectives (SO) which had been established during the Scoping process to provide the Framework for the subsequent Sustainability Appraisal. These are presented in Table 6.

Sustainability Objective (SO)	
SO1	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment
SO2	Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent Biodiversity Action Plan and other strategies
SO3	Protect and enhance Kent's countryside and historic environment
SO4	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management
SO5	Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources
SO6	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible
SO7	Plan for the correct waste management facilities, in the right place at the right time
SO8	Make efficient use of land and avoid sensitive locations
SO9	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being
SO10	Support the delivery of housing targets
SO11	Support economic growth and diversification

Table 5 Sustainability Objectives established during SA Scoping (Scott Wilson, 2010)

In 2011, these SOs were used to appraise the options which were at the time presented for Minerals and Waste Sites. This was undertaken on a site-by-site basis (Atkins, 2011). In 2012 a similar process was used to assess the Preferred Options (URS, 2012). By 2014 these SOs had been further developed, and the Consultation Draft of the SA Report (URS, 2013) presented the following Assessment Framework (Tables 7 & 8):

1	Biodiversity
2	Climate change
3	Community and well-being
4	Sustainable economic growth
5	Flood risk
6	Land
7	Landscape and the historic environment
8	Transport
9	Water

Table 6 Sustainability Assessment Framework used in SA Report (Consultation Draft) (URS, 2013)

The KMWLP was adopted in 2016 having been through full Sustainability Appraisal culminating in the SA Report and Addenda (URS, 2013; URS, 2015; AECOM, 2015a and 2015b) and the SA Adoption Statement (AECOM, 2016). Kent County Council (KCC) are now proceeding with the Early Partial Review preparation process.

In Summer 2017 a Scoping exercise was undertaken by Amey, leading to the publication in November 2017 of a Scoping Report¹⁰ which developed the context and baseline for this Early Partial Review SA, and developed the SA Framework and Objectives to be used in the appraisal (presented in Section 4.1).

4.2. The Development of the Early Partial Review

Alongside publication of the SA Scoping Report, Kent County Council published proposals for the scope and content of the Early Partial Review as part of a Regulation 18 consultation process. The rationale for the Early Partial Review was as follows.

The adopted KMWLP identified a shortfall in waste management capacity over the Plan period for the following types of waste management: waste recovery (energy from waste and organic waste treatment), hazardous waste, and the disposal of dredgings. To improve certainty concerning the provision of the required capacity, policies CSW 7, CSW 8, CSW 12 and CSW 14 commit the County Council to allocating sites suitable for accommodating waste facilities in a Waste Sites Plan. Policy CSW 4 sets the strategy context for waste management capacity.

A 'Call for Sites' exercise from December 2016 to January 2017 resulted in several sites being promoted but none for the disposal of dredgings or asbestos.

In terms of additional organic waste treatment capacity, the review of waste requirements concluded that, when considered separately from recycling there is a continued need for some additional capacity but when recycling and composting are considered together no additional capacity is required. In any event, it is considered that the Plan's policy is sufficiently supportive of organic waste treatment, such that the identification of specific sites to provide any additional certainty that development will come forward is not justified.

The review of waste requirements therefore indicates that there is insufficient justification for a Waste Sites Plan and therefore changes to a number of the adopted KMWLP waste policies and explanatory text are required to remove the commitment to identify sites within a separate Waste Sites Plan. This will ensure that there is no over-supply of capacity.

¹⁰ Scoping Report: Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017

The original calculation of recycling and composting capacity requirements presented in Policy CSW 7 was based on targets formulated In January 2012 using 2010/11 data. The Local Authority Collected Waste (LACW) targets were based on the aspiration of KCC in its role as Waste Disposal Authority (WDA) for Kent and the Commercial and Industrial Waste targets were based on those in the South East Plan (adopted in 2009).

Since adoption of the KMWLP, the EU Circular Economy Package has been adopted and the UK Government has confirmed its intention to comply with the targets set within it regardless of the UK leaving the European Union. Therefore the targets have been updated to reflect those set as follows:

- recycling target for municipal waste 55% by 2025 and 60% by 2030; and
- 10% limit of landfilling of municipal waste by 2035.

In addition, the progression to achieving LACW recycling targets has been scaled back (compared both to adopted Plan and the draft Early Partial Review document) to reflect the fact that the actual recycling rate achieved in 2015/16 was five percentage points lower than projected in the adopted KMWLP (46% rather than 51%), therefore the revised targets are more achievable (while remaining ambitious).

Kent County Council has been using the adopted minerals and waste safeguarding policies while considering local applications that affect both safequarded minerals and waste management infrastructure. These policies include policies DM 7 and DM 8. Monitoring of the Plan has revealed a significant ambiguity that means that these policies are not being interpreted as intended and that in some circumstances, minerals and waste safeguarding objectives are being undermined. In practice, there have been occasions where the policies are being interpreted to exclude any site allocations in adopted development plans from the safeguarding process, regardless of whether minerals and waste safeguarding was considered during the site allocation process. The Early Partial Review which is proposed provides the opportunity to address this matter.

In November 2017, proposals for the scope and content of the Early Partial Review were published for a Regulation 18 Consultation reflecting changes outlined above for policies CSW 4, CSW 7, CSW 8, CSW 12, CSW 14, DM 7 and DM 8.

Policy CSW 5 sets out the criteria to be applied to the assessment of any forthcoming application relating to the Strategic Site Allocation at Norwood Quarry. Subsequent to the Regulation 18 consultation, a decision was taken to include an amendment to this policy in the Early Partial Review. The Early Partial Review proposes to add a clause providing for assurances that the proposed site can be suitably restored in the event that the void space may no longer be used for management of flue dust residues due to a possible change in government policy. Currently national policy allows landfilling of such waste under a special derogation from the Landfill Directive waste acceptance criteria requirements. This has been subject to review in the past and may change in future. In addition, it is proposed to delete the requirement for an assessment of alternative management methods for flue ash given that significant

tonnages are already being managed through other treatment routes. This additional policy change has been added to the scope of the Early Partial Review and is issued for consultation as part of the Regulation 19 consultation process.

An outline of the process to date is presented in Figure 1, below. At the time of reporting Step 10 is nearing completion.



Figure 1 Summary of the parallel planning and SA processes

4.3. Difficulties Encountered

A number of difficulties were encountered in undertaking the appraisal:

Data. A common problem affecting SA is the availability and reliability of data. Although data has
been collected to illustrate a number of the conditions and trends relevant to the SA of the Early
Partial Review, some data sets are more useful than others, and some data sets are known to be old,

incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with certainty.

Uncertainty. It has not been possible for the SA to quantify the predicted impacts of the policy changes proposed by the Early Partial Review. In all cases a qualitative assessment of impacts has been made. This is particularly the case in relation to the effects on greenhouse gas emissions of encouraging the management of waste at higher levels of the waste hierarchy. While positive impacts are likely, it has not been possible to quantify these. It is also not possible to know with certainty what the implications are likely to be for the effects of climate change, including on communities and wildlife.

5. How has the appraisal at this current stage been undertaken? [Sustainability Appraisal Methodology]

5.1. SA Framework and Sustainability Objectives

Following due diligence in terms of the context and baseline conditions, the Framework and Sustainability Objectives for the SA of the Early Partial Review has been developed using that produced by URS (2013). The relationship between the 2010 Scoping and 2013 SA Report objectives is presented in Table 7 below, which also expands on the detail of the objectives and the additions made following the 2017 Scoping exercise and review of the NPPF 2018 and 25 Year Environment Plan.

Sust	ainability Objectives	Corresponding SO	Detail – including additions resulting from MPS SA Scoping (Amey,
(UR	S, 2013)	(Scott Wilson, 2010)	2017) and additions resulting from review of NPPF and 25YEP
1	Biodiversity	SO2	Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the
	1	1	achievement of the Kent BAP and other strategies
	I I	I I	– Add to the biodiversity baseline by creating opportunities for
	I I	1	targeted habitat creation (which, ideally, contributes to local or
	1		landscape scale habitat networks).
	1		- Avoid hindering plans for biodiversity conservation or
	I I	1	enhancement
		1	- Support increased access to biodiversity
2	Climate change	SO5	Address the causes of climate change through reducing emissions
			of greenhouse gases through energy efficiency and energy
	i	i	generated from renewable sources
	1	i I	– Promote sustainable design and construction of facilities and
	I I	I I	support wider efforts to reduce the carbon footprint of minerals
	1	1	operations.
3	Community and	S09, S07	Support efforts to create and sustain sustainable communities,
	well-being		particularly the improvement of health and well-being; and support
			the delivery of housing targets
		i	- Help to redress spatial inequalities highlighted by the Index of
	1		Multiple deprivation.
	1	1	– Help to tackle more hidden forms of deprivation and exclusion,
	I I	I I	such as that which is experienced in rural areas and particular
	I I	1	socio-economic groURS within communities.
	1		_ Ensure that the necessary aggregates are available for building,
	1	1	and that the necessary waste infrastructure is in place to support
		1	housing growth
			– Ensure that minerals development does not contribute to poor air
			quality particular reference to PM2.5.
	1	1	- Protect and enhance public rights of way and access

	· · · · · · · · · · · · · · · · · · ·		– Protect local green space
<u>-</u>	Sustainable	SO11	Support economic growth and diversification
	economic growth	i	– Support the development of a dynamic, diverse and knowledge-
	I I	I I	based economy that excels in innovation with higher value, lower
	I I	I I	impact activities
	I I	1	– Stimulate economic revival and targeted employment generation
	1	1	in deprived areas
5	Flood risk	SO1	Reduce the risk of flooding and the resulting detriment to public
		i I	wellbeing, the economy and the environment
	I I	I I	– Ensure that development does not lead to increased flood risk on
	I I	I I	or off site
	1	1	– Seek to mitigate or reduce flood risk through developments that
			are able to slow water flow and promote groundwater recharge
6	Land	SO8	Make efficient use of land and avoid sensitive locations
	I	i I	– Make best use of previously developed land
	I I	I I	– Avoid locations with sensitive geomorphology
	I I	I I	- Recognise the economic and other benefits of the best and most
	1	1	versatile agricultural land
	1	1	- Prevent inappropriate development in the Green Belt
7	Landscape and	SO3	Protect and enhance Kent's countryside and historic environment
	the historic	i I	– Protect the integrity of the AONBs and other particularly valued or
	environment	I I	sensitive
	I I	1	landscapes
	1	1	- Take account of the constraints, opportunities and priorities
	1		demonstrated through landscape characterisation assessments and
		i	other studies at the landscape scale.
	I I	I I	– Protect important heritage assets and their settings, as well as
	I I	I I	take account of the value of the character of the wider historic
	. <u></u>	L	environment
8	Transport	SO6	Reduce and minimise unsustainable transport patterns and facilitate
		1	the transport of minerals and waste by the most sustainable modes
	I	I	possible
	I I	I I	Minimise minerals and waste transport movements and journey
	I I	I I	lengths; and encourage transport by rail and water.
	1		Ensure that minerals and waste transport does not impact on
	1	1	sensitive locations, including locations already experiencing
	1	1	congestion and locations where planned growth or regeneration is
			reliant on good transport networks.
9	Water	SO4	Maintain and improve the water quality of the Kent's rivers, ground
	I I	I I	waters and coasts, and achieve sustainable water resources
		L	i management

· · · · · · · · · · · · · · · · · · ·		– Ensure that minerals and waste development seeks to promote
	I I	the conservation of water resources wherever possible particular
	i i	reference to abstraction.
	1	- Avoid pollution of ground or surface waters, particularly in areas
I I I	I I	identified as being at risk or sensitive
Scoped out of URS	SO10 [waste]	!
(2013)	. L	

Table 7 SA Framework

5.2. Applying the Framework

5.2.1 Effects Categories and Assumptions

The SA of sites was undertaken by URS in 2012 for the sites that at the time were deemed to be Preferred Options. Although the outcome of this exercise is no longer relevant due to subsequent changes to the MWLP, the Effects Categories (Figure 2) have been used in the current exercise.

	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	
Significant adverse effect	-
Uncertain effect	?

Figure 2 Effects categories (URS, 2012)

5.2.2 SA of the Early Partial Review

The SA is required to undertake an appraisal of the Early Partial Review as proposed. Each of the changes to policies in the KMWLP has been subject to assessment using the SA framework developed by URS in their 2013 SA Report as amended (see table 8). An assessment matrix has been drafted and is presented in Appendix B and the results are summarised in Section 6.1.

As discussed in Section 3.3; it has been assumed that the baseline conditions within Kent remain unchanged from those detailed within the URS Sustainability Appraisal and Addenda published to date.

The appraisal of policy changes has considered a range of different types of effects as required by Annex I of the SEA Directive, namely: secondary effects; effects in the short, medium and long term; whether effects are permanent or temporary; and positive and negative effects. The type of effects identified are indicated in the tables in Appendix B.

Effects are identified in the short, medium and long term. To make this assessment, the short term has been chosen as being within the first 5 years of adoption of the Early Partial Review, the medium term is considered to be the remainder of the Plan period for the KMWLP and the long term is after the end of the Plan period of the KMWLP.

An assessment has also been made of the probability of the identified effect occurring (low, medium or high), whether the effect is direct or indirect, and whether the effect is temporary or permanent indicated by whether or not the effect could be reversed.

Cumulative and synergistic effects are discussed in Section 6.3.

In order to determine the significance of effects, the appraisal has followed the criteria for determining significance as set out in Annex II of the SEA Directive.

The appraisal has assessed the likely effects arising from adoption of the Early Partial Review and considered whether there is scope to make recommendations for measures to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Early Partial Review. In effect, the appraisal has not identified any significant adverse effects and therefore there is no scope to make recommendations for mitigation.

5.2.3 SA of Alternatives to the Early Partial Review as Proposed

The SA is required to appraise reasonable alternatives to the Early Partial Review as proposed. The reasonable alternatives that have been identified largely derive from a 'do nothing' option, in other words, not to make the changes proposed by the Early Partial Review. The following have been identified as reasonable alternatives, here referred to as 'options'.

Option A

• To allocate land for waste facilities as envisaged in the adopted KMWLP;

Option B

- Option B1: To retain the targets for recycling, recovery and landfill in policy CSW 4 of the adopted KMWLP;
- Option B2: To retain targets for recycling and reduce targets for landfill in policy CSW 4 of the adopted KMWLP;

Option C

Not to strengthen safeguarding in policies DM 7 and DM 8

Option A would be to produce a Waste Sites Plan as originally envisaged in the KMWLP. It would be possible for Kent County Council to identify and allocate sites as suitable for waste-related development even though no capacity gap has been identified and therefore this has been appraised as a reasonable alternative.

Options B1 and B2 are alternative waste hierarchy targets to those proposed by the Early Partial Review. The Early Partial Review proposes a reduced target for landfill and recycling and an increased target for other recovery. It would be reasonable to retain the targets set by the adopted KMWLP, as these were considered reasonable when it was adopted in 2016. However, a reduced recycling target in the Early Partial Review could be considered a reduction in ambition for sustainable waste management, while retaining a higher landfill target in the adopted KMWLP could similarly be seen as insufficient ambition for sustainable waste management. A third option would therefore be to avoid both of these situations, retaining the recycling ambition of the KMWLP and reducing the landfill target to promote more sustainable waste management.

Option C constitutes the 'do nothing' option in regard to safeguarding.

The 'do nothing' option in respect of the restoration of the landfill at Norwood Quarry is not considered a reasonable alternative to that proposed in the Partial Review. To leave the landfill unrestored would not be an acceptable approach to waste management activity.

Each of the identified alternatives above have been appraised against the SA framework and an assessment made of the likely impacts on sustainability objectives. The detailed results are set out in Appendix C and summarised in Section 6.2.

6. Sustainability Appraisal Findings and Recommendations

6.1. SA of the Early Partial Review as Proposed

The SA has appraised each of the policy changes which are proposed in the Early Partial Review. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

The detailed findings of the SA of policy changes are set out in Appendix B and summarised below.

		Sustainability Objective									
Policy	1 Biodiversity	2 Climate change	3 Community and wellbeing	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the historic environment	8 Transport	9 Water		
CSWS 4	+	0	+	+	0	0	0	?	0		
CSW 5	+	0	?	0	0	0	+	0	0		
CSW 6	0	0	0	0	0	0	0	0	0		
CSW 7	+	0	+	+	0	0	0	?	0		
CSW 8	+	+	+	+	+	0	0	0	0		
CSW 12	0	0	0	0	0	0	0	0	0		
CSW 14	0	0	0	0	0	0	0	0	0		
DM 7	0	0	++	++/-	0	0	0	0	0		
DM 8	0	0	+	++/-	0	0	0	+	0		
Overall impacts	+	+	++	++/-	+	0	+	+	0		

Table 8: Summary of Findings of SA of Partial Review Overall

Discussion

The Early Partial Review will promote increased reuse, recycling and recovery, which will have climate change benefits by reducing the emission of greenhouse gases from waste management and support the move towards a circular economy.

Ensuring restoration of the landfill in the event that insufficient flue ash is available to complete the landform will help to improve the landscape impacts of the site and remove any amenity impacts on communities from an unrestored site. Restoration plans include biodiversity benefits and these would be secured earlier than with original plans.

Promotion of energy recovery and heat will reduce emissions of greenhouse gases, helping to attenuate the

effects of climate change, particularly the pressures resulting on biodiversity and communities including from flood risk. Energy recovery will also recover economic benefits from waste and provide heat for homes and communities.

Improved safeguarding of mineral resources will help to ensure the availability of aggregates to support housing construction to sustain communities and support economic/industrial activity, although encouraging use of a non-renewable resource is not sustainable. Improved safeguarding of infrastructure for minerals and waste management and transport will also help to support construction and economic/industrial activity and help to ensure the economic transport of materials and availability of sustainable modes of transport.

6.1.1 Recommendations for Mitigating Adverse Effects

The SA has considered whether there is scope for making recommendations for measures to prevent, reduced and as fully as possible offset any significant adverse effects of the Early Partial Review. In practice, no significant adverse effects have been identified and therefore no mitigation recommendations are made.

6.2. SA of the Alternatives to the Early Partial Review as Proposed

Each of the identified alternatives above have been appraised against the SA framework and an assessment made of the likely impacts on sustainability objectives. The detailed results are set out in Appendix C and summarised below.

Option A

The sustainability implications of Option A are very unclear. For a number of sustainability objectives, there may be impacts associated with the allocation of waste sites as originally envisaged in the KMWLP but these are strongly dependent on the nature, scale and location of facilities which would be developed which are currently unknown. These are the effects on biodiversity, community wellbeing, flood risk, land use, landscape, historic assets and water quality and availability. However, developments will be required to comply with development management policies in the KMWLP therefore adverse effects are unlikely to be significant.

The likely effects from Option A on other sustainability objectives are also unclear because it is not known what the practical effect of allocating sites would be. Allocation of waste sites which are not required for Kent's waste may increase the distance waste is transported. Waste management facilities may be built that then source waste streams from outside the county, increasing the distances that waste is transported which could have adverse impacts on air quality, greenhouse gas emissions and transport networks, but would bring economic resources into the county. Alternatively, if there are insufficient local sources of waste, the facilities may simply not be built and no effects will occur.

Option B1

The impacts of Option B1 on several sustainability objectives are unclear. There may be positive or negative impacts on biodiversity, flood risk and water quality and availability through management of some waste at different levels of the waste hierarchy, but the impacts from waste management are more strongly dependent on how waste is managed at individual sites and where those sites are, which is not addressed by policy CSW 4.

The effect on other sustainability objectives is also unclear because the balance of beneficial and adverse effects is not known. A higher recycling target than in the Early Partial Review will support more sustainable waste management which will contribute to the county's economy and encourage reduced greenhouse gas emissions through greater resource efficiency, whereas a higher landfill target would reduce the capacity for energy recovery from waste thereby reducing the level of resources that can be recovered from waste and increasing greenhouse gas emissions. Higher recycling targets are likely to encourage additional vehicle movements to transport recyclables but the scale of effects is not likely to be significant for the county overall.

Option B2

Option B2 would have a range of positive impacts on sustainability objectives. A higher recycling target than in the Early Partial Review will support more sustainable waste management and innovation and encourage reduced greenhouse gas emissions through greater resource efficiency. A lower landfill target will facilitate the recovery of resources from waste that would otherwise be landfilled.

Higher recycling targets are likely to encourage additional vehicle movements to transport recyclables but the scale of effects is not likely to be significant for the county overall. Reduced greenhouse gas emissions will help to reduce the pressures on biodiversity arising from climate change and reduce the exposure of communities to flood risk compared to a lower recycling target, although the effects are more strongly dependent on how waste is managed at individual sites and where those sites are located, which is not addressed by policy CSW 4.

Option C

Retaining the safeguarding approach in policy DM 7 is likely to reduce the availability of primary aggregates available to support economic activity and housing growth with adverse effects on communities, although the use of non-renewable resources is not sustainable.

Loss of transportation infrastructure through weak safeguarding in policy DM 8 is likely to result in minerals and waste being transported in a less economically efficient manner than otherwise, and may result in the loss of sustainable modes of transport for materials, both of which would result in increased greenhouse gas emissions from waste and minerals transport, increased pressure on transport networks and potentially

adverse impacts on air quality and flood risk, although the significance of air quality and flood risk impacts is uncertain and to some extent location-dependent.

6.3. Cumulative Effects and Inter-Relationship Between Effects

Cumulative Effects

The SEA Directive requires assessment of an additional level of impacts in addition to straightforward direct impacts. These are specified as "secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative". The following approach has been taken to identifying such impacts.

A number of different types of impact are set out in European Commission guidance:

- separate developments causing the same impact cumulative;
- different impacts acting together on a receptor e.g. air pollution and land take cumulative;
- plan impacts which give rise to other indirect impacts secondary; and
- different impacts which together give rise to yet another impact cumulative and secondary.

There is therefore a need to consider both secondary and cumulative impacts in the appraisal. Secondary impacts were considered as an integral part of the main appraisal work, and this is indicated in the appraisal matrices in Annexes B and C where impacts are either direct or indirect i.e. secondary. Certain other attributes are common to all types of impact: these are timescales (i.e. short, medium and long-term impacts), reversibility (i.e. permanent or temporary impacts) and whether the impacts are positive or negative. These attributes were also all considered as integral aspects of impact assessment, and this is similarly indicated in the appraisal matrices in Annexes B and C. Cumulative impacts are discussed in this section of the SA Report.

There are two types of situation that could give rise to cumulative impacts:

- the same effect arising from two or more different sources; and
- different effects where there is a relationship between the effects and potentially an interaction.

Synergistic effects are a type of cumulative impact. These are effects where the cumulative impact may be greater or smaller than the sum of the separate effects. Cumulative impacts were considered in the appraisal in two ways:

- the potential for different developments to give rise to the same type of effect; and
- the potential for interaction between different types of effect.

In order to assess the cumulative impacts arising from the Early Partial Review, the appraisal considered the

overall effect of the Early Partial Review as a whole on each of the SA objectives. The results of this are summarised in table 8 and discussed in section 6.1.

Cumulative Impacts in Combination with Other Plans and Strategies

The appraisal has considered the potential for effects arising from other plans and strategies which, in combination with effects arising from the Early Partial Review, may give rise to significant impacts. The results of the review of other plans and strategies and their potential to give rise to cumulative effects is set out below.

The following key plans/programmes have been identified that could give rise to significant cumulative impacts together with the Early Partial Review:

- Kent Minerals and Waste Local Plan 2013-30, Kent County Council, July 2016;
- Pre-Submission Minerals Sites Plan, Kent County Council, November 2018;
- Kent Joint Municipal Waste Management Strategy (KJMWMS) 2012/13 to 2020/21, Kent Resource Partnership;
- Kent Joint Municipal Waste Management Strategy Draft Strategy 2018/19 to 2020/21, Kent Resource Partnership, March 2018;
- Ashford Local Plan Submission Version, Ashford Borough Council, December 2017;
- Canterbury District Local Plan, Canterbury City Council, July 2017;
- Dartford Core Strategy, Dartford Borough Council, June 2011;
- Core Strategy, Dover District Council, February 2010;
- Gravesham Local Plan Core Strategy, Gravesham Borough Council, September 2014;
- Maidstone Borough Local Plan, Maidstone Borough Council, October 2017;
- Core Strategy, Sevenoaks District Council, February 2011;
- Shepway Core Strategy, Folkestone and Hythe District Council, September 2013;
- The Swale Borough Local Plan, Swale Borough Council, July 2017;
- Pre-Submission Draft Local Plan to 2031, Thanet District Council, July 2018;
- Local Plan Regulation 19 Pre-Submission Publication, Tonbridge and Malling Borough Council, September 2018;
- Core Strategy Development Plan Document, Tunbridge Wells Borough Council, June 2010.

The main cumulative effects will arise in combination with the adopted KMWLP. The development management policies in the KMWLP will ensure that negative effects associated with minerals and waste activity will be avoided or mitigated and biodiversity benefits are realised. The KMWLP gives support to economic activity by ensuring a supply of materials which will be supported by the changes in the Early Partial Review. The support for movement of minerals via wharves and rail will be assisted by the change to infrastructure safeguarding in the Early Partial Review. The support for recycling of aggregates will counterbalance the enhanced mineral safeguarding in the Early Partial Review. The objective to restore

waste management sites to the highest possible standard to sustainable afteruses will be supported by the Early Partial Review requirement for the restoration of the Norwood Quarry landfill site.

The Early Partial Review will support the recycling targets in the adopted Kent Joint Municipal Waste Strategy 2012/13 to 2020/21 and in the consultation draft revision of the Strategy of March 2018.

There is the potential for cumulative effects to arise in combination with District and Borough Local Plans. Development on sites in Local Plans that contain safeguarded mineral resources or safeguarded minerals and waste facilities will be required by policies DM 7 and DM 8 to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision. The review of District and Borough Local Plans has shown that this is likely to arise in the case of all Boroughs and Districts apart from Maidstone and Swale.

Interrelationship Between Effects

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the Early Partial Review. This has been done as an integral part of the appraisal of the sites and options, and examples of this can be found throughout Section 6 and Annexes B and C of this report. The main interrelationships found through the appraisal are highlighted below.

Impacts on biodiversity can arise through habitat loss, disturbance from noise and human activity, changes to the water environment, reductions in air quality and deposition of dust and other pollutants. These impacts have the potential to act in synergy with each other such that multiple pressures have a greater total impact than the sum of individual impacts. These impacts also have the potential to negatively affect human amenity, along with visual impacts.

Restoration of the landfill site will be of benefit to biodiversity by ensuring connectivity and protection and enhancement of green infrastructure. It will also help to protect landscape quality and help to promote the wellbeing of communities.

Changes in air quality can have significant consequences for human health and biodiversity, while improvements in air quality arising from more sustainable transport patterns will benefit human health and vulnerable species and ecosystems.

Flood risk reduction will have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

The promotion of sustainable economic growth through provision of appropriate waste management facilities will help to sustain jobs and incomes and the wellbeing of communities. The economy and communities will be supported by the securing of mineral resources for construction and industry prior to other development.

7. How might we monitor the plan's impacts?

As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the Early Partial Review. These are set out in Table 9 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.

One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 9 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.

An Annual Monitoring Report is produced to monitor the implementation of the KMWLP, and the recommendations given below for monitoring should be incorporated within this.

Sustainabili	ty Objectives	Recommended Indicators					
1	Biodiversity	Area of land proposed for biodiversity value through landfill restoration					
_	Diodiversity	Area of land of biodiversity value created through restoration.					
		Percentage of waste managed at different levels of waste hierarchy, by					
		waste stream (LACW, C&I, CD&E):					
2	Climate change	Recycled/composted					
		Other recovery					
		Landfill.					
3	Community and	No practical indicators identified					
	well-being						
Sustainable		Sales (tonnage) of aggregates by type and end use					
4	economic	Capacity of waste facilities by type					
	growth						
5	Flood risk	Number of flood events per year					
6	Land	Hectares of good quality agricultural land proposed in restoration plans.					
0	Land	Hectares of good quality agricultural land created by restoration.					
	Landscape and	No practical indicators identified					
7	the historic						
	environment						
		Sales (tonnage) of aggregates at wharves					
8	Transport	Sales (tonnage) of aggregates at rail depots					
		Imports and exports (tonnages) of minerals across county boundary.					
9	Water	No of water pollution events linked to landfill sites.					

Table 9: Monitoring Recommendations

8. References

Related to SA of Kent MWLP (adopted 2016):

- AECOM, July 2016 Sustainability Appraisal (SA) of the Kent MWDF SA Adoption Statement
- Scott Wilson, March 2010 SA Scoping Report Introductory Paper URS, 2011 Interim SA Report (Assessment of Preferred Options)
- URS, November 2013 Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan SA Report (Consultation Draft)
- URS, July 2014 Kent County Council: Draft Minerals and Waste Local Plan 2013-30 Habitats Regulations Assessment
- URS, July 2014 Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan SA Report Non-Technical Summary

Other references:

- UK Government (2004) Environmental Assessment of Plans and Programmes Regulations 2004
- UK Government (2012) The Town and Country Planning (Local Planning) (England) Regulations 2012
- UK Government (2018) The National Planning Policy Framework
- Kent County Council (2016) Kent Minerals and Waste Local Plan 2013-30,
- Kent County Council (2018) Pre-Submission Minerals Sites Plan,
- Kent Resource Partnership, Joint Municipal Waste Management Strategy (KJMWMS) 2012/13 to 2020/21
- Kent Resource Partnership (2018) Kent Joint Municipal Waste Management Strategy Draft Strategy 2018/19 to 2020/21
- Swale Borough Council (2017) The Swale Borough Local Plan

Appendix A: Summary of Relevant Policy Objectives from National Planning Policy Framework 2018 and A Green Future

National Planning Policy Framework

Economy

Planning policies should:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Planning policies and decisions should enable:

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- the development and diversification of agricultural and other land-based rural businesses;
- it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable

Open space

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

Transport

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- the potential impacts of development on transport networks can be addressed;
- opportunities to promote walking, cycling and public transport use are identified and pursued;
- the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains

Planning policies should be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned.

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be or have been taken up,
 given the type of development and its location;
- safe and suitable access to the site can be achieved for all users; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Green Belt

Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it, including mineral extraction. Planning policies and decisions should recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

Flood risk

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.

Development should only be allowed in areas at risk of flooding where it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- the development is appropriately flood resistant and resilient;

- it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- any residual risk can be safely managed; and
- safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Natural environment

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Heritage assets

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Minerals

Planning policies should:

 provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;

so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of

primary materials, whilst aiming to source minerals supplies indigenously;

safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies

so that known locations of specific minerals resources of local and national importance are not

sterilised by non-mineral development where this should be avoided (whilst not creating a

presumption that the resources defined will be worked);

set out policies to encourage the prior extraction of minerals, where practical and environmentally

feasible, if it is necessary for non-mineral development to take place;

safeguard existing, planned and potential sites for: the bulk transport, handling and processing of

minerals; the manufacture of concrete and concrete products; and the handling, processing and

distribution of substitute, recycled and secondary aggregate material;

set out criteria or requirements to ensure that permitted and proposed operations do not have

unacceptable adverse impacts on the natural and historic environment or human health, taking into

account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a

locality;

when developing noise limits, recognise that some noisy short-term activities, which may otherwise be

regarded as unacceptable, are unavoidable to facilitate minerals extraction; and

ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and

that high quality restoration and aftercare of mineral sites takes place.

Waste

The Framework should be read in conjunction with the Government's planning policy for waste.

A Green Future: Our 25 Year Plan to Improve the Environment

Using and managing land sustainably

Embedding an 'environmental net gain' principle for development, including housing and

infrastructure

Improving how we manage and incentivise land management, including designing and delivering a

new environmental land management system

Improving soil health and restoring and protecting our peatlands, including developing better

information on soil health

Project Name: Regulation 19 Consultation

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Document Title: Sustainability Appraisal Report – SA of the Grage 45 tial Review of the Kent Minerals and Waste Plan

- Focusing on woodland to maximise its many benefits
- Reducing risks from flooding and coastal erosion, including expanding the use of natural flood management solutions and putting in place more sustainable drainage systems

Recovering nature and enhancing the beauty of landscapes

- Protecting and recovering nature, including developing a Nature Recovery Network and providing opportunities for the reintroduction of native species
- Conserving and enhancing natural beauty, including reviewing National Parks and Areas of Outstanding Natural Beauty
- Respecting nature in how we use water and reforming our approach to water abstraction

Connecting people with the environment to improve health and wellbeing

- Helping people improve their health and wellbeing by using green spaces
- Creating more green infrastructure

Increasing resource efficiency and reducing pollution and waste

- Maximising resource efficiency and minimising environmental impacts at end of life.
 - Reducing food supply chain emissions and waste
 - o Improving management of residual waste
 - Reducing the impact of wastewater
- · Reducing pollution
 - Publishing a Clean Air Strategy
 - Curbing emissions from combustion plants and generators
 - Minimising the risk of chemical contamination in our water
 - Ensuring we continue to maintain clean recreational waters and warning about temporary pollution

Appendix B: SA of Policy Changes in Early Partial Review

Key

Impacts	Probability of effects	Direct or indirect effects	Reversibility
++ significant positive effect	L low probability	D direct effect	Y reversible effect
+ some positive effect	M medium probability	I indirect effect	N not reversible i.e. permanent effect
0 no effect	H high probability		
- some adverse effect			
significant adverse effect			
? uncertain effect			

Policy CSW4: Strategy for Waste Management Capacity. Reduces targets for percentage of waste going to landfill and for recycling/composting and increases targets for percentage of waste going for other recovery

	Sustainability Objective	Comments						
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		+	+	+	М	I	Y	
1	Biodiversity	thereby red	ucing the pre	essure for ne	w mineral si	tes with redu	uced adverse	ore help to reduce the demand for virgin aggregates, impacts on biodiversity. However, the amended lition waste than the current policy.
2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	
		+/?	+/?	?	М	D	Y	

		upon clir	The amended policy will encourage increased reuse, recycling and recovery and therefore should have an overall positive impact upon climate change by reducing demand on resources and production of greenhouse gases. Increased recycling may increase the need for waste transport but the increase is not likely to be significant for the county as a whole.										
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		+	+	?	М	I	Υ						
3	Community and well-being	the polici	y. By po	romoting	g increased avoid a	sed recyclin amenity imp	g, the popacts on	amenity and wellbeing as no new facilities are required to be developed by blicy will help to encourage the supply of recycled aggregates to support communities from new mineral developments, although by lowering the ng of aggregates than under the current policy.					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
	Sustainable	++	++	?	М	D	Υ						
4	economic growth	activity.	Encour	agement	t of incre	eased recyc	ling of aç	ibute towards meeting agreed targets and support sustainable economic ggregates will reduce the demand upon non-renewable resources, however recycling of construction and demolition waste than the current policy					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
5	Flood risk	0	0	0	Н	I	N						
		This cha	nge in p	olicy is r	not spec	ific to any p	particular	sites, therefore is unlikely to have a demonstrable effect upon flood risk.					
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?						
		0	0	?	Н	D	N						

				-		kely to have required.	e a signif	icant effect on greenfield or Green Belt land or land with sensitive geology
	Landscape and	Short 0	Med 0	Long ?	Prob H	Dir/Ind D	Rev?	
7	the historic environment	The ame		to polic	uy is unli	kely to have	e a signif	 icant effect on landscape or historic assets as no new developments will be
		Short	Med	Long	Prob	Dir/Ind	Rev?	
	Transport	?	?	?	L	D	N	
8		scale of	the likel	y effect	is not cl	ear, but it i	s unlikely	to encourage additional vehicle movements to transport recyclables. The to be significantly greater than managing waste at the bottom of the wastements within the county overall.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
9	Water	0	0	Ş	Н	D	N	
		The ame		to polic	cy is unli	kely to have	e a signif	icant effect on water quality and availability as no new developments will be

Policy CSW5: Strategic Site for Waste. Requires it to be demonstrated that the site can be suitably restored in the event that landfilling of hazardous (flue) dust ash residues from Energy from Waste plants were to cease before completion of the final landform. Deletes the requirement for an assessment of alternative management methods for flue ash.

	Sustainability Objective	Comment	Comments											
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?					
		(0	+	?		L	I	N					
1	Biodiversity	The amendment to the policy requires suitable early restoration of the site in the event that landfill would cease before the final												
		landform is complete. This may help to secure biodiversity benefits from restoration if the landfill is not complete. These												
		benefits a	re likel	y to be s	secured	earlier tha	n with c	original plar	ns.					
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?					
2	Climate change	0		0	0									
		Amendment to the policy will not affect climate change impacts of waste management.												
		Short	Med	Long	Prob	Dir/Ind	Rev?							
	Community and	0	?	+	М	I	N							
3	well-being	By requiri	ng suit	able ear	y restor	ation of th	e site ir	the event	that landfil	Il would cease before the final landform is complete, the				
		policy will	help to	o mitigat	e any a	dverse imp	acts on	local resid	ential prope	erties arising from operations at the landfill from noise,				
		dust and I	dust and light and visual impacts from an unrestored site.											
4		Short	Med	Long	Prob	Dir/Ind	Rev?							
		0	0	0										

	Sustainable Restoration of the landfill is unlikely to affect sustainable economic growth. Not undertaking an assessment of alternative													
	economic	management methods for flue ash is unlikely to affect sustainable economic growth as significant tonnages are already												
	growth	managed through alternative routes.												
		Short	Med	Long	Prob	Dir/Ind	Rev?							
5	Flood risk	0	0	0				-						
		The ame	ndment	to polic	y will no	t affect floo	od risk.	<u></u>						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
6	Land	0	0	0										
		The ame	ndment	to polic	y will no	t affect the	e efficient	t use of land or sensitive geomorphology						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
,	Landscape and	0	+	+	Н	D	N							
7	the historic environment	By requiring suitable early restoration of the site in the event that landfill would cease before the final landform is complete, the												
			•	-		•	•	om the site and enable landscape benefits of restoration to be ensured. from the amended policy.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
8	Transport	0	0	0										
					-	•		els of vehicle movements and therefore is unlikely to have a significant modes of transport.						

	Short	Med	Long	Prob	Dir/Ind	Rev?	
9 Water	0	0	0				
			-	-		•	sites to be developed and not result in any changes to the water vater quality or availability.

CSW6: Location of built waste management facilities Removes reference to sites to be identified in the WSP

	Sustainability Objective	Commer	nts												
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?						
1	Biodiversity	0	0 0		0	0									
		The change to the policy will have no effect on biodiversity.													
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?						
2	Climate change	0		0	0										
		The chai	nge to t	he policy	will hav	ve no effec	t on cli	mate chan	ge.						
	Community and	Short	Med	Long	Prob	Dir/Ind	Rev								
3	well-being	0	0	0											
		The chai	nge to t	he policy	will hav	ve no effec	t on co	mmunity a	and wellbeir	ng.					
	Sustainable	Short	Med	Long	Prob	Dir/Ind	Rev)							
4	economic	0	0	0											
	growth	The chai	nge to t	he policy	will hav	ve no effec	t on su	stainable (economic gr	rowth.					
		Short	Med	Long	Prob	Dir/Ind	Rev								
5	Flood risk	0	0	0											
		No effec	t on floo	od risk fr	om char	nge to the									
		Short	Med	Long	Prob	Dir/Ind	Rev								

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	the state of the s			1				
6	Land	0	0	0				
		No effect	t on lan	d use fro	m chan	ge to the p	oolicy	
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?	
7	the historic	0	0	0				
	environment	No effec	t on lan	dscape a	and the	historic env	/ironment	t from change to the policy
		Short	Med	Long	Prob	Dir/Ind	Rev?	
8	Transport	0	0	0				
		No effect	t on trai	nsport fr	om chai	nge to the p	policy	
		Short	Med	Long	Prob	Dir/Ind	Rev?	
9	Water	0	0	0				
		No effect	t on wat	er quali	ty and s	ustainable	water res	source management from change to the policy
		140 CITEC	C OII WA	ci quali	cy unu s	astaniable	water res	boarde management from change to the policy

Policy CSW7: Waste management for non-hazardous waste Removes figures for capacity gap and adds a requirement to move waste up the hierarchy

	Sustainability Objective	Comment	:S									
		Short	Me	ed	Long	Prok)	Dir/Ind	Rev?			
		+ +		+	+ M		I	Υ				
1	Biodiversity	recycling of reducing t	of cons the pre	struction ssure fo	and dei	molition w	aste as elopme	recycled agent and avo	ggregate wh	ts and residues. This should help to encourage sich may reduce the demand for virgin materials thereby ts on biodiversity from new sites. The policy does not impacts on biodiversity from waste developments.		
		Short	Me	ad.	Long	Prok	,	Dir/Ind	Rev?			
		+	IVIC	+	torig +		, М	Dilyilla	Y			
2	Climate change	The change in policy aims to move waste up the hierarchy and therefore should have an overall positive impact upon climate										
		change by	reduc	ing dem	and on	resources	and pr	oduction of	greenhouse	e gases. Increased recycling may increase the need for inty as a whole.		
		Short	Med	Long	Prob	Dir/Ind	Rev	?				
	Community and	+	+	+	М	I	Y					
By promoting increased recycling, the policy will help to encourage the supply of recycled aggregates to support I construction. The amendments to the policy will not change the likely impacts of waste management on the well communities.												
4		Short	Med	Long	Prob	Dir/Ind	Rev	?				
		+	+	+	Н	D	Y					

	Sustainable	The police	The policy seeks to promote reuse and recycling of materials and energy recovery which will contribute to moving towards the											
	economic	circular e	economy	y. Increa	sed reu	se / recyclii	ng will co	ntribute towards meeting agreed targets, and identification and separation						
	growth	of recycl	of recycled aggregate will reduce the demand upon non-renewable resources.											
		Short	Med	Long	Prob	Dir/Ind	Rev?							
5	Flood risk	0	0	0										
		This cha		oolicy is i	not spec	ific to any p	particular	sites or the effects of development, therefore is unlikely to have any effect						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
6	Land	0	0	0										
		The police	y does	not deal	with th	e location o	of facilitie	s and therefore will have no impact on land use.						
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?							
7	the historic	0	0	0										
	environment	This cha	nge in p	olicy is i	not spec	ific to any p	particular	sites or the effects of development, therefore is unlikely to have any effect						
		upon lan	dscape	or the h	istoric e	nvironment	•							
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		?	?	0	М	D	Y							
8	Transport	By prom	oting in	creased	recycling	g, the policy	y is likely	to encourage additional vehicle movements to transport recyclables. The						
		scale of	the likel	y effect	is not cl	ear, but it i	s unlikely	to be significantly greater than managing waste at the bottom of the waste						
		hierarchy	, partic	ularly ir	the cor	ntext of ver	nicle mov	ements within the county overall.						

		Short	Med	Long	Prob	Dir/Ind	Rev?	
9 Wa	ater	0	0	0				
				olicy doe	s not ac	ddress the I	ocations	or effects of development therefore is unlikely to affect water quality
		availabilit	ty.					

Policy CSW8: Other recovery facilities for non-hazardous waste Removes reference to sites to be identified in the WSP and adds a requirement for recovery of heat

	Sustainability Objective	Commen	omments												
		Short	Me	ed .	Long	Prob		Dir/Ind	Rev?						
1	Biodiversity	+		+		? M		I	Y						
	blodiversity	By promoting energy recovery and recovery of heat, the policy will help to miminise greenhouse gas emissions which will contribute to reducing the pressure on biodiversity from climate change.													
		Short	Ме	ed	Long	Prob		Dir/Ind	Rev?						
2	Climate change	+		+	+	M		D	Y						
	Samue Glunge		The change in policy promotes energy recovery and the recovery of heat, which will promote minimisation of climate change impacts arising from non-hazardous waste recovery facilities.												
		Short	Med	Long	Prob	Dir/Ind	Rev?								
3	Community and	+	+	+	М	I	Υ								
	well-being	' '	_		•	nd recovery e and could		•		y will contribute to reducing the adverse effects on					
	Custainable	Short	Med	Long	Prob	Dir/Ind	Rev?								
4	Sustainable economic	+	+	+	Н	D	N								
	growth		_		-	nd recovery tion to sust		•		y will contribute to recovering resources from waste					
		Short	Med	Long	Prob	Dir/Ind	Rev?								

		+	+	+	М	I	N	
5	Flood risk		_		-			the change to policy will contribute to reducing climate change impacts to reducing the risks of flooding.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
6	Land	0	0	0				
		The ame	endment	t to polic	cy is unre	elated to la	nd use.	
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?	
7	the historic	0	0	0				
	environment	The ame	endment	t to polic	y is unre	elated to pr	otection	and enhancement of landscape and the historic environment.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
8	Transport	0	0	0				
		The ame	endment	t to polic	y is unre	elated to su	ıstainable	e transport objeictves.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
9	Water							
		The ame	ndment	t to polic	v is unre	elated to m	aintenan	ce and improvement of water quality or sustainable water resource

Policy CSW12 Identifying sites for Hazardous waste. Removes reference to a site to be identified in the WSP for landfilling of asbestos waste

	Sustainability Objective	Commen	its													
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?							
1	Biodiversity	0		0	0											
		No effect	No effect on biodiversity from change to the policy													
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?							
2	Climate change	0		0	0											
		No effect	t on clin	nate cha	inge fror	n change t	o the p	olicy								
	Community and	Short	Med	Long	Prob	Dir/Ind	Rev?									
3	well-being	0	0	0												
		No effect	t on cor	nmunity	and we	llbeing fron	n chang	e to the p	olicy							
	Sustainable	Short	Med	Long	Prob	Dir/Ind	Rev?									
4	economic	0	0	0												
	growth	No effect	t on sus	stainable	econom	nic growth	from ch	ange to th	e policy							
		Short	Med	Long	Prob	Dir/Ind	Rev?									
5	Flood risk	0	0	0												
		No effect	t on floo	od risk fr	om chai	nge to the	policy									
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev?									
		0	0	0												

		No effec	t on lan	d use fro	om chan	ge to the p	olicy
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?
7	the historic	0	0	0			
	environment	No effec	t on lan	dscape a	and the	historic env	rironmen
		Short	Med	Long	Prob	Dir/Ind	Rev?
8	Transport	0	0	0			
		No effec	t on tra	nsport fr	om cha	nge to the p	oolicy
		Short	Med	Long	Prob	Dir/Ind	Rev?
9	Water	0	0	0			
			I				1
		No effec	t on wa	ter quali	ty and s	ustainable	water res

Policy CSW14 Disposal of Dredgings Removes reference for a site to be identified in the WSP for disposal of dredgings

	Sustainability Objective	Commer	nts												
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?						
1	Biodiversity	0		0	0										
		No effec	No effect on biodiversity from change to the policy												
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?						
2	Climate change	0		0	0										
		No effec	t on clir	nate cha	nge fror	n change t	o the p	olicy	•						
	Community and	Short	Med	Long	Prob	Dir/Ind	Rev	?							
3	well-being	0	0	0											
		No effec	t on cor	nmunity	and we	llbeing fron	n chan	ge to the p	olicy						
	Sustainable	Short	Med	Long	Prob	Dir/Ind	Rev	?							
4	economic	0	0	0											
	growth	No effec	t on sus	stainable	econom	nic growth	from cl	nange to th	e policy						
		Short	Med	Long	Prob	Dir/Ind	Rev	?							
5	Flood risk	0	0	0											
		No effec	t on flo	od risk fr	om char	nge to the	policy								
6	Land	Short	Med	Long	Prob	Dir/Ind	Rev	?							
		0	0	0											

		No effec	t on lan	d use fro	om chan	ge to the p	olicy
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?
7	the historic	0	0	0			
	environment	No effec	t on lan	dscape a	and the	historic env	rironmen
		Short	Med	Long	Prob	Dir/Ind	Rev?
8	Transport	0	0	0			
		No effec	t on tra	nsport fr	om chai	nge to the p	oolicy
		Short	Med	Long	Prob	Dir/Ind	Rev?
9	Water	0	0	0			
			1	1	I	ı	1
		No effec	t on wa	ter quali	ty and s	ustainable	water res

Policy DM 7 Safeguarding Mineral Resources Strengthens the requirement on sites allocated in adopted local development plans to avoid needless sterilisation of minerals

	Sustainability Objective	Commer	nts							
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?	
1	Biodiversity	0		0	0	0				
		No effec	t on bio	diversity	from ch	nange to the	e polic	у		
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?	
2	Climate change	0		0	0					
		No effec	t on clir	nate cha	nge fror	n change to	o the p	olicy		
		Short	Med	Long	Prob	Dir/Ind	Rev	?		
3	Community and	++	++	?	Н	D	Y			
	well-being		•			nineral reso to sustain (needlessly	sterilised. This will help to ensure the supply of minerals
	6	Short	Med	Long	Prob	Dir/Ind	Rev	?		
4	Sustainable economic	++/-	++/-	?	Н	D	Y			
	growth		•						•	sterilised. This will help to ensure the supply of minerals on-renewable resources is not sustainable.
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev	?		
		0	0	0						

		No effec	t on floo	od risk fr	om chai	nge to the	policy
		Short	Med	Long	Prob	Dir/Ind	Rev?
6	Land	0	0	0			
		No effec	t on lan	d use fro	om chan	ge to the p	olicy
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?
7	the historic	0	0	0			
	environment	No effec	t on lan	dscape a	and the	historic env	vironmen
		Short	Med	Long	Prob	Dir/Ind	Rev?
8	Transport	0	0	0			
		No effec	t on tra	nsport fr	om chai	nge to the	policy
		Short	Med	Long	Prob	Dir/Ind	Rev?
9	Water	0	0	0			
-			I	1	ı	ı	ı
		No effec	t on wa	ter quali	ty and s	ustainable	water res

Policy DM 8 Safeguarding Minerals Management, Transportation, Production and Waste Management Facilities Strengthens requirements on sites allocated in a local development plan to strengthen safeguarding of minerals and waste infrastructure

	Sustainability Objective	Commer	nts							
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?	
1	Biodiversity	0		0	0					
		No effec	t on bio	diversity	from ch	nange to the	policy	У		
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?	
2	Climate change	0		0	0					
		No effec	No effect on climate cha			n change to	the p	olicy		
		Short	Med	Long	Prob	Dir/Ind	Rev)		
	Community and	++	++	?	Н	D	Υ			
3	well-being	•	f minera	als to su	oport ho					needlessly lost. This will help to ensure the economic ities and that waste management infrastructure is in place
		Short	Med	Long	Prob	Dir/Ind	Rev?)		
	Sustainable	++/-	++/-	?	Н	D	Υ			
4	economic growth	economi	c supply	of mine	erals and		nagem	ent infrasti		t be needlessly lost. This will help to ensure the support economic/industrial activity. However, the
		Short	Med	Long	Prob	Dir/Ind	Rev?)		

				1	1		_	
5	Flood risk	0	0	0				
		No effec	t on floo	od risk fr	om chai	nge to the p	oolicy	
		Short	Med	Long	Prob	Dir/Ind	Rev?	
6	Land	0	0	0				
		No effec	t on lan	d use fro	om chan	ge to the p	olicy	
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?	
7	the historic	0	0	0				
	environment	No effec	t on lan	dscape a	and the	historic env	rironment	rom change to the policy
		Short	Med	Long	Prob	Dir/Ind	Rev?	
8	Transport	++	++	++	М	D	Y	
		By ensur	ing that	t waste a	and mine	erals transp	ort infras	ructure is not needlessly lost, the change to policy will help to ensur
		waste ar	nd mine	rals can	travel e	conomically	and will	elp to promote the use of sustainable modes of transport.
		1			T = .	D: /7	15.3	
		Short	Med	Long	Prob	Dir/Ind	Rev?	

Appendix C: Detailed Findings of Alternatives to Early Partial Review as Proposed

Key:

Impacts	Probability of effects	Direct or indirect effects	Reversibility
++ significant positive effect	L low probability	D direct effect	Y reversible effect
+ some positive effect	M medium probability	I indirect effect	N not reversible i.e. permanent effect
0 no effect	H high probability		
- some adverse effect			
significant adverse effect			
? uncertain effect			

Option A: Allocate Sites for Waste Management.

	Sustainability Objective	Comments												
		Short	Med	Long	Prob	Dir/Ind	Rev?							
1	Biodiversity	?	?	?	L	D	N							
	Allocation of waste sites may have adverse impacts on biodiversity, but these will be dependent on the nature, scallocation of sites which is unknown.													
		Short	Med	Long	Prob	Dir/Ind	Rev?							
2	Climate change	?	?	?	L	I	N							
			Allocation of waste sites which are not required for Kent's waste may increase the climate change impacts of waste management although the likelihood of impacts is unclear. Waste management facilities may be built that then need to source											

Project Name: Regulation 19 Consultation **Document Title:** Sustainability Appraisal Report – SA of the draft Early Partial Review of the Kent Minerals and Waste Plan

		waste st	reams fi	rom outs	ide the	county, wh	ich would	d increase greenhouse gas emissions from waste transport. Alternatively, if			
		there are	e insuffi	cient loca	al sourc	es of waste	, the faci	lities may simply not be built.			
		Short	Med	Long	Prob	Dir/Ind	Rev?				
		?	?	?	L	D	N				
3	Community and well-being	and wast Allocation likelihood county, i	te trans n of was d of imp ncreasir	port, but ste sites acts is u	which anclear.	will be depe re not requ Waste mar that waste	ndent or ired for lagement is transp	on communities in the locality of sites from waste management activities the nature, scale and location of sites which is unknown. Kent's waste may increase the distance waste is transported, although the tracilities may be built that then source waste streams from outside the corted which could have impacts on air quality. Alternatively, if there are simply not be built.			
4	Sustainable economic growth	Kent's ed	conomy from ou	although	n the like	elihood of in	mpacts is	Kent's waste may increase the economic contribution of the waste sector to unclear. Waste management facilities may be built that then source waste nomic resource into the county. Alternatively, if there are insufficient local ilt.			
5	Flood risk Flood risk Short Med Long Prob Dir/Ind Rev? ? ? L D N Allocation of waste sites may have adverse or beneficial impacts on flood risk in the locality of sites, but these will be dependent on the nature, scale and location of sites which is unknown.										
		Short	Med	Long	Prob	Dir/Ind	Rev?				

		?	?	?	L	D	N	
6	Land							on the efficient use of land and on sensitive locations, but these will be which is unknown.
7	Landscape and the historic environment				•	Dir/Ind D ve adverse is unknowr	•	on landscape and historic assets, but these will be dependent on the natur
8	Transport	likelihood	d of imp	acts is u	inclear. istances	Waste mar	nagemen is transp	Kent's waste may increase the distance waste is transported, although the tracilities may be built that then source waste streams from outside the corted which could have impacts on air quality, greenhouse gas emissions as sufficient local sources of waste, the facilities may simply not be built.
9	Water					Dir/Ind D ve adverse is unknowr		on water quality and availability, but these will be dependent on the nature

Option B1: Retain existing waste hierarchy targets.

	Sustainability Objective	Commen	ts											
		Short	М	ed	Long	Prob		Dir/Ind	Rev?					
1	Biodiversity		?	?	?	l	-	I	N					
_	J.California,	The impact of the option on biodiversity is unclear, but impacts from waste management are more strongly dependent on how waste is managed at individual sites and where those sites are, which is not addressed by policy CSW4.												
		Short	М	ed	Long	Prob		Dir/Ind	Rev?					
2		?		?	?	L	-	D	N					
	Climate change	greenhou energy ro	use gas	emission	ns throu	gh greater reby increa	resou sing g	rce efficienc	y, whereas	t than the Partial Review will encourage reduced s a higher landfill target would reduce the capacity for ons. The overall balance of impacts is not known.				
		Short	Med	Long	Prob	Dir/Ind	Rev	?						
3	Community and well-being	0	0	0										
		Retaining the waste hierarchy targets from the adopted KMWLP is unlikely to affect communities and wellbeing.												
		Short	Med	Long	Prob	Dir/Ind	Rev	?						
	Sustainable	?	?	?	М	D	Y							
4	economic growth	sustainal	ole was	te mana	gement	which will o	contrib	oute to the o	ounty's ec	ecycling target than the Partial Review will support more conomy, whereas a higher landfill target would make at can be recovered from waste. The overall balance of				

		Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0				
5	Flood risk	The impa	act of th	e option	on floo	d risk is un	clear in v	iew of the uncertainty about the climate change effect of retaining the
			-			-		ore strongly dependent on how individual waste sites are developed and
		where th	ose site	es are, w	hich is r	not address	ed by po	icy CSW4.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
6	Land	0	0	0				
		Waste hi	l ierarchy	targets	will hav	l e no signific	cant effe	t on the efficient use of land or sensitive locations.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
7	Landscape and the historic	0	0	0	1102	2,2	11011	
,	environment							
	Chivitoriment	Waste hi	erarchy	targets	will hav	e no signific	cant effe	ct on landscape and historic assets.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		?	?	?	L	I	Y	
8	Transport	By prom	oting in	creased	recyclin	g, the highe	er targets	are likely to encourage additional vehicle movements to transport
		recyclabl	les. The	e scale o	f the lik	ely effect is	not clea	, but it is unlikely to be significantly greater than managing waste at other
		levels of	the was	ste hiera	rchy, pa	rticularly in	the conf	ext of vehicle movements within the county overall.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		?	?	?	L	I	N	
9	Water			<u> </u>				
		The impa	act of th	ne option	on wat	er quality a	nd availa	bility is unclear, but impacts from waste management are more strongly
		depende	nt on h	ow wast	e is mar	naged at inc	lividual s	tes, particularly landfill, and where those sites are, which is not addresse

amey	CONSU	llfi	inc
arricy	COI 130		

		by polic	y CSW	4									
		by polic	y CJVV	т.									
			•										

Option B2: Retain targets for recycling and reduce targets for landfill.

	Sustainability Objective	Comment	ts .													
		Short	Ме	ed	Long	Prob)	Dir/Ind	Rev?							
			+	+	?		L	I	N							
1	Biodiversity	impacts fi	The option could have a positive effect on biodiversity by reducing the pressures arising from climate change. However, impacts from waste management are more strongly dependent on how waste is managed at individual sites and where those sites are, which is not addressed by policy CSW4.													
		Short	Мє	ed	Long	Prob)	Dir/Ind	Rev?							
	Climate change	+		+			М	I	N							
2		reduced g	greenho	ouse gas	emissio	•	h greate	r resource		ycling target than the Partial Review will encourage , whereas a lower landfill target will enable energy						
		Short	Med	Long	Prob	Dir/Ind	Rev?									
	Community and	+	+	?	М	D	Y									
3	well-being		enefits	for com			_		_	ontribute to a reduction in flood risk which will have re strongly dependent on how sites are developed and						
4		Short	Med	Long	Prob	Dir/Ind	Rev?									
		++	++	?	Н	D	Y									

	Sustainable economic growth	The option will have a positive impact on sustainable economic growth. A higher recycling target than the Partial Review will promote more sustainable waste management and innovation, while a lower landfill target than the KMWLP will facilitate the recovery of resources from waste and reduce the need for unsustainable landfill.												
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		+	+	+	L	I	N	<u>-</u>						
5	Flood risk		ment ar	e more s	strongly	•		k by reducing greenhouse gas emissions, but impacts from waste individual waste sites are developed and where those sites are, which is not						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
6	Land	0	0	0				-						
		Waste h	ierarchy	targets	will hav	e no signifi	cant effe	ect on the efficient use of land or sensitive locations.						
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?							
7	the historic	0	0	0				<u>-</u>						
	environment	Waste h	ierarchy	targets	will hav	e no signifi	cant effe	oct on landscape and historic assets.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		?	?	?	L	I	Y	<u>-</u>						
8	Transport	recyclab	les. The	e scale o	f the like	ely effect is	not clea	s are likely to encourage additional vehicle movements to transport or, but it is unlikely to be significantly greater than managing waste at other text of vehicle movements within the county overall.						

		Short	Med	Long	Prob	Dir/Ind	Rev?	
		?	?	?	L	I	N	
9	Water							
		•		•		. ,		pility is unclear, but impacts from waste management are more strongly
		•			e is man	aged at ind	ividual s	tes, particularly landfill, and where those sites are, which is not address
		by policy	CSW4.					

Option C: Do not change safeguarding policies DM7 and DM8

	Sustainability Objective	Comment	S												
		Short	Me	d	Long	Prob	I	Dir/Ind	Rev?						
1	Biodiversity	0		0	0										
		Retaining the safeguarding approach in policies DM 7 and DM 8 is unlikely to affect biodiversity.													
		Short	Ме	ed	Long	Prob	I	Dir/Ind	Rev?						
		-		-	-	M	1	D	N						
2	Climate change	Retaining	the sa	feguardi	ing appr	oach in poli	cy DM	7 is unlike	y to affec	t the climate change impacts of mineral extraction.					
		transporte	ed in a	less eco	nomical	ly efficient	manner	than other	erwise, an	ling policy is likely to result in minerals and waste being d may result in the loss of sustainable modes of transport emissions from waste and minerals transport.					
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	-	М	D	N								
		Retaining	Retaining the safeguarding approach in policy DM 7 is likely to reduce the availability of primary aggregates available to support												
3	Community and	housing g	rowth.	Loss of	f transpo	ortation infr	astructı	ure throug	h weak sa	afeguarding in policy DM 8 is likely to result in minerals					
	well-being		and waste being transported in a less economically efficient manner than otherwise, and may result in the loss of sustainable												
		modes of transport for materials, both of which would result in increased greenhouse gas emissions from waste and minerals													
		_	•	-		e impacts o	n air qu	ality altho	ugh the s	ignificance of air quality impacts is uncertain and to some					
		extent loc	.auon-c	iepende	IIC.										
4		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	?	М	D/I	N								

	Sustainable economic growth	economi	c and in mineral	dustrial s and w	activity. aste bei	Loss of transpor	ansportated in a	is likely to reduce the availability of primary aggregates available to support tion infrastructure through weak safeguarding in policy DM 8 is likely to less economically efficient manner than otherwise, which will increase the the waste sector and the wider economy.						
		-	-	-	L	I	N	-						
5	Flood risk	than if in	nfrastrud	cture we	re retair	ned, which i	may incre	safeguarding policy is likely to result in greater greenhouse gas emissions ease flood risk impacts. However, the flood risk impacts from waste individual waste sites are developed and where those sites are.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
6	Land	0	0	0										
		There are unlikely to be significant impacts on land use from the safeguarding policy approach.												
	Landscape and	Short	Med	Long	Prob	Dir/Ind	Rev?							
7	the historic	0	0	0										
	environment	No effect on landscape and the historic environment from the safeguarding policy approach.												
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		-	-	-	Н	D	N							
8	Transport	Loss of transportation infrastructure through weak safeguarding policy is likely to result in less sustainable transport movements greater transport distances and potentially the use of less sustainable modes of transport for materials through the loss of sustainable transport infrastructure.												

Appendix D: Contribution of Other Plans and Strategies to Cumulative Effects

Kent Minerals and Waste Local Plan 2013-30, Kent County Council, July 2016

The Plan identifies and sets out the following for the period up to, and including, the year 2030:

- the long term Spatial Vision and Strategic Objectives for Kent's minerals and waste
- the delivery strategy for minerals and waste planning that identifies how the objectives will be achieved in the plan period
- two areas where strategic mineral and waste development is likely to occur
- the development management policies that will be used when the County Council makes decisions on planning applications
- the framework to enable annual monitoring of the policies within the Plan

The Plan will be mainly used by the County Council when determining applications for minerals and waste facilities.

Planning for Minerals in Kent will:

- Seek to deliver a sustainable, steady and adequate supply of land-won minerals including aggregates, silica sand, crushed rock, brickearth, chalk and clay, building stone and minerals for cement manufacture.
- Facilitate the processing and use of secondary and recycled aggregates and become less reliant on land-won construction aggregates.
- Safeguard economic mineral resources for future generations and all existing, planned and potential
 mineral transportation and processing infrastructure (including wharves and rail depots and
 production facilities).
- Restore minerals sites to a high standard that will deliver sustainable benefits to Kent communities.

Planning for Waste in Kent will:

- Move waste up the Waste Hierarchy, reducing the amount of non-hazardous waste sent to landfill.
- Encourage waste to be used to produce renewable energy incorporating both heat and power if it cannot be re-used or recycled.
- Ensure waste is managed close to its source of production.
- Make provision for a variety of waste management facilities to ensure that Kent remains at the forefront of waste management with solutions for all major waste streams, while retaining flexibility to adapt to changes in technology.

- Ensure sufficient capacity exists to meet the future needs for waste management.
- Restore waste management sites to a high standard that will deliver sustainable benefits to Kent communities.

General objectives for the Minerals and Waste Local Plan:

- Encourage the use of sustainable modes of transport for moving minerals and waste long distances and minimise road miles.
- Ensure minerals and waste developments contribute towards the minimisation of, and adaptation to,
 the effects of climate change. This includes helping to shape places to secure radical reductions in
 greenhouse gas emissions and supporting the delivery of renewable and low carbon energy and
 associated infrastructure.
- Ensure minerals and waste sites are sensitive to both their surrounding environment and communities, and minimise their impact on them.
- Enable minerals and waste developments to contribute to the social and economic fabric of their communities through employment opportunities.

Objectives for minerals:

- Seek to ensure the delivery of adequate and steady supplies of sand and gravel, chalk, brickearth, clay, silica sand, crushed rock, building stone and minerals for cement during the plan period, through identifying sufficient sites and safeguarding mineral bearing land for future generations.
- Promote and encourage the use of recycled and secondary aggregates in place of land-won minerals.
- Safeguard existing, planned and potential sites for mineral infrastructure including wharves and rail
 depots across Kent to enable the on-going transportation of marine dredged aggregates, crushed
 rock and other minerals as well as other production facilities.
- Enable the small-scale, low-intensity extraction of building stone minerals for heritage building products.
- Restore minerals sites to the highest possible standard to sustainable afteruses that benefit the Kent
 community economically, socially or environmentally. Where possible, afteruses should conserve and
 improve local landscape character and incorporate opportunities for biodiversity to meet targets
 outlined in the Kent Biodiversity Action Plan, the Biodiversity Opportunity Areas and the Greater
 Thames Nature Improvement Area.
- Encourage the sustainable use of the inert non-recyclable raction of Construction, Demolition and Excavation Waste for quarry restoration.

Objectives for waste:

Increase amounts of Kent's waste being re-used, recycled or recovered. Promote the movement of

waste up the Waste Hierarchy by enabling the waste industry to provide facilities that help to deliver a major reduction in the amount of Kent's waste being disposed of in landfill.

- Promote the management of waste close to the source of production in a sustainable manner using
 appropriate technology and, where applicable, innovative technology, such that net self sufficiency is
 maintained throughout the plan period.
- Use waste as a resource to provide opportunities for the generation of renewable energy for use within Kent through energy from waste and technologies such as gasification and aerobic/anaerobic digestion.
- Provide suitable opportunities for additional waste management capacity to enable waste to be managed in a more sustainable manner.
- Restore waste management sites to the highest possible standard to sustainable afteruses that
 benefit the Kent community economically, socially or environmentally. Where possible, afteruses
 should conserve and improve local landscape character and incorporate opportunities for biodiversity
 to meet targets outlined in the Kent Biodiversity Action Plan, the Biodiversity Opportunity Areas and
 the Greater Thames Nature Improvement Area.

Mineral working for sand will be granted planning permission at sites identified in the Minerals Sites Plan subject to meeting the requirements set out in the relevant site schedule in the Mineral Sites Plan and the development plan.

Economic mineral resources are safeguarded from being unnecessarily sterilised by other development by the identification of Mineral Safeguarding Areas and Mineral Consultation Areas.

The strategy for waste management capacity in Kent is to provide sufficient waste management capacity to manage at least the equivalent of the waste arising in Kent plus some residual non-hazardous waste from London. As

The proposed extension areas for Norwood Quarry and Landfill Site, Isle of Sheppey are together identified as the Strategic Site for Waste in Kent.

The Plan contains a number of development management policies to ensure that waste and minerals development is sustainable, avoids or minimises adverse impacts on the environment and communities and provides benefits where possible. These are:

- Policy DM 1: Sustainable Design
- Policy DM 2: Environmental and Landscape Sites of International, National and Local Importance
- Policy DM 3: Ecological Impact Assessment
- Policy DM 4: Green Belt
- Policy DM 5: Heritage Assets
- Policy DM 6: Historic Environment Assessment
- Policy DM 7: Safeguarding Mineral Resources

- Policy DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management **Facilities**
- Policy DM 9: Prior Extraction of Minerals in Advance of Surface Development
- Policy DM 10: Water Environment
- Policy DM 11: Health and Amenity
- Policy DM 12: Cumulative Impact
- Policy DM 13: Transportation of Minerals and Waste
- Policy DM 14: Public Rights of Way
- Policy DM 15: Safeguarding of Transportation Infrastructure
- Policy DM 16: Information Required in Support of an Application
- Policy DM 17: Planning Obligations
- Policy DM 18: Land Stability
- Policy DM 19: Restoration, Aftercare and After-use
- Policy DM 20: Ancillary Development
- Policy DM 21: Incidental Mineral Extraction
- Policy DM 22: Enforcement

Contribution to Cumulative Effects¹¹

Development management policies will ensure that negative effects associated with minerals and waste development are avoided or mitigated, and the potential for minerals development to contribute to biodiversity objectives is realised.

There will be economic benefits from ensuring a supply of materials for strategically important industries / economic activities.

Support is provided for recycling of aggregates which reduces the need to extract primary aggregates, providing benefits for land use and landscape. There is also a focus on ensuring that the non-recyclable fraction of this inert waste is targeted at quarry restoration projects as a priority.

The MWLP is supportive of efforts to increase the movement of minerals via wharves which should have the effect of encouraging supply of marine dredged aggregates and hence reducing the need for land won aggregates.

Support provided to extraction of minerals for heritage building products will have benefits for heritage and the historic environment

Ensuring strict adherence to the 'proximity principle' will provide transport benefits, and hence also climate change mitigation benefits.

¹¹ Findings from Sustainability Appraisal of Kent Minerals and Waste Local Plan, URS, July 2014

The minerals strategy includes a focus on the safeguarding of wharves and railheads across the County to enable the on-going importation of marine dredged aggregates, crushed rock and other minerals by sea and rail, rather than by road.

Pre-Submission Minerals Sites Plan, Kent County Council, 2018

The draft Plan identifies three sites for extraction of minerals in Kent:

- Chapel Farm
- Moat Farm
- Stonecastle Farm Quarry Extensions

Contribution to Cumulative Effects¹²

Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are insignificant when considered in the context of emissions from the county as a whole.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion or removal of footpaths.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

Two of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

There is the potential for the sites to have limited impacts on landscape and on the historic environment.

The scale of the cumulative impact of the MSP on traffic is not expected to be great given the predicted number of movements and the context of all traffic movements in the county.

Each of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water

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¹² Findings from Sustainability Appraisal of Minerals Sites Plan, Amey, November 2018

quality.

Kent Joint Municipal Waste Management Strategy (KJMWMS) 2012/13 to 2020/21, Kent Resource Partnership

The objectives of the Strategy are to:

- Deliver the best possible outcomes on materials handled by the KRP from household and other appropriate sources
- Deliver the best possible value for money to Kent taxpayers taking account of whole- service costs paid through Council
- Secure the best possible outcomes through effective partnership working among the 13 Kent councils, through the SE7 Project, with government, and across the supply chain

By 2015/16 the KRP will reduce household waste arisings by at least 5% (based on 2010/11 levels); recycle/compost at least 45%; and send no more than 10% to landfill.

By 2020/21 the KRP will reduce household waste arisings by at least 10% (based on 2010/11 levels); recycle/compost at least 50%; and send no more than 5% to landfill. Our ambition is to get as close to zero untreated waste to landfill as possible.

The KRP will work with the government, the SE7 Project, and others to develop and deliver a waste reduction plan including practical measures to help achieve these policies

The KRP will take account of the need for the right quality of recyclates for the right end uses as included with the revised Waste Framework Directive and transposition into UK legislation.

The KRP will continue its high performance in minimising the use of landfill. The KRP will assist householders to maximise the amounts they recycle and re-use, and avoid putting the following items into residual waste bins: paper, cardboard, glass, metals, wood, plastics, textiles, waste electricals, batteries, and food.

Contribution to Cumulative Effects

By reducing the amount of waste generated and increasing recycling and composting, the strategy will encourage reduced greenhouse gas emissions from waste management which will help to reduce the pressures on biodiversity and communities from climate change impacts. It will also promote a more sustainable economy. Minimising landfill will avoid potential landscape and water quality impacts and impacts on communities from new landfill sites.

Kent Joint Municipal Waste Management Strategy Draft Strategy 2018/19 to 2020/21, Kent Resource Partnership, March 2018

The Kent Resource Partnership (KRP) will support the transformation of Kent into a circular economy, where the value of material resources flowing into and through the region are retained, generating employment, skills and training opportunities, and realising wider economic, environmental, health and wellbeing benefits for the local and regional community and beyond.

The KRP is committed to delivering efficiency and quality in oresource management and waste services, with focus on: -

- Maximising the 'value' of resources that we manage from households, in terms of realising the social, environmental and economic opportunities;
- Providing the best possible value for money service to the Kent taxpayer, taking into account whole service costs;
- Realising opportunities to improve services now and in the future through engagement, collaboration and working in partnership with the supply chain; and
- Supporting future thinking through ongoing research and evidence that will facilitate the transition into a circular economy for Kent.

Up until 2020/21, the KRP will achieve a year on year reduction to its Kent-wide residual household waste per household (kg/h/hold) tonnage.

By 2020/21, the KRP will:

- recycle and compost at least 50% of household waste tonnage
- ensure no more than 5% of Kent's municipal waste ends at landfill.
- develop a joint approach to facilitate the procurement of third sector/reuse providers/charities in managing and delivering a reuse service for bulky waste.

The KRP will explore the possibility of implementing recycling on-the-go initiatives, and other similar activities aimed at recovering resources. Additionally the KRP will look to engage and work with the supply chain to deliver recycling on-the-go in keys areas.

The KRP will publish its Materials End Destinations Publication on an annual basis and continue its transparent approach to reflect where all material resources end up.

Contribution to Cumulative Effects

If adopted, the draft Strategy will promote sustainable economic growth by maximizing the resources gained from waste materials and assisting the transition to a circular economy in Kent.

By reducing the amount of waste generated and increasing recycling and composting, the strategy will encourage reduced greenhouse gas emissions from waste management which will help to reduce the pressures on biodiversity and communities from climate change impacts. It will also promote a more sustainable economy. Minimising landfill will avoid potential landscape and water quality impacts and impacts on communities from new landfill sites.

Ashford Local Plan Submission Version, Ashford Borough Council, December 2017

The draft Local Plan contains no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Canterbury District Local Plan, Canterbury City Council, July 2017

The Local Plan notes that East Quay at Whitstable is safeguarded as a mineral transport facility and states that any proposals will have to have regard to policy CSM6 of the KMWLP.

However, there is no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Dartford Core Strategy, Dartford Borough Council, June 2011

The Core Strategy requires development of wharves to be subject to a study demonstrating cargo handling at the wharf is not viable. It notes safeguarded wharves at Johnsons Wharf.

However, it contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Core Strategy, Dover District Council, February 2010

District Council supports the development of a new freight and passenger ferry terminal at Dover Western Docks provided it safeguards the aggregates wharf facility identified in the Kent Minerals Local Plan

However, the Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Gravesham Local Plan Core Strategy, Gravesham Borough Council, September 2014

The Core Strategy contains a strategic objective to, as a minimum, safeguard the capacity of commercial wharves and other sites needed to support the River Thames as a working waterway.

It notes aggregates operations at Northfleet Embankment East Regeneration Area. The Council will seek to ensure, as a minimum, that sufficient minerals capacity is maintained through appropriate alternative provision, so that wider regeneration initiatives do not prejudice the parallel requirements of the Kent

Minerals and Waste Local Plan. Proposals for the Key Site will be required to retain Red Lion Wharf for commercial river based use that is appropriate to context, subject to capacity for the transhipment of minerals being maintained through appropriate alternative provision off-site.

The Core Strategy notes that there are a number of commercial wharves on the riverside at Gravesend and Northfleet, and that the KMWLP proposes that a number of these are safeguarded, protecting them from development which could prejudice their future use for minerals importation. Subject to planning controls being applicable, the safeguarding of wharves is supported by the Council in general terms to enable river freight handling to reduce dependence on road freight transport. However, the Council considers that a more flexible approach is appropriate where wider regeneration initiatives are being sought and it is possible to rationalise assets in ways that, as a minimum, maintain necessary capacity for freight handling and provide equivalent or better facilities. This is the approach followed in Policy CS11 (Transport).

The loss of existing commercial wharves shown on the Policies Map and other land-side supporting infrastructure will not be supported unless a study and supporting evidence shows that they are no longer viable for marine related employment purposes or are incapable of being made so at reasonable cost, and it has been shown that there is no demand for them through an appropriate marketing exercise carried out in accordance with Council guidance, or appropriate alternative provision is available or will be provided as part of the rationalisation of facilities that, as a minimum, maintains capacity and provides equivalent or better facilities.

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or other minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Maidstone Borough Local Plan, Maidstone Borough Council, October 2017

The Local Plan notes safeguarded areas in allocated sites and requires an assessment of viability and practicability of extraction prior to development.

Contribution to Cumulative Effects

None

Core Strategy, Sevenoaks District Council, February 2011

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Shepway Core Strategy, Folkestone and Hythe District Council, September 2013

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or waste or minerals facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

The Swale Borough Local Plan, Swale Borough Council, July 2017

The Isle of Sheppey area strategy requires that, where appropriate, larger scale development proposals bring forward improvements to the A2500 Lower Road.

Completed transport schemes have highlighted a remaining local pinch point at the junction of Barton Hill Drive/Lower Road, Minster, where replacement of the existing traffic signals with a roundabout would relieve local congestion and facilitate better access to the eastern side of Sheppey. Key schemes identified to address the accessibility, connectivity and capacity issues in Swale include provision of a roundabout at Lower Road/ Barton Hill Drive A2500 to facilitate better access to eastern Sheppey.

Land west of Barton Hill Drive, Minster is allocated for some 620 dwellings, together with open space, landscaping and transport improvements.

The Local Plan identifies mineral safeguarding areas on the proposals map. It states that the Council will work with Kent County Council to identify and safeguard mineral reserves and the rail heads and wharves necessary to ensure the transport, import and export of minerals.

In the event that reserves are identified on sites allocated for development by this Local Plan, the Council will ensure that the developer works with the Minerals Planning Authority to ensure the timely working of the site, provided that there is a sustainable and viable outlet for the resource which allows extraction without an unreasonable impact on development coming forward in line with the safeguarding minerals and prior extraction policies contained in the Kent Minerals and Waste Local Plan.

The Local Plan identifies where safeguarded minerals are present on allocated sites and requires investigation of prior extraction.

Contribution to Cumulative Effects

The proposed development west of Barton Hill Drive may increase pressure on the A2500 Lower Road, but planned transport improvements should mitigate the potential adverse effects of the development and assist traffic flow on Lower Road.

Pre-Submission Draft Local Plan to 2031, Thanet District Council, July 2018

The growth of the Port of Ramsgate is supported as a source of employment and as an attractor of inward investment. The draft Local Plan notes that Kent Minerals and Waste Local Plan 2013-2030 proposes to safeguard the port for the importation of minerals into Kent.

Policy on development at Ramsgate Port states that this is supported where it would facilitate its improvement as a port for shipping, increase traffic through the port, and introduce new routes and complementary land based facilities including marine engineering, subject to:

- a demonstrable port-related need for any proposed land based facilities to be located in the area of the port, and a demonstrable lack of suitable alternative inland locations; and
- compatibility with the character and function of Ramsgate waterfront and the Royal Harbour as a commercial leisure facility; and
- an acceptable environmental assessment of the impact of the proposed development upon the harbour, its setting and surrounding property, and the impact of any proposed land reclamation upon nature conservation, conservation of the built environment, the coast and archaeological heritage, together with any proposals to mitigate the impact.

The draft Local Plan contains no policy or text on the approach to sites that contain safeguarded minerals or waste or minerals facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Local Plan Regulation 19 Pre-Submission Publication, Tonbridge and Malling Borough Council, September 2018

Development will be required to comply with the relevant policies in the adopted Kent Minerals and Waste Local Plan and with the relevant policies of any additional minerals and waste development plan documents that are adopted at the time the planning application is determined.

However, there is no policy or text on the approach to sites that contain safeguarded mineral resources or waste or minerals facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.

Core Strategy Development Plan Document, Tunbridge Wells Borough Council, June 2010

The Core Strategy contains no policy or text on the approach to sites that contain safeguarded mineral resources or minerals or waste facilities.

Contribution to Cumulative Effects

Development on sites that contain safeguarded mineral resources or safeguarded minerals or waste facilities will be required to demonstrate that the mineral will not be needlessly sterilised or the facilities have been

fully considered and it is concluded that development would be acceptable. This will have an economic cost for the proposed development of the site which may affect the viability of development and delay its implementation. It may also delay community benefits associated with house construction or economic benefits associated with employment provision.







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Executive Summary

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Minerals Sites Plan (MSP) preparation process. This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation).

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. It identified that the specific sites for minerals developments would be set out in the separate MSP which is the subject of this SA Report. The MSP is a land use plan produced by Kent County Council which identifies and allocates mineral sites within the county for the working and winning of minerals. The main objective of the MSP is to ensure that Kent has enough permitted mineral reserves over the plan period (until 2030) and 7 years beyond to meet plan making requirements. The following sites are proposed for allocation in the MSP:

- M3 Chapel Farm (western part only)
- M10 Moat Farm
- M13 Stonecastle Farm Quarry Extension

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives as set out in Table 1 of the report. The Pre-submission MSP has been appraised against this set of sustainability objectives.

Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case. It will be important for planning applications to fully assess the impacts on biodiversity, to provide mitigation where possible and where this is not possible to provide replacement habitat of equal value. Restoration proposals at two of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion or removal of footpaths. It should be possible for mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts, although cumulative impacts are not likely to be significant.

Minerals sites generate vehicle movements accessing and leaving the sites. The scale of the cumulative impact of the MSP overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county.

Each of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water quality. However, the cumulative impacts from all sites in the Minerals Sites Plan is not expected to be

significant for the county as a whole.

Two of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

Two of the sites lie within the Metropolitan Green Belt, in which case it must be demonstrated that operations will not constitute inappropriate development or constitute very special circumstances. Given that sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.

There is the potential for the sites to have limited impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the significance of impacts is minimised. Adverse impacts on the AONBs are not likely to be significant.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are not significant when considered in the context of emissions from the county as a whole.

Recommendations are made in the report for measures to prevent, reduce and offset the likely significant adverse effects of the sites proposed for allocation in the MSP. These recommendations are for measures that must be addressed in detailed proposals submitted at planning application stage.

In November 2017, Kent County Council identified a longer list of 9 site allocation options following a consultation and gathering of more detailed information on the potential sites. These site options have been appraised as 'reasonable alternatives' for the MSP.

In addition to site alternatives, it was considered that there was potential to consider an alternative to allocating some sites for land-won aggregates in Kent. This alternative is to increase the supply of secondary and recycled aggregates, marine dredged aggregates and land-won aggregates from outside of Kent. This alternative has also been appraised and the results of this are set out in this report.

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1. Non-Technical Summary

1.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Minerals Sites Plan (MSP) preparation process. This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation). SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

1.2. What is the plan seeking to achieve?

The MSP is a land use plan produced by Kent County Council which identifies and allocates mineral sites within the county for the working and winning of minerals. From 11 'Reasonable Alternatives', the following sites are proposed for allocation:

- M3 Chapel Farm
- M10 Moat Farm
- M13 Stonecastle Farm Quarry Extension

The main objective of the MSP is to ensure that Kent has enough permitted mineral reserves over the plan period (until 2030) and 7 years beyond to meet plan making requirements. Site M3 is a soft sand site and M10 and M13 are sharp sand and gravel sites.

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The KMWLP did not allocate specific sites suitable for minerals and waste development except for two strategic sites - one for cement production (and related mineral reserves) at Holborough in the Medway Valley and one for hazardous waste disposal at Norwood Quarry on the Isle of Sheppey). The KMWLP identified that the specific sites for minerals developments would be set out in the separate MSP which is the subject of this SA Report. The selection of sites will be based on the policies of the KMWLP and sites proposed for development will be required to comply with the policies of the KMWLP.

In parallel with the development of the MSP, Kent County Council is also undertaking a Partial Review of the KMWLP. Policies CSW7, CSW8, CSW 12 and CSW 14 of the KMWLP state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls. A review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. The policies will be amended by the Partial Review to reflect this updated understanding. Policies DM7 and DM8 set out criteria to allow development that may affect safeguarded sites to proceed

in certain prescribed circumstances. Policies DM 7 and DM 8 will be amended by the Partial Review to ensure that the safeguarding is not unduly rigid in its application. The Partial Review has been subject to SA and the results of this are set out in a separate SA Report.

1.3. What's the situation now and how would it change without the plan (sustainability 'baseline')?

The following is a summary of the sustainability baseline characteristics in Kent.

Environmental baseline

- Kent is considered to be one the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe.
- Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway UA), the Isle of Thanet, the Stour Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 8.5% of the county. The county contains c.10% of England's ancient woodland.
- The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to builtdevelopment or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- Analysis at the County level has informed the location of 16 Biodiversity Opportunity Areas (BOAs) across Kent covering 40% of the land area (BOAs cover 35% of the South East).
- Since 2008 there has been a reduction in carbon dioxide emissions of 0.8 tonnes per capita. Nonetheless, this figure remains higher than regional and national emission levels.
- In 2010 it is estimated that 1050 early deaths occurred as a result of just PM2.5 air pollution across Kent & Medway [KMAQM, 2015]
- Kent is considered to be the most at risk lead local flood authority in England. Flooding has a significant impact on residents and the economy, with such effects predicted to worsen due to climate change.
- In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption. [EA, 2012]

Social baseline

- Kent had an estimated population of 1,466,500 in mid-2011. By 2021 the population of Kent is projected to increase by 9.4% from 2012. The age group with the greatest projected percentage change in population is 65+ (21.2%).
- In mid-2011, Kent had the largest rural population of any county in the South East (29%) and identified problems of 'rural deprivation', e.g. associated with access to services, facilities and housing affordability.
- In terms of the 'Index of Multiple Deprivation', Kent ranks within England's least deprived third of authorities. However, significant areas within Kent are amongst England's most deprived 20%. Life expectancy is 8.2 years lower for men and 4.5 years lower for women in the most deprived areas of Kent than in the least deprived areas.

- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. About 18.4% of Year 6 children are classified as being obese, lower than the average for England. However, estimated levels of adult obesity are worse than the England average.
- Climate change projections highlight an increase in risk to people from flooding; and hotter and sunnier summers leading to public health risks.

Economic baseline

- In 2011, the Gross Domestic Household Income (GDHI) in Kent was £16,855, 5.1% above the UK average, while the South East region was 12.8% above the UK average.
- 2011 was the first year since 2008 that the 'birth' of enterprises in the Kent exceeded the number of 'deaths'.
- During the period October 2011 to September 2012, the employment rate for residents of Kent was 71.1%, a lower figure than that for the South East (74.6%) and close to that for England (70.7%).
- In Kent, the unemployment rate for October 2011 to September 2012 was 7.4% of the population aged 16 years and over; greater than the rate for the South East (5.8%) and close to the rate for England (7.9%).
- The 'public administration, education and health' sector employs the highest proportion of persons aged 16 to 64 (30.7%). Agriculture and fishing employs the lowest proportion of the population aged 16 to 64 (1.6%). These are also the lowest / highest employers at regional and national levels.

How would the baseline would change without the Minerals Sites Plan?

There is a degree of uncertainty about how the baseline might change without the adoption of the MSP. Mineral sites will still come forward for development and these will be required to comply with the development management policies of the KMWLP. This includes policies on the protection and enhancement of: biodiversity value, landscape, Green Belt, heritage assets, the water environment, health and amenity (including air quality) and transportation. Long term trends in environmental quality are likely to continue.

However, without the MSP there will be less certainty that Kent would be able to provide enough minerals to support the expected future demand for minerals from construction and industry. In such an event, there would be a need to source minerals from elsewhere. This may mean importing minerals from other parts of the country, which will have adverse effects on transport networks and air quality. Alternatively, increased quantities may need to be secured from secondary and recycled aggregates and/or marine dredged aggregates. If sufficient minerals of the right type cannot be found, construction and industrial growth may be checked. This could lead to insufficient homes being provided with adverse effects on people and communities. Minerals in Kent would not provide sufficient material to support economic growth, in which case employment levels could reduce and GDP and household incomes may fall.

Emissions of carbon dioxide may be unchanged without the MSP. Mineral sites will still be developed and emissions of carbon dioxide from mineral operations will continue largely the same as at current levels. However, if imports from other parts of the country are required, this will lead to increased carbon dioxide emissions associated with mineral transport and associated risks to people and communities.

The social baseline is unlikely to be affected without the adoption of the MSP. Population, levels of deprivation and health are unlikely to be significantly different with or without the MSP. Mineral sites will still come forward for development and these must comply with the policies of the KMWLP, including on health and amenity.

1.4. Characteristics of areas likely to be significantly affected

The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by the MSP. In deciding which areas are likely to be significantly affected by the MSP, the SA has made reference to the spatial distribution of the proposed minerals sites to determine whether there are any areas of Kent which contain a particular concentration of minerals sites that could give rise to significant effects. This was not found to be the case.

1.5. Areas of Particular Environmental Importance

There are five European sites designated under European Directives 79/409/EEC and 92/43/EEC and which are located within a 20km radius of the 8 sites which have been considered as 'reasonable alternatives' for the MSP. These are:

- Dungeness SAC;
- Dungeness, Romney Marsh & Rye Bay SPA & Ramsar site;
- Ashdown Forest SAC and SPA;
- North Downs Woodlands SAC and
- Peter's Pit SAC.

The characteristics of these designated sites are described in detail in Section 3.6 of the main report.

1.6. SA Framework and Sustainability Objectives

Various environmental, social and economic issues have been identified through reviewing a wide variety of plans and strategies, collecting baseline information and identifying sustainability issues and problems. These issues have informed the development of the sustainability appraisal framework, which consists of a set of sustainable development policy objectives (sustainability objectives) as set out in Table 1. Following due diligence in terms of the context and baseline conditions, the Framework and Sustainability Objectives for the SA of the MSP has been developed using that produced by URS (2013). The relationship between the 2010 Scoping and 2013 SA Report objectives is presented in Table 1 below, which also expands on the detail of the objectives and the additions made following the 2017 Scoping exercise and review of the NPPF 2018 and the 25 Year Environment Plan.

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– Ensure that development does not lead to increased flood risk on	5	Flood risk	SO1					
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or off site		I I	I					
		 		or off site				

	– Seek to mitigate or reduce flood risk through developments the		
	! 		are able to slow water flow and promote groundwater recharge
6	Land	S08	Make efficient use of land and avoid sensitive locations
	I I	I	– Make best use of previously developed land
	I I	I I	– Avoid locations with sensitive geomorphology
	I I	I I	– Recognise the economic and other benefits of the best and most
	I I	1	versatile agricultural land
	! !		- Prevent inappropriate development in the Green Belt
7	Landscape and	S03	Protect and enhance Kent's countryside and historic environment
	the historic	I I	- Protect the integrity of the AONBs and other particularly valued or
	environment	1	sensitive
	I I	I I	landscapes
	I I	1	- Take account of the constraints, opportunities and priorities
	! !		demonstrated through landscape characterisation assessments and
	I		other studies at the landscape scale.
	I	i I	- Protect important heritage assets and their settings, as well as
	I I	I I	take account of the value of the character of the wider historic
	I I	I I	environment
8	Transport	SO6	Reduce and minimise unsustainable transport patterns and facilitate
	! !		the transport of minerals and waste by the most sustainable modes
	I		possible
	I	i I	– Minimise minerals and waste transport movements and journey
	I I	I I	lengths; and encourage transport by rail and water.
	I I	I I	– Ensure that minerals and waste transport does not impact on
	I I		sensitive locations, including locations already experiencing
	 		congestion and locations where planned growth or regeneration is
	! 		reliant on good transport networks.
9	Water	SO4	Maintain and improve the water quality of the Kent's rivers, ground
	I I	I I	waters and coasts, and achieve sustainable water resources
	I I	I I	management
	I I	1	– Ensure that minerals and waste development seeks to promote
	! !		the conservation of water resources wherever possible particular
	I		reference to abstraction.
	I I	1	– Avoid pollution of ground or surface waters, particularly in areas
		. L	identified as being at risk or sensitive
Scope (2013	ed out of URS	SO10 [waste]	

Table 1 SA Framework

1.7. Likely Significant Effects of the Pre-submission MSP

The sites that are proposed for allocation are M3 Chapel Farm (western part only), M10 Moat Farm and M13 Stonecastle Farm Quarry Extension. The following table summarises the conclusions about the impact of the

MSP overall with these three sites proposed for allocation.

			9	Sustainal	oility O	bjectiv	е		
Site	1 Biodiversity	2 Climate change	3 Community and	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the	8 Transport	9 Water
M3 Chapel Farm	-	-	-	++/-	0	-	-/?	?	-
M10 Moat Farm	?/-	0	-	++/-	?	?	-/?	0	-
M13 Stonecastle Farm Quarry	-/+	0	0	++/-	?	0/?	?	0	-/?
Overall impacts	-	-	-	++/-	?	?	-/?	?	-/?

Table 2: Summary of Findings of SA of MSP Overall

Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case. It will be important for planning applications to fully assess the impacts on biodiversity, to provide mitigation where possible and where this is not possible to provide replacement habitat of equal value. Restoration proposals at two of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are insignificant when considered in the context of emissions from the county as a whole.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion or removal of footpaths. It should be possible for mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts, although cumulative impacts are not likely to be significant.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

Two of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

One of the minerals sites contains soil which is classed as the best and most versatile agricultural land,

although restoration to agricultural land is proposed and therefore the impact of the MSP on soil quality is not likely to be significant. Two of the sites lie within the Metropolitan Green Belt, in which case it must be demonstrated that operations will not constitute inappropriate development or constitute very special circumstances. Given that sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.

There is the potential for the sites to have limited impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the significance of impacts is minimised. Adverse impacts on the AONBs are not likely to be significant.

Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and it is estimated that these will range between 4 movements per hour to 8 movements per hour depending on the site. In addition, staff vehicles will access the sites, around an estimated 10 movements per day. For sites M10 and M13, operations are planned to run sequentially with existing extraction in the locality so that the impacts from vehicles are likely to be no greater than existing impacts. The scale of the cumulative impact of the MSP overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. It is unlikely that the Minerals Sites Plan will support the use of sustainable modes of transport for minerals, although the KMWLP safeguards railheads and wharves to support rail and water transport of minerals.

Each of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water quality. Restoration to wetland could affect local hydrology. However, the cumulative impacts from all sites in the Minerals Sites Plan is not expected to be significant for the county as a whole.

1.8. Recommendations for Mitigating Adverse Effects

Recommendations are made in the detailed appraisal of sites in Appendix D for measures to prevent, reduce and offset the likely significant adverse effects of the sites proposed for allocation in the MSP. These recommendations are for measures that must be addressed in detailed proposals submitted at planning application stage. These measures address impacts on:

- Biodiversity habitats and species
- Amenity, including on public access, noise, dust, vibration, visual impacts and light
- Air quality
- Flood risk
- Green Belt
- Landscape
- Designated and undesignated heritage assets
- Road network
- Water quality and hydrology

1.9. Reasons for Selecting Alternatives Dealt With

A Refresh Call for Sites took place from December 2016 to March 2017, resulting in 38 sites being submitted to KCC for selection assessment, accompanied by a wide range of detailed technical and operational impact data from applicants. For a site to be considered to be a Mineral Site Option it had to:

- Align with the objectives of the adopted KMWLP and scope of the Sites Plan: The KWMLP sets out the minerals supply needs and waste management capacity provision over the period 2013-2030 and the Sites Plan needs to identify sufficient sites to contribute to this requirement.
- Be justified: The site should represent an appropriate option based on a desktop assessment of the opportunities and constraints associated with its location.
- Be deliverable: Development of the site should not result in severe adverse effects that would affect
 its deliverability, and its development should also be supported by the landowner

A number of sites were ruled out of consideration as reasonable alternatives and therefore were not subject to KCC's Regulation 18 'Minerals Sites Plan Options Consultation'.

Kent County Council published a short list of options¹ for minerals sites being considered as allocations in the MSP. These sites were subject to an initial screening as stage 2 of the KCC Site Selection Methodology, known as the 'RAG' assessment. The following sites were published as options for consultation with a summary of the results of the Stage 2 RAG assessment:

- site M2 Lydd Quarry Extensions
- site M3 Chapel Farm
- site M7 Central Road
- site M8 West Malling Sandpit
- site M9 The Postern
- site M10 Moat Farm
- site M11 Joyce Green Quarry
- site M12 Postern Meadows
- site M13 Stonecastle Farm Quarry Extension

In November 2017, Kent County Council identified site allocation options following a review of the information obtained through the above consultation on options and gathering of more detailed information

¹ Mineral Sites Plan Options Consultation, Kent County Council, September 2017

on the sites. M9 was no longer being progressed because it was withdrawn by the promoter. Therefore the following options remained as 'reasonable alternatives' to be considered for site allocations:

- site M2 Lydd Quarry Extensions
- site M3 Chapel Farm
- site M7 Central Road
- site M8 West Malling Sandpit
- site M10 Moat Farm
- site M11 Joyce Green Quarry
- site M12 Postern Meadows
- site M13 Stonecastle Farm Quarry Extension

These reasonable alternatives have been subject to SA in this report.

Following detailed technical assessment, review of further submissions to Kent County Council in relation to the sites and the findings of this SA, several of the sites listed as reasonable alternatives have been ruled out as proposed allocations in the Pre-submission MSP. Three sites are proposed for allocation in the Pre-submission MSP. These sites are judged to have acceptable or mitigable impacts following detailed technical assessment, consultation and review of the findings of the SA:

M3 Chapel Farm

The western part of the site is suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage. The eastern part of the site has been withdrawn by the promoter due to likely unacceptable impact on heritage asset.

M10 Moat Farm

Suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage.

• M13 Stonecastle Farm Quarry Extension

Suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage.

In addition to site alternatives, it was considered that there was potential to consider an alternative to allocating some or any sites for land-won aggregates in Kent.

With its coastal location, Kent fulfils an important role in the importation of minerals including a range of construction aggregates from mainland Europe, as well as marine dredged aggregates (MDA) and imported recycled and secondary materials. Kent benefits from a number of aggregate wharves, into which significant quantities of MDA and crushed rock are landed. Land-won sharp sand and gravel is also imported by rail and road from areas beyond Kent. Assurances regarding the security of these minerals imports during the Plan period were obtained in developing the KMWLP.

In addition to the land-won maintenance of landbanks to support a steady future supply of aggregate in Kent, the KMWLP contains strategic objectives and policies to

- Promote and encourage the use of recycled and secondary aggregates in place of land-won minerals.
- Safeguard existing, planned and potential sites for mineral infrastructure including wharves and rail
 depots across Kent to enable the on-going transportation of marine dredged aggregates, crushed rock
 and other minerals as well as other production facilities.

It is therefore reasonable to assume that an increased supply of secondary and recycled aggregates and MDA is an alternative to the mining of some land-won sharp sand and gravels. It is also reasonable to assume that some land-won aggregates could be imported into Kent from sites outside of Kent. This has therefore been appraised as an alternative to the allocation of sites for sharp sand and gravel. The results of this appraisal are set out in detail in Appendix E and summarised in Section 6.3.

1.10. Methodology

The SA has appraised each of the sites considered as reasonable alternatives, as well as the alternative to allocating some or any land-won aggregate sites in Kent against the appraisal framework set out in Table 1. The SA has also appraised the Kent site selection methodology against this framework. The appraisal was done by assessing each site, other alternative and element of methodology against the appraisal objectives in turn and making a largely qualitative assessment, with reference also to the baseline data from the Scoping Report.

In reporting the results of the appraisal, the following symbols have been used to indicate the broad nature of the predicted effect:

	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	
Significant adverse effect	-
Uncertain effect	?

Further details on the methodology, including assumptions made, are given in Section 6 of the main report. Information on the difficulties encountered is provided in Section 4 of the main report. These relate to the lack of available data in some instances, and uncertainties about detailed matters of implementation.

1.11. Monitoring Recommendations

The sustainability appraisal has developed a set of recommendations for monitoring the predicted and unforeseen impacts of implementation of the Pre-submission MSP as proposed. These are set out as a series of indicators related to the sustainability appraisal framework based on the likely and possible impacts of the Pre-submission MSP. The recommended indicators should be incorporated into the Annual Monitoring Report for the Local Plan and are set out in Section 7.

2. Introduction

2.1. Background

Amey is commissioned to undertake Sustainability Appraisal (SA) in support of the Kent Minerals and Waste Local Plan (KMWLP) Minerals Sites Plan (MSP) preparation process. This report presents the interim outcomes of this process up to Regulation 19 stage (Pre-submission consultation). SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising positives.

2.2. The SA Process

It is a legal requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.

The Regulations require that a report - which for the purposes of SA is known as the 'SA Report' – is published for consultation alongside the Preferred Options Consultation document of the Kent Minerals Sites Plan and then taken into account, alongside consultation responses, when finalising the plan. Essentially, the SA Report must 'identify, describe and evaluate' the likely significant effects of implementing 'the plan, and reasonable alternatives'.

In-line with regulatory requirements, Sustainability Appraisal has already been undertaken throughout the drafting and adoption of Kent's MWLP (most recently: URS, 2013 and Addenda). Kent are currently developing their Minerals Sites Plan: The MSP must be in conformity with the overarching MWLP policies, and will identify sites which meet with the MWLP's requirements and aspirations. The selection of minerals sites has been made from those sites promoted in the call for sites, KCC having employed their own Site Selection Methodology (KCC, 2016) based on best practice, in order to determine which of those submitted for consideration are 'Reasonable Alternatives'. This SA Report has informed the selection of the 'Preferred Options' sites to go forward to the Pre-Submission Draft of the Kent Mineral Sites Plan and the Regulation 19 consultation.

SA has been undertaken of the Site Selection Methodology and Reasonable Alternatives to inform Regulation 19 Pre-submission consultation. The SA of the Kent Minerals Sites Plan will assess both the KCC (2016) methodology, and the sites deemed to be 'Reasonable Alternatives'. A scoping exercise has been undertaken, leading to the production in September 2017 of a Scoping Report which explains the rationale behind the SA Framework selected for this Site Selection Methodology and Reasonable Alternatives SA. This SA Report has been produced in order to address the statutory appraisal questions as detailed in Table 3, to ensure that the sites proposed as 'Preferred Options' have been assessed, any matters of significance noted and mitigation proposed if appropriate.

APPRAISAL QUESTION	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE
	(The report must include)
1) What is the plan seeking to achieve?	"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" (Annex I(a))
2) What's the sustainability context?	"an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes" (Annex ((a)) "the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
3) What's the situation <u>now</u> ?	"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex I(b)) "the environmental characteristics of areas likely to be significantly affected" (Annex I(c))
4) What would the situation be without the plan?	"the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme" (Annex I(b))
5) What are the key issues that should be a particular focus of the appraisal?	"any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC [Special Protection Areas under the Birds Directive] and 92/43/EEC" (Annex Idd)) (Note impacts on European sites will be specifically addressed through Habitats Regulations Assessment)
6) How has the plan developed up to this point (including the influence of SA)?	"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex (h))
	"the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation" (Annex I(e))
7) How has the appraisal at this current stage been undertaken?	"an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information" (Annex I(h))
8) What are the appraisal findings / recommendations at this current stage?	"the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors" (Annex I(f)) "the measures envisaged to prevent, reduce and as fully as possible offset any
	significant adverse effects on the environment of implementing the plan or programme" (Annex I(g))
9) How might we monitor the plan's impacts?	"a description of the measures envisaged concerning monitoring" (Annex $I(i))$

Table 3Questions that must be answered (sequentially) within the SA Report

2.3. Compliance with the SEA Directive and Regulations

The MSP is subject to the requirements of the European Union's Directive on the Environmental Assessment of Certain Plans & Programmes 2001/42/EC (the SEA Directive) and the domestic legislation through which the Directive has been transposed into law in England and Wales (the Environmental Assessment of Plans & Programmes Regulations 2004 – Statutory Instrument 2004 No. 1633).

The SA of the MSP was designed and undertaken so as to meet the legal requirements for the environmental assessment of plans. Throughout the report the term 'Sustainability Appraisal' should be interpreted as encompassing the SA process as required under the Planning & Compulsory Purchase Act 2004 and the Strategic Environmental Assessment process as required under the European Directive and domestic Regulations on the environmental assessment of plans and programmes.

The following table indicates the components of the SA Report that make up the Environmental Report, as required by domestic and European law on the environmental assessment of plans.

Requirements for Environmental Report	Component of
	SA Report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 3.1
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 3.3
c) The environmental characteristics of areas likely to be significantly affected;	Section 3.5
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sections 3.3 and 3.6
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	Section 3.2
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Section 6 and Appendices C to E
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Appendix D
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5

Requirements for Environmental Report	Component of SA Report
i) a description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 7
j) a non-technical summary of the information provided under the above headings	Section 1

Table 4 Requirements of SEA Directive and Compliance of SA Report

3. The Scope of the Sustainability Appraisal

3.1. What is the plan seeking to achieve?

The MSP is a land use plan produced by Kent County Council which identifies and allocates mineral sites within the county for the working and winning of minerals. The following sites are proposed for allocation:

- M3 Chapel Farm
- M10 Moat Farm
- M13 Stonecastle Farm Quarry Extension

The main objective of the MSP is to ensure that Kent has enough permitted mineral reserves over the plan period (until 2030) and 7 years beyond to meet plan making requirements. Sites M3 is a soft sand site and M10 and M13 are sharp sand and gravel sites.

The Kent Minerals and Waste Local Plan (KMWLP) was adopted in July 2016 and sets out the vision and objectives for Kent's minerals supply and waste management capacity from 2013 to 2030. The KMWLP did not allocate specific sites suitable for minerals and waste development except for two strategic sites - one for cement production (and related mineral reserves) at Holborough in the Medway Valley and one for hazardous waste disposal at Norwood Quarry on the Isle of Sheppey). The KMWLP identified that the specific sites for minerals developments would be set out in the separate MSP which is the subject of this SA Report. The selection of sites will be based on the policies of the KMWLP and sites proposed for development will be required to comply with the policies of the KMWLP.

The KMWLP is a high level document planning to 2030 which:

- sets out the vision and strategy for mineral provision and waste management in Kent;
- contains a number of development management policies for evaluating minerals and waste planning applications;
- considers strategic site provision for all minerals and waste management facilities; and identifies two
 areas where key (strategic) mineral and waste development should take place. These have been fully
 assessed previously and therefore are not subject to this SA.

In parallel with the development of the MSP, Kent County Council is also undertaking a Partial Review of the KMWLP. Policies CSW7, CSW8, CSW 12 and CSW 14 of the KMWLP state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls. A review of the future needs for waste management facilities in Kent has recently been undertaken and this has concluded that there is now no need for the development of this additional capacity. The policies will be amended by the Partial Review to reflect this updated understanding. Policies DM7 and DM8 set out criteria to allow development that may affect safeguarded sites to proceed

in certain prescribed circumstances. Policies DM 7 and DM 8 will be amended by the Partial Review to ensure that the safeguarding is not unduly rigid in its application. The Partial Review has been subject to SA and the results of this are set out in a separate SA Report.

The government has published the National Planning Policy Framework (July 2018), which sets out planning policies for achieving sustainable development. Emphasis has been placed on the importance of ensuring that Local Plan policies contribute to achieving sustainable development. The MSP has been prepared in compliance with the National Planning Policy Framework (NPPF).

The current piece of work is to undertake SA of the draft MSP to inform Regulation 19 consultation on the Pre-submission draft of the MSP, which must be in conformity with the overarching KMWLP. Rather than being a strategy document, the MSP identifies sites which meet with the MWLP's aspirations, and which can be demonstrated to meet social, economic and environmental criteria. The MSP and associated SA do not replace the statutory need for Environmental Impact Assessment, nor does it remove the need for applicants to apply for detailed planning permission.

3.2. What's the sustainability context?

URS answered this question in 2013 primarily by reviewing the National Planning Policy Framework (NPPF) and considering the contextual messages established through other plans, policies, strategies and initiatives. Although NPPF (2012) has now been augmented by the publication of various Planning Guidance, the themes of importance largely remain the same. Where a new aspect of context has been identified, this is identified within Table 5 and has been incorporated into the updated Baseline, below. This information was set out in detail in the SA Scoping Report² published in November 2017.

DCLG (2014) Minerals Planning	"Minerals operators should	Check all of these matters
Guidance	look to agree a programme	form part of the
[https://www.gov.uk/guidance/minerals]	of work with the mineral	submissions.
	planning authority which	
	takes into account, as far as	
	is practicable, the potential	
	impacts on the local	
	community and local	
	environment (including	
	wildlife), the proximity to	
	occupied properties, and	
	legitimate operational	
	considerations over the	

² Scoping Report: Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017

	expected duration of operations".	
	Water abstraction is	Added to baseline. Ensure
	additional to issues	water abstraction is included
	presented in NPPF.	in assessment.
	Lots of useful operational	Added to baseline. Ensure
	detail on noise, dust plus	PM2.5 pollution risk is
	flow chart wrt 1km search	included in assessment.
	area and PM2.5 AQO – limit	
	value for PM2.5 came into	
	force 2015.	
BSI (2014) BS 5228-1:2009+A1:2014	Method of predicting and	All relevant for site specific
(Code of practice for Noise control on	mitigating noise at open	assessments.
construction & open sites)	sites.	
BSI (2014) BS 5228-2:2009+A1:2014	Method of predicting and	
(Code of practice for Vibration control	mitigating vibration at open	
on construction & open sites)	sites.	
BSI (2014) BS 4142: 2014	Method of determining	
(Methods for rating and assessing	whether noise from plant	
industrial and commercial sound)	and equipment could give	
	rise to residential	
	complaints.	

Table 5 Additional Aspects of Sustainability Context since 2013

Since the publication of the SA Scoping Report in November 2017, the National Planning Policy Framework (NPPF) has been revised and was published in July 2018³. This is the overarching document guiding planning policy in England and as such is important to review to ensure that the SA appraisal framework is consistent with the policy objectives of the NPPF. In 2018, the Government also published a new 25 Year Environment Plan, "A Green Future"⁴. A review has been undertaken and the main policy objectives of the NPPF and "A Green Future" relevant to the MSP are set out in Appendix A. The key conclusions drawn from this review are that the appraisal framework used to assess the MSP should be amended to ensure that the following policy objectives are adequately covered in the framework:

- Recognise the economic and other benefits of the best and most versatile agricultural land;
- Prevent inappropriate development in the Green Belt;

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³ National Planning Policy Framework, Ministry of Housing Communities and Local Government, July 2018

⁴ A Green Future: A 25 Year Plan to Improve the Environment, HM Government, 2018

- Protect and enhance public rights of way and access;
- Protect local green space.

3.3. What's the situation now and how would it change without the plan (sustainability 'baseline')?

The following is a summary of the sustainability baseline characteristics described by URS (2013), to set the scene on this further piece of work. Additional items identified during context review are also presented.

Environmental baseline

- Kent is considered to be one the UK's most wildlife-rich counties. This is a result of its varied geology, long coastline, landscape history and southerly location / proximity to mainland Europe.
- Natura 2000 habitat is concentrated around the coast, particularly around the Thames Gateway (much within Medway UA), the Isle of Thanet, the Stour Estuary and Dungeness. Sites of Special Scientific Interest (SSSI) cover 8.5% of the county. The county contains c.10% of England's ancient woodland.
- The Thames Gateway is also acknowledged for its national importance due to 'brownfield' biodiversity.
- The last century has seen major losses and declines of species within Kent. Amongst the most important drivers of biodiversity loss in Kent are: the direct loss of land of value to wildlife to builtdevelopment or intensive farming, which has reduced and fragmented populations; and the effects of climate change.
- Analysis at the County level has informed the location of 16 Biodiversity Opportunity Areas (BOAs) across Kent covering 40% of the land area (BOAs cover 35% of the South East).
- Since 2008 there has been a reduction in carbon dioxide emissions of 0.8 tonnes per capita. Nonetheless, this figure remains higher than regional and national emission levels.
- In 2010 it is estimated that 1050 early deaths occurred as a result of just PM2.5 air pollution across Kent & Medway [KMAQM, 2015]
- Kent is considered to be the most at risk lead local flood authority in England. Flooding has a significant impact on residents and the economy, with such effects predicted to worsen due to climate change.
- In Kent there are many catchments where there is little or no water available for abstraction during dry periods. Pressures are particularly notable in Kent as it is one of the driest parts of England and Wales, coupled with high population density and household water use. Over the next few decades, there will be increasing pressures from the rising population and associated development. Looking further ahead, climate change could have a major impact on the water that will be available for consumption. [EA, 2012]

Social baseline

- Kent had an estimated population of 1,466,500 in mid-2011. By 2021 the population of Kent is projected to increase by 9.4% from 2012. The age group with the greatest projected percentage change in population is 65+ (21.2%).
- In mid-2011, Kent had the largest rural population of any county in the South East (29%) and identified problems of 'rural deprivation', e.g. associated with access to services, facilities and housing affordability.
- In terms of the 'Index of Multiple Deprivation', Kent ranks within England's least deprived third of authorities. However, significant areas within Kent are amongst England's most deprived 20%. Life

expectancy is 8.2 years lower for men and 4.5 years lower for women in the most deprived areas of Kent than in the least deprived areas.

- Early death rates from cancer, heart disease and stroke have fallen and are better than the England average. About 18.4% of Year 6 children are classified as being obese, lower than the average for England. However, estimated levels of adult obesity are worse than the England average.
- Climate change projections highlight an increase in risk to people from flooding; and hotter and sunnier summers leading to public health risks.

Economic baseline

- In 2011, the Gross Domestic Household Income (GDHI) in Kent was £16,855, 5.1% above the UK average, while the South East region was 12.8% above the UK average.
- 2011 was the first year since 2008 that the 'birth' of enterprises in the Kent exceeded the number of 'deaths'.
- During the period October 2011 to September 2012, the employment rate for residents of Kent was 71.1%, a lower figure than that for the South East (74.6%) and close to that for England (70.7%).
- In Kent, the unemployment rate for October 2011 to September 2012 was 7.4% of the population aged 16 years and over; greater than the rate for the South East (5.8%) and close to the rate for England (7.9%).
- The 'public administration, education and health' sector employs the highest proportion of persons aged 16 to 64 (30.7%). Agriculture and fishing employs the lowest proportion of the population aged 16 to 64 (1.6%). These are also the lowest / highest employers at regional and national levels.

How would the baseline would change without the Minerals Sites Plan?

There is a degree of uncertainty about how the baseline might change without the adoption of the MSP. Mineral sites will still come forward for development and these will be required to comply with the development management policies of the KMWLP. This includes policies on the protection and enhancement of: biodiversity value, landscape, Green Belt, heritage assets, the water environment, health and amenity (including air quality) and transportation. Long term trends in environmental quality are likely to continue.

However, without the MSP there will be less certainty that Kent would be able to provide enough minerals to support the expected future demand for minerals from construction and industry. In such an event, there would be a need to source minerals from elsewhere. This may mean importing minerals from other parts of the country, which will have adverse effects on transport networks and air quality. Alternatively, increased quantities may need to be secured from secondary and recycled aggregates and/or marine dredged aggregates. If sufficient minerals of the right type cannot be found, construction and industrial growth may be checked. This could lead to insufficient homes being provided with adverse effects on people and communities. Minerals in Kent would not provide sufficient material to support economic growth, in which case employment levels could reduce and GDP and household incomes may fall.

Emissions of carbon dioxide may be unchanged without the MSP. Mineral sites will still be developed and emissions of carbon dioxide from mineral operations will continue largely the same as at current levels.

However, if imports from other parts of the country are required, this will lead to increased carbon dioxide emissions associated with mineral transport and associated risks to people and communities.

The social baseline is unlikely to be affected without the adoption of the MSP. Population, levels of deprivation and health are unlikely to be significantly different with or without the MSP. Mineral sites will still come forward for development and these must comply with the policies of the KMWLP, including on health and amenity.

3.4. What are the key sustainability issues?

Following review of both context and baseline, the SA Scoping Report set out the key sustainability issues in Kent as follows. Findings of significance from the SA of Kent's MWLP are also presented (see boxes) (both URS, 2013):

Biodiversity

- Ambitious BAP targets have been set, including for habitat creation and for reducing fragmentation
 and improving connectivity. Landscape scale projects are underway with biodiversity conservation and
 access to biodiversity as central components.
- It is possible to increase the connectivity between important habitat patches by incorporating habitat creation as part of new development. There is a particular need to maximise the biodiversity benefits associated with restoration of minerals sites.
- Biodiversity benefits relate to the minerals development management strategy, which is set to ensure that negative effects associated with minerals extraction are avoided or mitigated, and the potential for minerals development to contribute to biodiversity objectives is realised.

Climate change

- There is the potential to promote energy from waste as well as other technologies that increase the carbon efficiency of minerals and waste operations.
- Transport is a significant contributor to greenhouse gas emissions that should be addressed through the plan.

Community and well-being

- Clear spatial variation across Kent exists in terms of income, employment and health deprivation.
- Rural deprivation is also a recognised problem, for example for the Isle of Sheppey and the Romney Marsh area.
- Deprivation is focused amongst particular socio-economic groups, for example Gypsies and travellers.
- Community impacts associated with the proximity of quarries and also lorry movements is an issue of strategic importance.
- Traffic on the motorway and A-road network is the cause of the majority of designated Air Quality Management Areas (AQMAs)
- Future development at existing population centres is likely to put further pressure on the road network, and lead to new and worsened occurrences of poor air quality.
- There remain instances where point source air pollution is a strategic issue.

Sustainable economic growth

- There are ambitious plans for economic growth and regeneration, for example in East Kent and the Kent Thames Gateway.
- There are local disparities in economic activity (including problems of 'rurality')
- Economic benefits relate to the targeted measures that are proposed as part of the minerals strategy; in particular, around ensuring supply of materials for strategically important industries / economic activities.

Flood risk

There is extensive flood risk in Kent, and this situation is set to become worse with climate change.

Land

- There is a need to make best use of previously developed land and avoid the loss of the County's best and most versatile agricultural land. There is also a need to avoid conflict with coastal geomorphology
- 'Land' and 'landscape' benefits relate to the support that is provided for Construction and Demolition (CD) recycling (i.e. aggregate recycling), which reduces the need to extract primary aggregates. There is also a focus on ensuring that the non-recyclable fraction of this inert waste is targeted at quarry restoration projects as a priority. In addition, the MWLP is supportive of efforts to increase the movement of minerals via wharves which should have the effect of encouraging supply of marine dredged aggregates and hence reducing the need for land won aggregates.

Landscape and the historic environment

- There is a need to protect the integrity of the most valued and sensitive landscapes as well as to avoid damage to the landscape character more widely (signs of change inconsistent with countryside character have been identified in several areas).
- Along with a loss of the distinctiveness of the landscape character there has been a noticeable decrease in the tranquillity of landscapes and landscapes that are genuinely 'wild and remote'.
- Specific landscape impacts can be associated with minerals and waste development. Appropriate restoration should be sought to mitigate effects.
- There is a need to take account of designated heritage assets and their settings as well as undesignated assets and wider historic character
- Heritage / historic environment benefits (which are relatively small magnitude and hence of unclear significance) relate to the support that is provided to extraction of minerals for heritage building products with a view to maintaining a diverse supply.
- There remains ongoing debate about the potential for impacts to the AONB, e.g. from silica sand extraction, but the stringency of policy has been strengthened and so effects are now unlikely. There is also some uncertainty around the landscape / biodiversity implications of making provision for both soft sand and sharp sand / gravel landbanks.

Transport

- Much of the primary road network operates at, or above, capacity and there is a shortage of freight paths on the rail network.
- There is a need to adhere to the proximity principle wherever possible.
- There is a need to increase the amount of waste and, in particular, minerals transported by rail or inland waterway.

- Plans are in place to improve the transport infrastructure within and to the Thames Gateway, East Kent and Ashford. The Kent MWDF should recognise and support the aims of regional hubs.
- 'Transport' (and hence also climate change mitigation) benefits relate to the fact that the waste strategy is geared towards ensuring strict adherence to the 'proximity principle', i.e. a situation whereby waste is managed close to the source of production. It is also the case that the minerals strategy includes a focus on the safeguarding of wharves and railheads across the County to enable the on-going importation of marine dredged aggregates, crushed rock and other minerals by sea and rail, rather than by road. No significant negative effects / trade-offs are identified and no recommendations remain outstanding at this current stage.

Water

- Water scarcity is set to become a greater problem in coming as a result of population growth, climate change and the need to comply with the requirements of the Water Framework Directive.
- Groundwater pollution from a range of sources is evident across much of Kent.

3.5. Characteristics of areas likely to be significantly affected

The SEA Directive requires that the appraisal describes the characteristics of areas likely to be significantly affected by the MSP. In deciding which areas are likely to be significantly affected by the MSP, the SA has made reference to the spatial distribution of the proposed minerals sites to determine whether there are any areas of Kent which contain a particular concentration of minerals sites that could give rise to significant effects.

There are two proposed mineral sites in one locality to the east of Tonbridge, on the border of Tonbridge and Malling Borough and Tunbridge Wells Borough. These are sites M10 and M13. There is also an existing site with permission in the same area (Stonecastle Farm Quarry). It could be considered that the locality might be significantly affected by two allocated sites in that area in addition to the already permitted site. However, it is proposed that sites M10 and M13 are worked sequentially with the permitted site so that the extraction rate and HGV movements are no greater than with the existing permission.

More detailed assessment of the impacts arising from each of the sites and cumulatively are provided in Section 6.2 and Appendix D.

3.6. Areas of Particular Environmental Importance

There are five European sites designated under European Directives 79/409/EEC and 92/43/EEC and which are located within a 20km radius of the 8 sites which have been considered as 'reasonable alternatives' for the MSP. These are:

- Dungeness SAC;
- Dungeness, Romney Marsh & Rye Bay SPA & Ramsar site;
- Ashdown Forest SAC and SPA;
- North Downs Woodlands SAC and

Peter's Pit SAC.

Dungeness SAC

Dungeness is the UK's largest shingle structure and represents the habitat type on the south-east coast of England. The total area of exposed shingle covers some 1,600ha, though the extent of the buried shingle ridges is much greater. Despite considerable disturbance and destruction of the surface shingle, the site retains very large areas of intact parallel ridges with characteristic zonation of vegetation. It still has the most diverse and most extensive examples of stable vegetated shingle in Europe, including the best representation of scrub on shingle. A feature of the site, thought to be unique in the UK, is the small depressions formed within the shingle structure, which support fen and open-water communities. It contains a large number of waterbodies within its 2,000ha. This extensive site hosts a large and viable great crested newt population in a range of natural and anthropogenic habitats. These include natural pools and those resulting from gravel extraction and other activities. Terrestrial habitat of importance for feeding and shelter is provided by a range of open shingle vegetation with scrub in the vicinity of some of the waterbodies.

Dungeness, Romney Marsh and Rye Bay SPA and Ramsar.

The SPA and Ramsar site is located on the south coast of England between Hythe in Kent crossing the county border of East Sussex to Norman's Bay. This is a large area with a diverse coastal and marine landscape comprising a number of habitats, which appear to be unrelated to each other. However, all of them persist because coastal processes have formed and continue to shape a barrier of extensive coastal shingle beaches and sand dunes across an area of intertidal mud and sand flats. The site includes the largest and most diverse area of shingle beach in Britain, with low-lying hollows in the shingle providing nationally important saline lagoons, natural freshwater pits and basin fens. Rivers draining the Weald to the north were diverted by the barrier beaches, creating a sheltered saltmarsh and mudflat environment, which was gradually infilled by sedimentation, and then reclaimed on a piecemeal basis by man. This area is fringed by important intertidal habitats, and contains relict areas of saltmarsh, extensive grazing marshes and reedbeds.

The site also includes a diverse range of broadscale habitats within the marine environment which support a variety of prey species for the foraging seabirds.

Ashdown Forest SAC and SPA

Ashdown Forest is located in the High Weald of East Sussex in south-east England, where valley mires, heath and damp woodland have developed on soils derived from Hastings Sands (Lower Cretaceous). Once a royal hunting forest, reduced grazing has resulted in the accelerated development of woodland and encroachment of bracken over former heath. Nevertheless, some fine examples of heathland habitats remain, with humid or wet heath predominating. Where drier heaths occur they are dominated by heather in association with Gorse and Dwarf Gorse. Streamsides and mires add further variety, with characteristic

plants. The woodlands are also varied, with Birch typically establishing first over heath, followed by Oak, Willow and Pine in places, eventually forming dense and shaded areas with sparse ground flora. Breeding birds of heath, scrub and woodland are associated with the varied mosaic of their respective habitats, distributed over the higher slopes and valleys of the High Weald.

Together with the nearby Wealden Heaths SPA and Thames Basin Heath SPA, Ashdown Forest forms part of a complex of heathlands in southern England that support breeding bird populations of European importance.

North Downs Woodland SAC

This site consists of mature beech forests and yew woods on steep slopes. The stands lie within a mosaic of scrub, other woodland types and areas of unimproved grassland on thin chalk soils. The beech and yew woodland is on thin chalk soils and where the ground flora is not shaded dog's mercury predominates. Associated with it is stinking iris and several very scarce species such as lady orchid and stinking hellebore. The chalk grassland, on warm south-facing slopes, is dominated by upright brome and sheep's-fescue but supports many other plants which are characteristic of unimproved downland, including the nationally rare ground pine.

Peters Pit SAC

Peter's Pit is an old chalk quarry with adjoining soil-stripped fields on the North Downs, with scattered ponds situated amongst grassland, scrub and woodland. The ponds have widely fluctuating water levels and support large breeding populations of great crested newt. The site has an undulating terrain in which many rain fed ponds, of various sizes, have developed. Those which dry up early in the season are of less interest, but five ponds are sufficiently large to support very substantial populations of amphibians, particularly the great crested newt. The value of the site for newts is enhanced by the presence, around the edges and between the ponds, of areas of scrub with loose rock which serve as day and winter refuges. Aquatic vegetation provides shelter in the pond environment.

Habitats Regulations Assessment

Kent County Council have commissioned Amey to undertake a Habitats Regulations Assessment (HRA) of the MSP. The HRA investigates the potential impact of the reasonable alternatives strategic site allocations proposed by the MSP on Natura 2000 sites in the context of the Conservation of Habitats and Species Regulations 2010 (as amended) ('the Habitats Regulations'), which transpose the European Habitats Directive 1992 and Wild Birds Directive 2009 ('the Directives') into English law and hereafter referred to as the 'Habitats Regulations'.

As part of the HRA, a screening exercise has been undertaken to determine which if any of the proposed sites is likely to have a significant effect on any Natura 2000 site. Where a site is deemed not likely to have a significant effect, that site can be screened out from further assessment. Where a site is likely to have a

significant effect, that site must be subject to a further detailed assessment known as Appropriate Assessment.

The HRA screening exercise has determined that site M2 Lydd Quarry Extensions is required to be subject to an Appropriate Assessment. Potential effects could include the disturbance of birds within the SPA/Ramsar and direct loss of habitat if the open fields are used by significant numbers of birds within the SPA/Ramsar. Other potential impacts may include water quality and flow impacts and air quality issues from the workings. However, site M2 Lydd Quarry Extensions is not proposed for allocation in the MSP therefore these potential effects will be avoided.

All other proposed minerals sites have been screened out and do not require Appropriate Assessment.

4. How has the plan developed up to this point?

4.1. Background to the Development of the SA

The process of making the KMWLP commenced in 2009, with SA starting simultaneously and leading to the publication of the MWLP SA Scoping Report (Scott Wilson, 2010). The MWLP SA Scoping Report (Scott Wilson, 2010) included Sustainability Objectives (SO) which had been established during the Scoping process to provide the Framework for the subsequent Sustainability Appraisal. These are presented in Table 6.

Sustai	Sustainability Objective (SO)		
SO1	Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment		
SO2	Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent Biodiversity Action Plan and other strategies		
SO3	Protect and enhance Kent's countryside and historic environment		
SO4	Maintain and improve the water quality of the Kent's rivers, ground waters and coasts, and achieve sustainable water resources management		
SO5			
SO6	Reduce and minimise unsustainable transport patterns and facilitate the transport of minerals and waste by the most sustainable modes possible		
SO7	Plan for the correct waste management facilities, in the right place at the right time		
SO8	Make efficient use of land and avoid sensitive locations		
SO9	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being		
SO10	Support the delivery of housing targets		
SO11	Support economic growth and diversification		

Table 6 Sustainability Objectives established during SA Scoping (Scott Wilson, 2010)

In 2011, these SOs were used to appraise the options which were at the time presented for Minerals and Waste Sites. This was undertaken on a site-by-site basis (Atkins, 2011). In 2012 a similar process was used to assess the Preferred Options (URS, 2012). By 2014 these SOs had been further developed, and the Consultation Draft of the SA Report (URS, 2013) presented the following Assessment Framework (Tables 7 & 8):

1	Biodiversity
2	Climate change
3	Community and well-being
4	Sustainable economic growth
5	Flood risk
6	Land
7	Landscape and the historic environment
8	Transport
9	Water

Table 7 Sustainability Assessment Framework used in SA Report (Consultation Draft) (URS, 2013)

The KMWLP was adopted in 2016 having been through full Sustainability Appraisal culminating in the SA Report and Addenda (URS, 2013; URS, 2015; AECOM, 2015a and 2015b) and the SA Adoption Statement (AECOM, 2016). Kent County Council (KCC) are now proceeding with their Minerals Sites Plan preparation process. Kent's Site Selection Methodology was published in June 2016.

4.2. The Development of the MSP

A Refresh Call for Sites took place from December 2016 to March 2017, resulting in 38 sites being submitted to KCC for selection assessment, accompanied by a wide range of detailed technical and operational impact data from applicants. For a site to be considered to be a Mineral Site Option it had to:

- Align with the objectives of the adopted KMWLP and scope of the Sites Plan: The KWMLP sets out the minerals supply needs and waste management capacity provision over the period 2013-2030 and the Sites Plan needs to identify sufficient sites to contribute to this requirement.
- Be justified: The site should represent an appropriate option based on a desktop assessment of the opportunities and constraints associated with its location.
- Be deliverable: Development of the site should not result in severe adverse effects that would affect
 its deliverability, and its development should also be supported by the landowner

A number of sites were ruled out of consideration as reasonable alternatives and therefore were not subject to KCC's Regulation 18 'Minerals Sites Plan Options Consultation'. These are listed below with the reasons why they are not being considered as reasonable alternatives.

Paradise Farm

Majority of nominated site has recently been granted planning permission for brickearth extraction and the remaining areas would not be viable.

The promoted site has and was the subject of a planning application in 2016 (ref. SW/0277/2016 for 0.885mt of Brickearth to be extracted over 19 years). This was permitted (January 2017) with deletion of two working phases that were adjacent to Newington (phases 16 and 17) and a minor area to the westerly quadrant of the site. This reduced the permitted reserve to 0.75mt to be extracted over 18 years. The un-permitted areas are nominated for allocation in the Minerals Sites Plan. The total reserve in Kent of Brickearth are 0.75mt at Paradise Farm, 0.15 mt at Orchard Farm, an estimated 0.08mt at Hempstead House and Jeffries, Claxfield Road that has an estimated reserve of 0.095mt. Overall the Kent Brickearth reserve is some 1.075mt. Those reserves under the control of the promoter amount to 0.995mt of this and would provide for approximately 23-24 years, almost for the required period of 25 years. The adopted Plan requires sites to be identified for the supply of Brickearth to have reserves of at least 25 years to support the level of actual and proposed

investment of existing plant and equipment. Furthermore, the Brickearth resources that are still being promoted represent areas that are considered too small to be sites in their own right and may be unacceptable for material planning considerations.

Norwood Quarry (Engineering Clay)

This site is identified in the Minerals Sites Plan though this site is an allocation in the adopted KMWLP. Further supply of clay for engineering purposes has been promoted through the Call for Sites exercise, as an extension to this site. The site promoter wishes to extract 1 million cubic metres of London Clay (at a rate of 50,000 cubic metres per annum) in three phases (1-3). Phase 3 and part of Phase 2 is currently the identified in the KMWLP as the strategic allocation for engineering clay extraction to meet needs for the clay and to create void space for the disposal of residues from EfW processes in Kent. Thus this strategic allocation currently adopted underpins the waste strategy needs of the KMWLP. The promoted site extension has a Phase 1 and the majority of a Phase 2. These areas, together with the adopted strategic allocation, would release significantly more engineering clay material than current need suggests is required. The strategic allocation site is identified as an adequate clay reserve up to 2030 in the adopted KMWLP. The NPPF does not require specific landbanks to be maintained and no justification is forthcoming by the site promoter as to why a significant quantity of further London Clay reserves (in the region of some 1 million cubic metres or 1.826 million tonnes) is justified at this time.

Richborough Road

A site providing this type of mineral is not required for allocation.

Wrotham Quarry Extension (Silica Sand)

A site providing this type of mineral is not required for allocation.

Silica sand is a mineral that has national importance due to its limited distribution and its specialist application in industrial processes such as glass manufacture and as a foundry sand amongst others. In Kent the deposit is found in the Folkestone Formation as parts of the geological unit with particular purity. The NPPF states: *Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:*

providing a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant and the maintenance and improvement of existing plant and equipment, as follows:

- at least 10 years for individual silica sand sites;

- at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required.

The adopted KMWLP states that the MPA will seek to permit sites to meet the above requirements and that proposals will be considered on their merits having regard to the policies of the Development Plan as a whole, with consideration of the technical matters and the husbanding of the material of high-grade (pure) deposits for industrial end uses. The Plan does not require silica sand sites to be allocated in the Mineral Sites plan and none have been promoted.

Collarmakers Quarry

Geology includes part the complex Lambeth Group of sands, clays and gravels. The formation has been quarried in the past (Upnor Quarry in Medway where the outcropped is a fine to medium grained clean sand to sandy clay that can be well graded, rounded flint gravel is also present). The promoted site reserve is only estimated (no bore hole data has been supplied) nor is there any supporting technical evidence to demonstrate that the resource in this location is capable of yielding a building sand aggregate.

Wey Street Quarry

Geology includes part of the complex Lambeth Group of sands, clays and gravels. The formation has been quarried in the past (Upnor Quarry in Medway where the outcropped is a fine to medium grained clean sand to sandy clay that can be well graded, rounded flint gravel is also present). The promoted site reserve is only estimated (no bore hole data has been supplied) nor is there any supporting technical evidence to demonstrate that the resource in this location is capable of yielding a sand and gravel aggregate.

Hegdale Quarry

The nominated site is an extension to an existing quarry of the same name in the Kent Downs Area of Outstanding Natural Beauty (AONB), a planning application would only be successful if it could be demonstrated that there were exceptional circumstances justifying the extraction of chalk in this sensitive landscape and it was in the public interest. Assessment of the site suggests that exceptional circumstances would not exist and none have been advanced by the site promoter. Moreover the site has an estimated 1.5 cubic million metres of chalk that would yield some 3.75mt of chalk and this reserve alone would last for 58 years at the recorded 2011-14 average sales rate of extraction. The indicated current chalk reserve position in Kent, that is sufficient for the anticipated Plan period, also suggests that there is no need to identify the promoted site in the Minerals Sites Plan at this time. The recorded average per annum sales for the period 2011-14 is 69,955 tonnes. Assuming the same sales per annum for the period 2015-16 (0.14mt in total) the 2014 reserves of 1.50 mt would now be reduced to 1.37mt. Assuming that extraction has remained at a level equivalent to the average of the 2011-14 period (0.07mtpa) the current permitted reserves will be sufficient for 22 years, if sales have been lower, closer to that recorded in 2014 (38,810 tonnes) then the permitted landbank could be sufficient for some 39 years. The Minerals Sites Plan is anticipated to be for the period 2019 to 20-30 a time of 11years.

Therefore there are sufficient permitted reserves of engineering and agricultural chalk in the county at this time for the anticipated plan period.

Richborough Hall

Sites already have benefit of full planning permission for waste treatment activities that give rise to recycled aggregates from the Construction, Demolition and Excavation Waste stream. In this regard the sites are fully operational and contributing to the current supply of recycled aggregates (844,946 tonnes in 2015 or 16.59% of overall supply of aggregates). The sites were promoted as sites that could expand their waste role as waste facilities beyond current activities.

Richborough Park

Sites already have benefit of full planning permission for waste treatment activities that give rise to recycled aggregates from the Construction, Demolition and Excavation Waste stream. In this regard the sites are fully operational and contributing to the current supply of recycled aggregates (844,946 tonnes in 2015 or 16.59% of overall supply of aggregates). The sites were promoted as sites that could expand their waste role as waste facilities beyond current activities.

In Summer 2017 a Scoping exercise was undertaken by Amey, leading to the publication in November 2017 of a Scoping Report⁵ which developed the context and baseline for this MSP SA, and developed the SA Framework and Objectives to be used in the appraisal (presented in Section 4.1).

Alongside publication of the SA Scoping Report, Kent County Council published a short list of options⁶ for minerals sites being considered as allocations in the MSP. These sites were subject to an initial screening as stage 2 of the KCC Site Selection Methodology, known as the 'RAG' assessment. The following sites were published as options for consultation with a summary of the results of the Stage 2 RAG assessment:

- site M2 Lydd Quarry Extensions
- site M3 Chapel Farm
- site M7 Central Road
- site M8 West Malling Sandpit
- site M9 The Postern
- site M10 Moat Farm

⁵ Scoping Report: Sustainability Appraisal of the Kent Minerals Sites Plan-Making Process, Amey, November 2017

⁶ Mineral Sites Plan Options Consultation, Kent County Council, September 2017

- site M11 Joyce Green Quarry
- site M12 Postern Meadows
- site M13 Stonecastle Farm Quarry Extension

Kent County Council identified the preferred site allocation options following a review of the information obtained through the above consultation on options and gathering of more detailed information on the sites. M9 was no longer being progressed because insufficient information has been obtained from the operator to enable a detailed assessment of the site's suitability to be made. Therefore the following options remained as 'reasonable alternatives' to be considered for site allocations:

- site M2 Lydd Quarry Extensions
- site M3 Chapel Farm
- site M7 Central Road
- site M8 West Malling Sandpit
- site M10 Moat Farm
- site M11 Joyce Green Quarry
- site M12 Postern Meadows
- site M13 Stonecastle Farm Quarry Extension

These reasonable alternatives have been subject to SA in this report.

Following detailed technical assessment, review of further submissions to Kent County Council in relation to the sites and the findings of this SA, several of the sites listed as reasonable alternatives have been ruled out as proposed allocations in the Pre-submission MSP. These sites and the reason for rejection are as follows:

• M2 Lydd Quarry Extensions

Likely unacceptable impacts upon the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), the Special Area of Conservation (SAC) and the Ramsar Site; Likely unacceptable impact upon the Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI). In respect of parcel 23 (Allen's Bank), the likely unacceptable impact upon archaeological interests. It is noted that the impact upon the setting and character of the historic town of Lydd is uncertain.

M7 Central Road

Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable loss of biodiversity habitat, impact upon Local Wildlife Sites (LWS) and UK Biodiversity Action Plan (BAP) interests, likely unacceptable impacts on residential amenity, likely unacceptable air quality impact on AQMA and conflict with Local Plan open space objectives.

M8 West Malling Sandpit

Inconsistent with green belt policy with regard to inappropriate development. An alternative promoted soft sand site at Chapel Farm, Lenham lies outside the Green Belt and is considered acceptable in principle to meet the soft sand mineral requirements in Kent. It is not therefore reasonable to conclude that the necessary 'very special circumstances' exist to override the presumption against inappropriate development within the Green Belt. It is noted that the site is within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB) and the impacts upon the AONB are uncertain.

M11 Joyce Green Quarry

Likely unacceptable highway impacts on Bob Dunn Way (A206) and on M25 Junction 1a (Dartford Crossing), likely unacceptable air quality impact on AQMA, likely unacceptable loss of biodiversity habitat, impact upon LWS and UK Biodiversity Action Plan (BAP) interests and uncertainty that restoration proposals would meet ecological objectives to replace habitat. The mineral proposal is considered to be inappropriate development within the Green Belt through restoration proposals and harm arising from highway impacts, air quality and biodiversity impacts.

M12 Postern Meadows

Insufficient evidence to conclude with any certainty that the development is acceptable in principle for mineral development.

Three sites are proposed for allocation in the Pre-submission MSP. These sites are judged to have acceptable or mitigable impacts following detailed technical assessment, consultation and review of the findings of the SA:

M3 Chapel Farm

The western part of the site is suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage. The eastern part of the site has been withdrawn by the promoter due to likely unacceptable impact on heritage asset.

M10 Moat Farm

Suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage.

M13 Stonecastle Farm Quarry Extension

Suitable for allocation in Pre-Submission Draft MSP, subject to meeting development management criteria at planning application stage.

An outline of the process to date is presented in Figure 1, below. At the time of reporting Step 10 is nearing completion.



Figure 1 Summary of the parallel planning and SA processes

4.3. Difficulties Encountered

A number of difficulties were encountered in undertaking the appraisal:

• **Data.** A common problem affecting SA is the availability and reliability of data. Although data has been collected to illustrate a number of the conditions and trends relevant to the SA of the MSP, some

data sets are more useful than others, and some data sets are known to be old, incomplete or unreliable. In some cases, no data is available. It is therefore almost impossible to quantify effects with total certainty. The SA has relied on technical assessments produced by other organisations, either by the promoter of a site or their agents/consultants or on information provided by consultees including statutory consultees. The sites typically had varying amounts of information available in technical assessments.

• Uncertainty. Some of the sites proposed for mineral development are accompanied by proposals for mitigation of some impacts. Until planning applications are submitted and full operational details and an Environmental Statement are provided, it is not possible to be certain how significant the impacts will be and whether impacts can be successfully mitigated. All of the sites that are allocated in the MSP will be required to be compliant with the policies in the KMWLP but it has not been assumed that this will be sufficient to guarantee no adverse impacts. The SA makes recommendations for mitigation of effects, including where this should be addressed within planning applications when sufficient technical detail is available.

5. How has the appraisal at this current stage been undertaken? [Sustainability Appraisal Methodology]

5.1. SA Framework and Sustainability Objectives

Following due diligence in terms of the context and baseline conditions, the Framework and Sustainability Objectives for the SA of the MSP has been developed using that produced by URS (2013). The relationship between the 2010 Scoping and 2013 SA Report objectives is presented in Table 5 below, which also expands on the detail of the objectives and the additions made following the 2017 Scoping exercise and review of the NPPF 2018 and the 25 Year Environment Plan.

Susta	ainability Objectives	Corresponding SO	Detail – including additions resulting from MPS SA Scoping (Amey,
(URS	, 2013)	(Scott Wilson, 2010)	2017) and additions resulting from review of NPPF and 25YEP
1	Biodiversity	SO2	Ensure that development will not impact on important elements of the biodiversity resource and where possible contributes to the achievement of the Kent BAP and other strategies - Add to the biodiversity baseline by creating opportunities for targeted habitat creation (which, ideally, contributes to local or landscape scale habitat networks). - Avoid hindering plans for biodiversity conservation or enhancement
2	Climate change	SO5	 Support increased access to biodiversity Address the causes of climate change through reducing emissions of greenhouse gases through energy efficiency and energy generated from renewable sources Promote sustainable design and construction of facilities and support wider efforts to reduce the carbon footprint of minerals operations.
3	Community and well-being	SO9, SO7	Support efforts to create and sustain sustainable communities, particularly the improvement of health and well-being; and support the delivery of housing targets - Help to redress spatial inequalities highlighted by the Index of Multiple deprivation. - Help to tackle more hidden forms of deprivation and exclusion, such as that which is experienced in rural areas and particular socio-economic groURS within communities. - Ensure that the necessary aggregates are available for building, and that the necessary waste infrastructure is in place to support housing growth - Ensure that minerals development does not contribute to poor air quality particular reference to PM2.5. - Protect and enhance public rights of way and access

			– Protect local green space
4	Sustainable	SO11	Support economic growth and diversification
	economic growth		– Support the development of a dynamic, diverse and knowledge-
	i I	! !	based economy that excels in innovation with higher value, lower
	I I	I I	impact activities
	I I	I I	_ Stimulate economic revival and targeted employment generation
	1	1	in deprived areas
5	Flood risk	SO1	Reduce the risk of flooding and the resulting detriment to public
			wellbeing, the economy and the environment
	i	i	– Ensure that development does not lead to increased flood risk on
	I I	I I	or off site
	I I	I I	Seek to mitigate or reduce flood risk through developments that
	1	I I	are able to slow water flow and promote groundwater recharge
6	Land	S08	Make efficient use of land and avoid sensitive locations
	1	 	– Make best use of previously developed land
			– Avoid locations with sensitive geomorphology
	!	I	Recognise the economic and other benefits of the best and most
	I I	I I	versatile agricultural land
	I I	I I	- Prevent inappropriate development in the Green Belt
7	Landscape and	SO3	Protect and enhance Kent's countryside and historic environment
	the historic	 	- Protect the integrity of the AONBs and other particularly valued or
	environment		sensitive
	i I	! !	landscapes
	1	I I	- Take account of the constraints, opportunities and priorities
	I I	I I	demonstrated through landscape characterisation assessments and
	1	1	other studies at the landscape scale.
	1	I I	- Protect important heritage assets and their settings, as well as
			take account of the value of the character of the wider historic
	i	i	environment
8	Transport	SO6	Reduce and minimise unsustainable transport patterns and facilitate
	I I	I I	the transport of minerals and waste by the most sustainable modes
	1	I I	possible
	1	1	– Minimise minerals and waste transport movements and journey
			lengths; and encourage transport by rail and water.
			– Ensure that minerals and waste transport does not impact on
	1	I I	sensitive locations, including locations already experiencing
	-	I I	congestion and locations where planned growth or regeneration is
			reliant on good transport networks.
9	Water	SO4	Maintain and improve the water quality of the Kent's rivers, ground
		1	waters and coasts, and achieve sustainable water resources
. .			management

		Ensure that minerals and waste development seeks to promote
i i i		the conservation of water resources wherever possible particular
I I I I		reference to abstraction.
		$^{ m I}_{ m I}$ – Avoid pollution of ground or surface waters, particularly in areas $^{ m I}_{ m I}$
		identified as being at risk or sensitive
Scoped out of URS	SO10 [waste]	
(2013)		1 1

Table 8 SA Framework

5.2. Applying the Framework

5.2.1 Effects Categories and Assumptions

The SA of sites was undertaken by URS in 2012 for the sites that at the time were deemed to be Preferred Options. Although the outcome of this exercise is no longer relevant due to subsequent changes to the MWLP and different sites being put forward at the refresh call for sites, the Effects Categories (Figure 2) and underpinning assumptions (as amended) (Appendix B) have been used in the current exercise.

	Symbol
Significant positive effect	++
Some positive effect	+
No effect	0
Some adverse effect	•
Significant adverse effect	
Uncertain effect	?

Figure 2 Effects categories (URS, 2012)

5.2.2 SA of the Site Selection Methodology

Kent's Site Selection Methodology was published in June 2016 and is comprehensively detailed in the MSP Scoping Report (Amey, 2017). In brief, it has four stages as follows – of which Stages 1 and 2 have been undertaken to date [and of which SA forms part of Stage 3]:

- Stage 1 Alignment with Scope of Sites Plan
- Stage 2 Initial Screening RAG rating to define the 'Reasonable Alternatives' (Appendix B).
- Stage 3 Detailed Technical Assessment to demonstrate sites' potential as possible 'Preferred Options'
 for allocation in the Minerals Sites Plan. For the Preferred Options Consultation stage of the Kent
 Minerals Sites Plan technical assessment is more limited to an understanding of the main constraints

and how they can be mitigated to enable any promoted site to be identified as a Preferred Option for Regulation 197 consultation purposes.

Stage 4 – Identification of Preferred Site Options.

Following Preferred Options consultation (Regulation 18), the County Council has identified those sites that should be considered as potential allocations in the Minerals Sites Plan.

The KCC Site Selection Methodology (June 2016) has not yet been subject to Sustainability Appraisal as it was produced after the adoption of the KCC Local Minerals and Waste Plan (which was last modified May 2016). The methodology – in terms of the information sought and its method of RAG assessment – has therefore been subject to assessment using the SA framework developed by URS in their 2013 SA Report (see Appendix B), and with reference to the assumptions underlying the approach adopted by URS as part of the 2012 assessment of Preferred Options and which was subject to SA at that time. These assumptions have been amended to reflect the findings of the review of the NPPF 2018.

An assessment matrix has been drafted and is presented in Appendix C.

5.2.3 SA of the Minerals Sites

The SA is required to undertake an appraisal of the 'reasonable alternatives' for the MSP. Each of the eight sites which were carried forward as potential allocations have therefore been assessed as a reasonable alternative for the MSP. Each of these sites has therefore been subject to assessment using the SA framework developed by URS in their 2013 SA Report as amended (see table 8). An assessment matrix has been drafted and is presented in Appendix D.

As discussed in Section 3.2; it has been assumed that the baseline conditions within Kent remain unchanged from those detailed within the URS Sustainability Appraisal and Addenda published to date.

It can be seen by reviewing the URS 2012 underpinning assumptions that these are an assessment of the proximity of a proposed site to sensitive receptors or environmental constraints. At this stage in the process of the development of the MSP, a considerable amount of detailed technical information is now available about the nature of operations at the sites, such as hours of operation, vehicle movements and environmental constraints. A number of site-specific technical assessments have also been undertaken, including assessments of impacts on transport, landscape and visual, ecology, archaeology, green belt, hydrology and others. It is essential that the SA takes account of this detailed information in drawing conclusions about the likely impacts of developments at the proposed sites.

Because of this, the URS 2012 underpinning assumptions have been used as a starting point to understand the proximity of the sites to constraints/opportunities. These underpinning assumptions have been

⁷ The Town and Country Planning (Local Planning) (England) Regulations 2012

supplemented by the available technical information to make a more accurate assessment of the likelihood and significance of any impacts rather than simply the proximity of a site to constraints/opportunities.

The appraisal of sites has considered a range of different types of effects as required by Annex I of the SEA Directive, namely: secondary effects; effects in the short, medium and long term; whether effects are permanent or temporary; and positive and negative effects. The type of effects identified are indicated in the tables in Appendix D.

Effects are identified in the short, medium and long term. To make this assessment, the short term has been chosen as being within the first 5 years of adoption of the MSP, the medium term is considered to be the operational life of the site and the long term is after the site has been restored.

An assessment has also been made of the probability of the identified effect occurring (low, medium or high), whether the effect is direct or indirect, and whether the effect is temporary or permanent indicated by whether or not the effect could be reversed.

Cumulative and synergistic effects are discussed in Section 6.4.

In order to determine the significance of effects, the appraisal has followed the criteria for determining significance as set out in Annex II of the SEA Directive.

Sites which come forward for development under the MSP will be required to comply with policies in the KMWLP. These include development management policies in the KMWLP to manage and mitigate the impacts of development. For several of the sites, but not all sites, the promoters have proposed mitigation measures to address likely impacts that have already been identified. In undertaking the appraisal, it has been assumed that any mitigation that has already been proposed will be implemented to address the potential impacts of development. It is also assumed that if no mitigation has been proposed then the potential effects are unmitigated at this stage. In order to comply with development management policies in the KMWLP, it is expected that sites will be required to provide mitigation where necessary or desirable, but no assumptions have been made as to what that mitigation would be and whether it would be sufficient to address impacts.

The appraisal has assessed the likely effects arising from development at each of the sites. Where appropriate, the appraisal has made recommendations for mitigation which is necessary or desirable to address the predicted effects of development. These recommendations are set out in the tables in Appendix D.

5.2.4 SA of Alternatives to Land-Won Aggregates

With its coastal location, Kent fulfils an important role in the importation of minerals including a range of construction aggregates from mainland Europe, as well as marine dredged aggregates (MDA) and imported recycled and secondary materials. Kent benefits from a number of aggregate wharves, into which significant quantities of MDA and crushed rock are landed, 1.7 million tonnes (mt) being imported into its wharves in

2013 and of the total of 3.13mt of MDA landed in Kent and Medway in 2009 (1.41mt into Kent), 2.5mt was consumed within Kent and Medway. Land-won sharp sand and gravel is also imported by rail and road from areas beyond Kent. Assurances regarding the security of these minerals imports during the Plan period were obtained in developing the KMWLP.

In addition to the land-won maintenance of landbanks to support a steady future supply of aggregate in Kent, policy CSM 8 of the adopted Kent Minerals and Waste Local Plan 2013-30 states that sites will be identified in a Minerals Sites Plan to produce recycled and secondary aggregates to ensure a processing capacity of at least 2.7 million tonnes to maximise the availability of alternatives to marine-won and local land-won sand and gravel extraction. Current capacity of production in this sector is some 3.45 million tonnes per annum. Additional sites were therefore not needed at the time of development of the KMWLP to meet the Plan's requirements.

The KMWLP contains strategic objectives to

- Promote and encourage the use of recycled and secondary aggregates in place of land-won minerals.
- Safeguard existing, planned and potential sites for mineral infrastructure including wharves and rail
 depots across Kent to enable the on-going transportation of marine dredged aggregates, crushed rock
 and other minerals as well as other production facilities.

The KMWLP also contains policy to support the increased use of secondary and recycled aggregates and wharves and rail depots:

- Policy CSM seeks to maintain and increase production capacity of secondary and recycled aggregates;
- Policy CSM 6 seeks to prevent non-minerals development that may unacceptably adversely affect the operation of existing, planned or potential safeguarded wharves and rail depots, such that their capacity or viability for minerals transportation purposes may be compromised.

The most recent Local Aggregates Assessment⁸ reports that with regard to recycled and secondary aggregates and wharves there is significant available headroom. In 2016 it is shown that there was a spare capacity of 73% for managing recycled and secondary aggregate and 75% spare capacity for managing mineral at wharves. There is potential to provide almost an additional 2.8 million tonnes of secondary and recycled aggregates over the current demand of 1.03 million tonnes if more CD&E waste becomes available to contribute to aggregate supply needs. The rail depots would appear to have less capacity headroom, though sufficient capacity to cope with an increase to ensure an adequate and steady supply of aggregate.

Importation of aggregates in the form of largely marine dredged sands and gravels and crushed rock continue to be very significant in overall supply terms, accounting for 3.55 million tonnes of the total 6.14

⁸ Local Aggregates Assessment 2017, Kent County Council, May 2018

million tonnes produced overall in Kent in 2016. This accounts for almost 58% of total supply. In both cases the last three year sales averages are greater than the last 10 year sales average for imported crushed rock and marine dredged aggregates which clearly indicates that importation is becoming more important than the land-won alternatives in overall supply terms. Soft sand is not generally supplied from marine won sources and so remains essentially a Kent land-won resource that is not being supplanted in the supply chain by imports to any great extent. The wharves in Kent are operating at 25% of their available capacity and, while this appears low, the Local Aggregates Assessment reports that as the land-won reserves of sharp sands and gravels are depleted the need for marine dredged sands and gravels to meet identifiable and objectively assessed needs will increase.

The 2017 LAA reports the Crown Estate as stating in 2012 that "The marine aggregate resource available in the East Coast, Thames Estuary and East English Channel areas and which are used to supply Kent wharves is 994 million tonnes of which 31.25 million tonnes is permitted for extraction per annum. Kent wharves only received some 1.3 million tonnes (4.2% of total permitted per annum) in 2010, but increased in 2011 with 1.55 million tonnes (5%). There is therefore a long term viable and sustainable supply of marine dredged aggregate both for construction uses and for direct beach nourishment by vessel delivery."

It is therefore reasonable to assume that an increased supply of secondary and recycled aggregates and MDA is an alternative to the mining of some land-won sharp sand and gravels. It is also reasonable to assume that some land-won aggregates could be imported into Kent from sites outside of Kent. This has therefore been appraised as an alternative to the allocation of sites for sharp sand and gravel. The results of this appraisal are set out in detail in Appendix E and summarised in Section 6.3.

The same is not true for soft sands. Artificial 'soft sands' have not been developed (if technically possible) and soft sands as imports are relatively marginal in the overall supply chain. It is clear that an alternative to the land-won soft sands, that will provide a steady and adequate supply as required by the National Planning Policy Framework, is unavailable at this time. Neighbouring authorities support the allocation of sites suitable for the development of soft sand on the basis that this would help address a wider issue that the vast majority of soft sand in the unconstrained south east is being progressively exhausted, and much of what remains is constrained by designations such as AONBs or National Parks (such as the South Downs).

6. Sustainability Appraisal Findings and Recommendations

6.1. SA of the Site Selection Methodology

The KCC Site Selection Methodology (June 2016) has not previously been subject to Sustainability Appraisal. The SA Scoping Report proposed that the methodology – in terms of the information sought and its method of RAG assessment – would be subject to Sustainability Appraisal using the SA framework and objectives developed as part of the Scoping Report. The KCC Site Selection Methodology RAG assessment has therefore been subject to assessment using the SA framework as amended. The detailed results of this assessment are set out in Appendix C and the findings and conclusions are summarised in Table 9.

KCC RAG	Implications for SA Sustainability Objectives
Opportunity/Constraint	
Landscape	The KCC approach corresponds with the scope of the SA Sustainability
	Objective in landscape terms.
Nature conservation and	Assessment methodologies are compatible in looking at impacts on
geodiversity interests	biodiversity. The SA Sustainability Objectives are more comprehensive
	in looking at access to biodiversity which can be provided in restoration
	plans.
Historic environment	Assessments are compatible.
Water environment including	The methodologies are compatible on flood risk management and
flooding	impacts on water quality and resources.
Air quality	Air quality is considered by both approaches in terms of acceptability
	and impacts on health and wellbeing. The SA Sustainability Objective
	explicitly looks at the impacts on climate change while the RAG
	methodology does not, although there will be limited scope for mineral
	sites to ameliorate impacts.
Soil quality	The KCC approach makes reference to agricultural land classification,
	however the SA approach does not. This has been added into the SA
	appraisal objectives to ensure that this aspect is included in the
	appraisal.
Public Rights of Way (PRoW)	The SA Sustainability objectives consider sustainable communities
	including in relation to health and wellbeing. The appraisal has
	considered the impact on PRoWs as a component of this.
Transport (including	The methodologies are compatible in terms of access and impacts, but
proximity, access and	the SA is more comprehensive in considering sustainable transport and
impacts)	minimising the need for transport. This is indirectly linked to climate
	change and air quality impacts as well as network impacts.

Services and utilities	Services and utilities need to be accessible and connections maintained,
	but this was not considered significant for the SA Sustainability
	Objectives.
Health and amenity	Approaches appear to be comparable.
Cumulative impacts	The SA does not include cumulative effects within the SA Sustainability
	Objectives but it is a required part of the appraisal.
Airport safeguarding	The SA does not explicitly consider Airport Safeguarding.
Green Belt (for sites in the	The consideration of impacts on green belt has been added to the SA
Green Belt the 'very special	Sustainability Objectives.
circumstances' test will be	
applied)	

Table 9: Summary of Findings of SA of KCC Site Selection Methodology

Following this assessment, amendments to the SA Sustainability Objectives have been made as described in the above table and the SA of sites which constitute reasonable alternatives have been assessed against this revised framework.

6.2. SA of the Sites

The SA has appraised each of the sites which are considered to be reasonable alternatives for the MSP. The methodology and assumptions used in undertaking the appraisal are set out in Section 5.

The detailed findings of the SA of sites are set out in Appendix D. Where appropriate, for each individual site and each effect identified, mitigation is recommended to address the effects and where possible avoid or minimise potential adverse effects. The findings of the SA of sites are summarised in Table 10 and discussed below.

	Sustain	Sustainability Objective								
Site	1 Biodiversity	2 Climate change	3 Community and wellbeing	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the historic	8 Transport	9 Water	
M2 Lydd Quarry		?	-	++/-	?	-/?	0/?	?	-	
Extensions										
M3 Chapel Farm	-	-	-	++/-	0	-	-/?	?	-	
M7 Central Road		-	-	++/-	?	-	?		-	
M8 West Malling Sandpit		-	-	++/-	?	-/?	-/?	?	-	
M10 Moat Farm	?/-	0	-	++/-	?	?	-/?	0	-	
M11 Joyce Green Quarry		-	-	++/-	?	?	?			
M12 Postern Meadows	-/+	-	-	++/-	?	?	-/?	-	-	
M13 Stonecastle Farm	-/+	0	0	++/-	?	0/?	?	0	-/?	
Quarry										

Table 10: Summary of Findings of SA of Sites

Discussion

The aspect of the Minerals Sites Plan where there is the most potential to give rise to negative impacts is on biodiversity. All of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and in some cases the impacts are likely to be significantly adverse, notably for the Lydd Quarry extensions and the two sites in the Dartford Marshes. It will be important for all planning applications to fully assess the impacts on biodiversity, to provide mitigation where possible and where this is not possible to provide replacement habitat of equal value. Some restoration proposals aim to restore the site to biodiversity habitat, but it is not clear in all cases that this can be achieved to a satisfactory degree.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are insignificant when considered in the context of emissions from the county as a whole.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion or removal of footpaths. In most cases is should be possible for mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts, although in some cases adverse effects could not be mitigated and are still likely, although cumulative impacts are not likely to be significant.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

Some of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

Some of the minerals sites contain soils which are classed as the best and most versatile agricultural land. In some cases this soil will be lost as restoration is to wetland/open water. If the restoration is to agricultural land, this should be to at least the grade of soil removed, and where possible the same soil should be retained for reuse. In one case, development of the site will result in the removal of a geomorphological SSSI. Some of the sites lie within the Metropolitan Green Belt, in which case it must be demonstrated that operations will not constitute inappropriate development or constitute very special circumstances. Given that sites will be restored to agricultural or wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.

There is the potential for several of the sites to have impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the significance of impacts is minimised. Adverse impacts on the AONBs are not likely to be significant.

Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and it is estimated that these will range between 3 movements per hour to 9 movements per hour depending on the site. In addition, staff vehicles will access the sites, ranging from an estimated 6 to 12 movements per day. For sites M10 and M13, operations are planned to run sequentially with existing extraction in the locality so that the impacts from vehicles are likely to be no greater than existing impacts. It is possible for cumulative impacts from transport to occur from more than one minerals site, in the case of M7 which would act cumulatively with site M11, and in the case of M12 which would act cumulatively with sites M10 and M13. However, the scale of the cumulative impact of the MSP overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. The area with potentially the most significant constraint is for sites M7 and M11 in the context of congestion on the M25 and local roads. These sites must be able to demonstrate the road network is able to accommodate site traffic without adverse impacts on congestion and air quality. It is unlikely that the Minerals Sites Plan will support the use of sustainable modes of transport for minerals.

Some of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water quality. In some cases operation and/or restoration to wetland could affect local hydrology. However, the cumulative impacts from all sites in the Minerals Sites Plan is not expected to be significant for the county as a whole.

Overall Impacts of MSP

Partly as a result of the above findings of the SA of sites, some of the sites are not proposed for allocation in the Pre-submission MSP. The sites that are proposed for allocation are M3 Chapel Farm (western part only), M10 Moat Farm and M13 Stonecastle Farm Quarry Extension. The following table summarises the conclusions about the impact of the MSP overall with these three sites proposed for allocation.

		Sustainability Objective							
Site	1 Biodiversity	2 Climate change	3 Community and	4 Sustainable economic growth	5 Flood risk	6 Land	7 Landscape and the	8 Transport	9 Water
M3 Chapel Farm	-	-	-	++/-	0	-	-/?	?	-
M10 Moat Farm	?/-	0	-	++/-	?	?	-/?	0	-
M13 Stonecastle Farm Quarry	-/+	0	0	++/-	?	0/?	?	0	-/?
Overall impacts	-	-	-	++/-	?	?	-/?	?	-/?

Table 11: Summary of Findings of SA of MSP Overall

Each of the sites contain or are adjacent to some form of biodiversity asset or biodiversity value and impacts are possible in each case. It will be important for planning applications to fully assess the impacts on biodiversity, to provide mitigation where possible and where this is not possible to provide replacement habitat of equal value. Restoration proposals at two of the sites aim to restore the site to biodiversity habitat which will help to mitigate any potential loss.

The Minerals Sites Plan is likely to increase emissions of greenhouse gases overall by generating additional HGV movements and increasing the energy requirements for mineral processing on site. However, these are insignificant when considered in the context of emissions from the county as a whole.

Some negative impacts are possible on community wellbeing, mainly due to the potential for negative impacts on residential amenity from operations and transport, and also on the diversion or removal of footpaths. It should be possible for mitigation to adequately minimise impacts from dust, noise, vibration, light and visual impacts, although cumulative impacts are not likely to be significant.

The Minerals Sites Plan will help to contribute to economic growth by providing a supply of minerals to support construction and potentially other economic sectors that depend on aggregates. By facilitating the extraction of primary aggregates, the Minerals Sites Plan is exploiting a non-renewable resource, which cannot be considered sustainable.

Two of the minerals sites lie within Flood Zone 3. In these cases, it must be demonstrated that

development can take place without adversely affecting flood risk and where possible contributing to a reduction in overall flood risk.

One of the minerals sites contains soil which is classed as the best and most versatile agricultural land, although restoration to agricultural land is proposed and therefore the impact of the MSP on soil quality is not likely to be significant. Two of the sites lie within the Metropolitan Green Belt, in which case it must be demonstrated that operations will not constitute inappropriate development or constitute very special circumstances. Given that sites will be restored to wetland habitat, lasting cumulative impacts on the Green Belt are not envisaged.

There is the potential for the sites to have limited impacts on landscape and on the historic environment. However, it will be possible to provide mitigation such that the significance of impacts is minimised. Adverse impacts on the AONBs are not likely to be significant.

Minerals sites generate vehicle movements accessing and leaving the sites. The majority of these are HGV movements and it is estimated that these will range between 4 movements per hour to 8 movements per hour depending on the site. In addition, staff vehicles will access the sites, around an estimated 10 movements per day. For sites M10 and M13, operations are planned to run sequentially with existing extraction in the locality so that the impacts from vehicles are likely to be no greater than existing impacts. The scale of the cumulative impact of the MSP overall is not expected to be great given the predicted number of movements and the context of all traffic movements in the county. It is unlikely that the Minerals Sites Plan will support the use of sustainable modes of transport for minerals, although the KMWLP safeguards railheads and wharves to support rail and water transport of minerals.

Each of the minerals sites have the potential for significant impacts on hydrology/hydrogeology and water quality. Restoration to wetland could affect local hydrology. However, the cumulative impacts from all sites in the Minerals Sites Plan is not expected to be significant for the county as a whole.

6.3. SA of the Alternatives to Land-Won Sand and Gravel

In addition to the site options of the MSP, the SA has identified that there is an alternative to the allocation of sites for extraction of land-won aggregates and that is the increased supply of secondary and recycled aggregates, marine-dredged aggregates and import of land-won aggregates from outside of Kent. The detailed findings of the SA of this alternative are presented in Appendix E and summarised below.

The increased supply of marine-dredged aggregates (MDA), secondary and recycled aggregates and land-won aggregates from outside Kent will help to reduce the potential negative impacts associated with proposed site allocations. These include negative impacts on biodiversity, water quantity and quality, landscape, the historic environment, agricultural land, Green Belt and flood risk which are associated with some of the sites. Some of these negative impacts from some land-won aggregate sites are still likely as sites are still likely to be needed to meet requirements. The scale of the benefits will depend on which sites are replaced by the supply of alternatives which is unknown.

Opportunities for habitat improvement and improved access through restoration will be lost, although the loss of this benefit is unlikely to be significant. There may be biodiversity impacts associated with transport of alternative aggregates through noise, disturbance and effects on air quality, but this is unlikely to be significantly different from that associated with land-won aggregates. MDA may have adverse effects on marine biodiversity, but the likelihood and significance of any effects is unknown.

The increased supply of secondary and recycled aggregates and MDA will contribute to ensuring the supply of aggregates to support construction to the benefit of current and future communities and to support economic growth. The use of secondary and recycled aggregates avoids the use of non-renewable resources and therefore constitutes a more sustainable route to growth. The use of MDA is a non-renewable resource and is not a sustainable route to growth.

There may be some scope to transport aggregates from safeguarded wharves by rail and recycled aggregates from safeguarded rail depots. This will help to promote the transport of materials by more sustainable modes than road transport. It will also help to reduce the potential for adverse impacts on air quality from road transport, although the scale and significance of this will depend on which land-won sites would be replaced by alternative aggregate supply and whether this will avoid areas of poor air quality. This is unknown at this stage. The likely proportion of either MDA or recycled aggregates transported by rail is unknown and therefore the significance of any benefits is also unknown. Any imports of land-won aggregates from outside of Kent are likely to be by bulk transfer to be economic, and therefore most likely to be transported by rail or through wharves, enabling a more sustainable mode of transport to be used than road. The climate change effects of this bulk transport are uncertain as this will depend on the distance the material has travelled which is not known. Railheads and wharves are safeguarded in the KMWLP to support bulk transfer of minerals.

There will be climate change impacts associated with the energy requirements for processing and transport of secondary and recycled aggregates and MDA and land-won aggregates from outside of Kent after these are deposited at railheads or wharves, although these impacts are not likely to be significantly different from the processing and transport of land-won aggregates from Kent.

6.4. Cumulative Effects and Inter-Relationship Between Effects

Cumulative Effects

The SEA Directive requires assessment of an additional level of impacts in addition to straightforward direct impacts. These are specified as "secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative". The following approach has been taken to identifying such impacts.

A number of different types of impact are set out in European Commission guidance:

separate developments causing the same impact – cumulative;

- different impacts acting together on a receptor e.g. air pollution and land take cumulative;
- plan impacts which give rise to other indirect impacts secondary; and
- different impacts which together give rise to yet another impact cumulative and secondary.

There is therefore a need to consider both secondary and cumulative impacts in the appraisal. Secondary impacts were considered as an integral part of the main appraisal work, and this is indicated in the appraisal matrices in Annexes D and E where impacts are either direct or indirect i.e. secondary. Certain other attributes are common to all types of impact: these are timescales (i.e. short, medium and long-term impacts), reversibility (i.e. permanent or temporary impacts) and whether the impacts are positive or negative. These attributes were also all considered as integral aspects of impact assessment, and this is similarly indicated in the appraisal matrices in Annexes D and E. Cumulative impacts are discussed in this section of the SA Report.

There are two types of situation that could give rise to cumulative impacts:

- the same effect arising from two or more different sources; and
- different effects where there is a relationship between the effects and potentially an interaction.

Synergistic effects are a type of cumulative impact. These are effects where the cumulative impact may be greater or smaller than the sum of the separate effects. Cumulative impacts were considered in the appraisal in two ways:

- the potential for different developments to give rise to the same type of effect; and
- the potential for interaction between different types of effect.

In order to assess the cumulative impacts arising from all potential developments under the Minerals Sites Plan, the appraisal considered the overall effect of the Plan as a whole on each of the SA objectives. The results of this are summarised in tables 10 and 11 and discussed in section 6.2.

Cumulative Impacts in Combination with Other Plans and Strategies

The appraisal has considered the potential for effects arising from other plans and strategies which, in combination with effects arising from the Minerals Sites Plan, may give rise to significant impacts. The results of the review of other plans and strategies and their potential to give rise to cumulative effects is set out below.

The following key plans/programmes have been identified that could give rise to significant cumulative impacts together with the Minerals Sites Plan:

Shepway Core Strategy Local Plan, Shepway District Council, September 2013;

- Council Core Strategy Review, Consultation Draft Plan, Shepway District Council, March 2018;
- Maidstone Borough Local Plan, Maidstone Borough Council, October 2017;
- Submission Local Plan 2030, Ashford Borough Council, December 2017;
- Local Plan Regulation 19 Pre-submission Publication, Tonbridge and Malling Borough Council,
 September 2018;
- Site Allocations Local Plan, Tunbridge Wells Borough Council, July 2016;
- Core Strategy DPD, Tunbridge Wells Borough Council, June 2010;
- Dartford Core Strategy, Dartford Borough Council, September 2011;
- Bexley Core Strategy, London Borough of Bexley, February 2012;
- Bexley Growth Strategy, December 2017;
- Core Strategy and Policies for Management of Development (as amended), Thurrock Council, January 2015;
- Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031, Kent County Council;
- Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, February 2013;
- Waste and Minerals Sites Plan, East Sussex County Council, February 2017;
- Core Strategy, Rother District Council, September 2014;
- Local Transport Plan 3 2011-2026, East Sussex County Council, June 2011;
- New London Plan Consultation Draft, London Assembly, December 2017;
- Minerals and Waste Local Plan 2013-30, Kent County Council, July 2016;
- Regulation 19 Consultation: Partial Review of the Kent Minerals and Waste Local Plan 2013-30, Kent County Council, December 2017.

The relevant sections of each of these with the potential to give rise to cumulative effects is summarised in Appendix F, noting the relevant minerals sites affected. An assessment has been made of the potential contribution to significant cumulative effects in combination with the Minerals Sites Plan and this is discussed below.

The main area where there is the potential for cumulative effects to arise in combination with the Minerals Sites Plan is in relation to impacts on the road network and in some cases also on air quality. All minerals sites are near to areas proposed for housing and economic growth, in some cases significant levels of

growth. The growth provided for in plans and strategies will give rise to additional demands for access to road space. In most cases, plans are also in place for measures to manage this demand, including through infrastructure improvements and promotion of more sustainable modes of transport, although the degree to which such measures will offset the increased demand is uncertain. In all cases, it is likely that the demand for access to the road network from planned housing and economic growth will be significantly greater than the demand from minerals developments.

There is synergy between the MSP and local plans and strategies, in that all local plans provide for significant amounts of housing and employment growth and this will be assisted by the MSP ensuring that there are sufficient available reserves of the minerals required by the construction sector and for other economic uses.

There are likely to be cumulative pressures on biodiversity due to the development of some greenfield sites for housing and economic uses and the loss of sites of biodiversity value to minerals developments, but it is uncertain what the scale of these cumulative impacts will be and what their significance is.

Interrelationship Between Effects

The SEA Directive requires the appraisal to consider the interrelationship between the significant effects of the Minerals Sites Plan. This has been done as an integral part of the appraisal of the sites and options, and examples of this can be found throughout Section 6 and Annexes C to E of this report. The main interrelationships found through the appraisal are highlighted below.

Impacts on biodiversity can arise through habitat loss, disturbance from noise and human activity, changes to the water environment, reductions in air quality and deposition of dust and other pollutants. These impacts have the potential to act in synergy with each other such that multiple pressures have a greater total impact than the sum of individual impacts. These impacts also have the potential to negatively affect human amenity, along with visual impacts.

Preservation, replacement and enhancement of green spaces and connectivity will be of benefit to biodiversity by ensuring connectivity and protection and enhancement of green and blue infrastructure. It will also benefit human health and quality of life, encouraging active lifestyles and helping to promote sustainable travel by encouraging people to walk or cycle rather than using the car. It can also help to support biodiversity protection and improvement. This will also help to protect landscape quality and help to promote the wellbeing of communities.

Protection of historic features and assets will contribute to maintaining landscape quality in Kent, contributing to preserving its distinctive quality and supporting tourism and the visitor economy.

Changes in air quality can have significant consequences for human health and biodiversity, while improvements in air quality arising from more sustainable transport patterns will benefit human health and vulnerable species and ecosystems. Changes in water quality also have the potential to significantly affect



species and ecosystems, as well as having economic impacts resulting from changes to the availability or quality of water supply.

Flood risk reduction will help to protect and enhance water quality. It will also have economic benefits by protecting homes and businesses from having to deal with the financial consequences of flooding.

7. How might we monitor the plan's impacts?

As required by the SEA Directive, a number of recommendations are made for indicators to monitor the likely significant impacts of the Local Plan. These are set out in Table 12 corresponding to the relevant impacts identified and summarised in the preceding chapters of this report.

One of the aims of monitoring as specified by the SEA Directive is to identify unforeseen adverse effects in order to be able to take appropriate remedial action. To enable this to be done, recommendations are also made in Table 12 for monitoring potential sustainability impacts that are not expected to occur as foreseen by the appraisal.

An Annual Monitoring Report will be produced to monitor the implementation of the Local Plan, and the recommendations given below for monitoring should be incorporated within this.

Sustainabili	ty Objectives	Recommended Indicators
1	Biodiversity	Area of land of biodiversity value lost to minerals development, by significance (international, national, local) Area of land proposed for habitat creation through mineral site restoration Area of accessible land of biodiversity value created through restoration.
2	Climate change	No practical indicators identified.
3	Community and well-being	Sales (tonnage) of aggregates by type and end use Metres/number of public rights of way lost to minerals development Metres/number of public rights of way proposed through restoration of minerals sites. Hectares of designated open space lost to minerals development. Hectares of accessible open space proposed for creation in mineral site restoration.
4	Sustainable economic growth	Sales (tonnage) of aggregates by type and end use
5	Flood risk	Number of flood events near to mineral sites Number of restoration plans proposing restoration to wetland/open water
6	Land	Hectares of good quality agricultural land lost to minerals development Hectares of good quality agricultural land proposed in restoration plans. Area of land of geodiversity value lost to minerals development, by significance

		Hectares of Green Belt land developed for minerals use
	Landscape and	Hectares of land of landscape value taken for minerals development
7	the historic	Number of heritage assets lost to development, by type
	environment	
		Tonnage of minerals transported by road
8	Transport	Tonnage of minerals transported by rail
0	Transport	Accidents on road network involving mineral site traffic.
		Imports and exports (tonnages) of minerals across county boundary.
9	Water	Number of water pollution events linked to mineral sites.

Table 12: Monitoring Recommendations

8. References

Site Selection Methodology (KCC, 2017)

Related to SA of Kent MWLP (adopted 2016):

- AECOM, July 2016 Sustainability Appraisal (SA) of the Kent MWDF SA Adoption Statement
- Scott Wilson, March 2010 SA Scoping Report Introductory Paper URS, 2011 Interim SA Report (Assessment of Preferred Options)
- URS, November 2013 Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan SA Report (Consultation Draft)
- URS, July 2014 Kent County Council: Draft Minerals and Waste Local Plan 2013-30 Habitats Regulations Assessment
- URS, July 2014 Sustainability Appraisal (SA) of the Kent Minerals and Waste Local Plan SA Report Non-Technical Summary

Other references:

- UK Government (2004) Environmental Assessment of Plans and Programmes Regulations 2004
- UK Government (2012) The Town and Country Planning (Local Planning) (England) Regulations 2012
- UK Government (2018) The National Planning Policy Framework
- Shepway District Council (2013) Shepway Core Strategy Local Plan
- Shepway District Council (2018) Council Core Strategy Review, Consultation Draft Plan
- Maidstone Borough Council (2017) Maidstone Borough Local Plan
- Ashford Borough Council (2017) Submission Local Plan 2030
- Tonbridge and Malling Borough Council (2018) Local Plan Regulation 19 Pre-submission Publication
- Tunbridge Wells Borough Council (2016) Site Allocations Local Plan
- Tunbridge Wells Borough Council (2010) Core Strategy DPD
- Dartford Borough Council (2011) Dartford Core Strategy
- London Borough of Bexley (2012) Bexley Core Strategy
- London Borough of Bexley (2017) Bexley Growth Strategy
- Thurrock Council (2015) Core Strategy and Policies for Management of Development (as amended)
- Kent County Council (2016) Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031

- East Sussex, South Downs and Brighton & Hove Councils (2013) Waste and Minerals Plan
- East Sussex County Council (2017) Waste and Minerals Sites Plan
- Rother District Council (2014) Core Strategy
- East Sussex County Council (2011) Local Transport Plan 3 2011-2026
- London Assembly (2017) New London Plan Consultation Draft
- Kent County Council (2016) Minerals and Waste Local Plan 2013-30
- Kent County Council (2018) Regulation 19 Consultation: Partial Review of the Kent Minerals and Waste Local Plan 2013-30

Appendix A: Summary of Relevant Policy Objectives from National Planning Policy Framework 2018 and A Green Future

National Planning Policy Framework

Economy

Planning policies should:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.

Planning policies and decisions should enable:

- the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- the development and diversification of agricultural and other land-based rural businesses;
- it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable

Open space

Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

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Transport

Transport issues should be considered from the earliest stages of plan-making and development proposals,

so that:

the potential impacts of development on transport networks can be addressed;

opportunities to promote walking, cycling and public transport use are identified and pursued;

the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken

into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and

for net environmental gains

Planning policies should be prepared with the active involvement of local highways authorities, other

transport infrastructure providers and operators and neighbouring councils, so that strategies and

investments for supporting sustainable transport and development patterns are aligned.

In assessing sites that may be allocated for development in plans, or specific applications for development, it

should be ensured that:

appropriate opportunities to promote sustainable transport modes can be – or have been – taken up,

given the type of development and its location;

safe and suitable access to the site can be achieved for all users; and

any significant impacts from the development on the transport network (in terms of capacity and

congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

Green Belt

Certain forms of development are not inappropriate in the Green Belt provided they preserve its openness

and do not conflict with the purposes of including land within it, including mineral extraction. Planning

policies and decisions should recognise that some undeveloped land can perform many functions, such as

for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production.

Flood risk

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.

Development should only be allowed in areas at risk of flooding where it can be demonstrated that:

within the site, the most vulnerable development is located in areas of lowest flood risk, unless there

are overriding reasons to prefer a different location;

the development is appropriately flood resistant and resilient;

- it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- any residual risk can be safely managed; and
- safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Natural environment

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Heritage assets

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Minerals

Planning policies should:

 provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;

- so far as practicable, take account of the contribution that substitute or secondary and recycled
 materials and minerals waste would make to the supply of materials, before considering extraction of
 primary materials, whilst aiming to source minerals supplies indigenously;
- safeguard mineral resources by defining Mineral Safeguarding Areas; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);
- set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;
- safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;
- set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;
- when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and
- ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.

A Green Future: Our 25 Year Plan to Improve the Environment

Using and managing land sustainably

- Embedding an 'environmental net gain' principle for development, including housing and infrastructure
- Improving how we manage and incentivise land management, including designing and delivering a new environmental land management system
- Improving soil health and restoring and protecting our peatlands, including developing better information on soil health
- Focusing on woodland to maximise its many benefits
- Reducing risks from flooding and coastal erosion, including expanding the use of natural flood management solutions and putting in place more sustainable drainage systems

Recovering nature and enhancing the beauty of landscapes

- Protecting and recovering nature, including developing a Nature Recovery Network and providing opportunities for the reintroduction of native species
- Conserving and enhancing natural beauty, including reviewing National Parks and Areas of Outstanding Natural Beauty
- Respecting nature in how we use water and reforming our approach to water abstraction

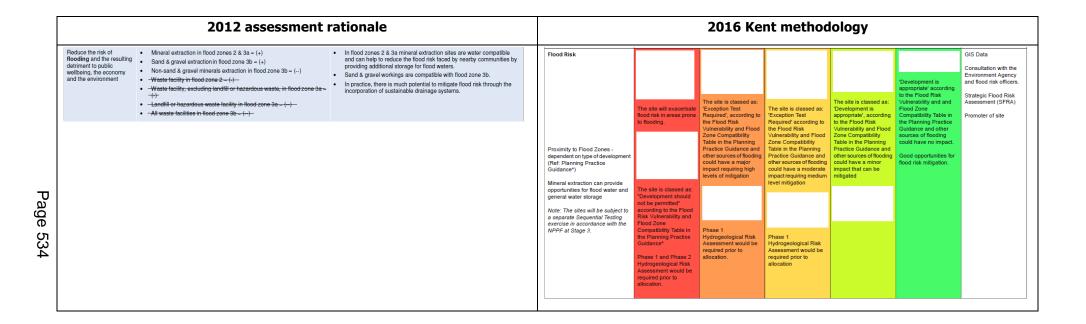
Connecting people with the environment to improve health and wellbeing

- Helping people improve their health and wellbeing by using green spaces
- Creating more green infrastructure

Increasing resource efficiency and reducing pollution and waste

- Maximising resource efficiency and minimising environmental impacts at end of life.
 - Improving management of residual waste
 - Reducing the impact of wastewater
- Reducing pollution
 - Publishing a Clean Air Strategy
 - Curbing emissions from combustion plants and generators
 - Minimising the risk of chemical contamination in our water
 - Ensuring we continue to maintain clean recreational waters and warning about temporary pollution

Appendix B: Assumptions Underpinning Appraisal of Sites (2012 vs 2016)



Project Name: Regulation 19 Consultation

Document Title: Sustainability Appraisal Report – SA of the draft Kent Minerals Sites Plan

2012 assessment rationale	2016 Kent methodology	
Ensure that development will not impact on importance, or an area of ancient woodland = (-) importance, or an area of ancient woodland = (-) importance, or an area of ancient woodland = (-) importance, or an area of ancient woodland = (-) importance, or an area of ancient woodland = (-) importance, or an area of ancient woodland = (-) importance with the subscience of the biodiversity varieties of the subscience of the biodiversity Action Plan and other strategies Site within 200m of a designated site of international, national or local importance, or an area of ancient woodland = (-) importance with a manufacture of the biodiversity Action Plan and other strategies In practice, there is much potential to avoid and mitigate effects where a waste-or minerals site is located in close proximity to an importance in a waste-or minerals site is located in close proximity to an important biodiversity site. Indeed biodiversity with a waste-or minerals site is located in close proximity to an importance or a waste-or minerals site is located in close proximity to an importance or a waste-or minerals site is located in close proximity to an importance or a waste-or minerals site is located in close proximity to an importance or a waste-or minerals site is located in close proximity to an importance or a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or minerals site is located in close proximity to a waste-or mineral site is located in close proximity to a waste-or mineral site is located in close proximity to a waste-or mineral site is located in close proximity to a waste-or mineral site is located in close proximity to a waste-or mineral site is located in close proximity to a waste-or mineral site is located in cl	Nature Conservation and Geodiversity (**) The site is likely to have a significant effect on international and mational designations. E.g. S.AC, SPA, Ramsar. Proximity to international designations and adequate mitigation measures are essentially not possible. E.g. SSIC, National Nature Reserve, Ancient Woodland. Proximity to Local Designations. E.g. Regionally important (ediversalle). Site is within or could have unacceptable adverse impact on national designations where there is no evidence that the benefits of the development outweigh the impacts. With all designations the proximity, perceived adverse impacts and for mitigation should be considered. The site is likely to have a significant effect on international designations and the significant effect on international designations and designations and designations and designations and designations and the significant effect on international designations and designations and designations and designations and designations and the significant effect on international designations and designations and designations and designations and the surface and the significant effect on international designations and designations and designations and designations and the significant effect on international designations and designations and designations and the significant effect on international designations and designations and designations and the significant effect on international designations and designations and the significant effect on international designations and designations and designations and the significant effect on international designations and the significant effect o	Consultation with Natural England and biodiversity officers
	mitigated or compensated such that there is net benefit. Impact is likely to be severe to moderate. The site is considered to have a moderate impact upon local sensitivity receptors. Impact is likely to be severe to moderate. The site is considered to have a moderate impact upon local sensitivity receptors.	

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2012 assessment rationale					2016 Ke	nt method	lology		
Protect and enhance Kent's countryside and historic environment	Site located within an AONB = (-) Site within 200m of an AONB = (-) Site within 200m of an AONB = (-) Site within 200m of an AONB = (-) Site is located within 100m of a SAM, listed building, or historic park and garden = (-) Site with archaeological potential = (?) Mineral site located or greenfield land within Green Belt = (-) — Waste site located or greenfield land within Green Belt = (-) — Waste site located or greenfield land within Green Belt = (-)	Waste sites are generally unsuitable for the Green-Belt-eithough if—situated on brownlield land a judgament on whether they are have a—greater-effect then the existing use must be made. Sites which have archaeological potential could have positive or negative effects, dependent on the management of excavations. The effect of individual developments on the countryside and historic environment can be influenced by a number of factors, including lines of sight. As such, in practice there is much potential to avoid and mitigate effects where minerals and weste sites and sensitive features are in close proximity.	Landscape Designations/Visual Impact The significance of any landscape and visual impact is dependent on a number of factors, such as the proximity to sensitive viewpoints, presence of screening features, direct effect on landscape fabric, existing landforms and the proximity to Kent's landscape designations of national importance. Kent has two nationally important landscape designations—the Kent Downs and the High Weald Areas of Outstanding Natural Beauty (AONB).	The site is in the AONB, there are no exceptional circumstances? and the development cannot be demonstrated to be in the public interest. The site is in the open countryside and the development would have a sever impact on its intrinsic haracter that cannot be adequately mitigated.	The site is in the AONB but there may be exceptional circumstances and it may be in the public interest. The site is adjacent to or within the setting of the AONB and could have a major adverse impact on the landscape designation that may well require high level mitigation. The site falls outside the AONB and could have a major adverse impact on the landscape that may well be difficult to mitigate. The site is considered to have a major impact upon local sensitivity receptors and/or the intrinsic character of the	and there are exceptional circumstances and it is in the public interest but it could have an adverse impact on the landscape designation. The site is adjacent to or within the setting of an AONB and could have a moderate adverse impact on the landscape designation, that may well require medium level mitigation.	within the setting of the AONB and could have a minor adverse impact or the landscape designation, requiring low level mitigation. The site falls outside the AONB and could have a minor adverse impact or the landscape that could require low level mitigation. The site is considered to have a minor adverse impact upon local sensitivity receptors and/or the intrinsic character of the countryside that may well require low level level mitigation.	AONB or its setting and would have no impact on the landscape designation. The site falls outside the AONB and could have a very minor impact to landscape designation that could be addressed with mitigation. The site is considered to have no impact upon	AONB & High Weal AONB) Consultation with landscape specialis
			Historic Environment Proximity to Kent's heritage assets, including registered historic parks and gardens, Listed Buildings, a conservation area or its setting, World Heritage Sites, Scheduled Ancient Monuments, archaeological sites and features and defined heritage coastline. There is a presumption in favour of preserving Listed Buildings and their setting, nationally important archaeological remains in situ and their setting. Proposals for development should not have an adverse effect on Kent's heritage assets including its fabric, setting, amenity value and arrangements for reinstatement.	The site could cause a severe unacceptable adverse impact on Kent's heritage assets and/or its setting. No opportunity to maintain or enhance historic asset.	countryside that may well require high level mitigation. The site may cause a major adverse impact to Kent's heritage assets and/or its setting in the absence of high level mitigation.	intrinsic character of the countryside that may well require medium level mitigation. The site may cause a moderate adverse impact to Kent's heritage assets and/or its setting in the absence of medium level mitigation.	The site may cause a	any adverse impact to Kent's heritage assets and/or its setting.	GIS data Consultation with Historic England an officers specialised archaeology and th historic environmen Promoter of site

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water resources.

Promoter of site

GIS data

transport and access to

Officer assessment

Soil Quality

Proximity or location of best and

grades Good to Moderate (Grade

3). Where significant development

of agricultural land is unavoidable,

most versatile agricultural land

(Grade 1) and Very Good (2)

2016 Kent methodology

The site contains best

and/or very good and/or

good to moderate land

moderately impacted by

versatile and/or very

good and/or good to

may only require minor

Large parts of the site

well be significantly

adversely impacted by

and/or very good and/or versatile land and/or

ood to moderate which | very good and/or good

land may have a significant negative effect, as the loss of this high-quality land does not represent efficient usage. Minerals and landfill sites score a lesser negative effect, due to the potential for their

restoration

and avoid sensitive locations

2012 assessment rationale Make efficient use of land

- Waste site (excluding landfill) that would result in loss of grade 1 or 2 -

- Waste sites that would result in the loss of grade 1 or 2 agricultural

Minerals or landfill site that would result in loss of grade 1 or 2

Site located on previously developed, brownfield land = (++)

agricultural land = (-)

GIS data

necessary

Consultation with

Natural England if

Officer Assessment

Promoter of site

GIS data

Officer assessment

landscape officers and

The site contains low

poor (Grade 3) and/or

very poor Grade 4) on

best and most versal

Appendix C: SA of Site Selection Methodology – Assessment Matrix (Information Sought from Applicants & Method of RAG Assessment)

	Sustainability	Comments
	Objective	
1	Biodiversity	Nature conservation is considered by the Sustainability Objectives and by the KCC Site Selection Methodology in terms of ensuring important elements of the resource are maintained and enhancements considered. The KCC methodology does not explicitly consider access to biodiversity. Assessment methodologies are compatible in looking at impacts on biodiversity. The SA Sustainability Objectives are more comprehensive in looking at access to biodiversity which can be provided in restoration plans.
2	Climate change	The SA Sustainability Objective explicitly looks at the impacts on climate change whereas the KCC site selection methodology does not, although in reality there will be limited scope for mineral sites to ameliorate impacts. Detailed analysis of climate change impacts are undertaken at planning application stage, where they are fully considered.
3	Community and well-being	PRoW's are considered in terms of access and long distance trails and public use and enjoyment in the KCC Site Selection Methodology. Opportunities for enhancement are sought. This is linked to sustainable transport modes. The SA Sustainability objectives consider sustainable communities including in relation to health and wellbeing. The appraisal has considered the impact on PRoWs as a component of this. Health and amenity are considered by the KCC Site Selection Methodology and the Sustainability Objectives. The approaches appear to be comparable. The KCC methodology considers impacts on air quality and proximity to AQMAs. Air quality is considered by the Sustainability Objectives categorised under the objective for community and wellbeing. Air quality is considered by both approaches in terms of acceptability and impacts on health and wellbeing.

4	Sustainable	The KCC methodology does not assess the contribution of sites to sustainable economic growth.
4	economic growth	
5	Flood risk	The KCC methodology considers proximity to flood zones and the impact on flood risk and seeks opportunities to reduce flood risk. The methodologies are compatible on flood risk management.
6	Land	Geodiversity is considered by the Sustainability Objectives and by the KCC Site Selection Methodology in terms of ensuring important elements of the resource are maintained and enhancements considered. Assessment methodologies are compatible in looking at impacts on geodiversity. Soil quality is considered in terms of agricultural land and sensitive soil sites in the KCC Site Selection Methodology. Agricultural land is considered by the Sustainability Objectives. This has been added into the SA appraisal objectives to ensure that this aspect is included in the appraisal.
		Greenbelt land is considered by the KCC Site Selection Methodology. It has not previously been explicitly included in the SA Sustainability Objectives. The consideration of impacts on green belt has been added to the SA Sustainability Objectives to ensure that this is covered by the appraisal.
7	Landscape and the historic environment	Landscape is considered by the KCC Site Selection Methodology in terms of impacts on AONBs and local landscapes, with reference to assessments and other landscape studies. The KCC approach corresponds with the scope of the SA Sustainability Objective in landscape terms. The KCC Site Selection Methodology considers the importance of retaining heritage sites and assets in terms of setting (landscape), amenity value and presence of assets, which is part of the sustainability objectives. The assessments are compatible.
		amenty value and presence of assets, which is part of the sustainability objectives. The assessments are compatible.

8	Transport	Transport is considered by the KCC Site Selection Methodology in terms of access to networks and impacts on them. The SA Sustainability objectives consider transport impacts, including the impacts on networks, the promotion of sustainable modes and minimisation of transport. The methodologies are compatible in terms of access and impacts, but the SA is more comprehensive in considering sustainable transport and minimising the need for transport. This is indirectly linked to climate change and air quality impacts as well as network impacts. The KCC methodology considers impacts on air quality and proximity to AQMAs. This is indirectly linked to the appraisal objective on transport which seeks to limit transport demand and promote sustainable modes.
9	Water	The KCC methodology considers impacts on groundwater and other water resources. It does not seek to promote sustainable water management, although the likelihood of mineral sites being able to contribute in a significant way to this objective is very small. Mineral operations may have impacts on the water environment through dewatering and this is considered more fully in the SA of sites. The methodologies are compatible on impacts on water quality and resources.

Appendix D: Detailed Findings and Recommendations of SA of Sites

Key:

Impacts	Probability of effects	Direct or indirect effects	Reversibility		
++ significant positive effect	L low probability	D direct effect	Y reversible effect		
+ some positive effect	M medium probability	I indirect effect	N not reversible i.e. permanent effect		
0 no effect	H high probability				
- some adverse effect					
significant adverse effect					
? uncertain effect					

Site M2: Lydd Quarry Extensions

	Sustainability	Comments											
	Objective												
		Short	Med	Long	Prob	Dir/Ind	Rev?						
					Н	D/I	N						
		Parcel 19 of the proposed allocation is within the Dungeness, Romney Marsh and Rye Bay Ramsar site and SPA/Ramsar											
		designated site. The site will have a direct impact upon the SPA (the one parcel) and likely indirect impacts on the wider SPA											
1	Biodiversity	and the Dungeness SAC and Dungeness, Romney Marsh and Rye Bay Ramsar Site. The whole site lies within the Dungeness,											
		Romney Marsh and Rye Bay SSSI and supports a range of nationally important plant and animal species. The biodiversity value											
		of the SSSI will be lost from the site.											
		Lydd Comm	Lydd Common and Pastures Local Wildlife Site (LWS) abuts part of the proposed allocation (to the south of parcel 23 Allens										
		Bank) and th	nere is the p	otential for a	adverse imp	acts on the s	ite from min	eral working. Ecological surveys should be undertaken					

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2

ameyconsulting

in accordance with KMWLP Policy DM 3 Ecological Impact Assessment that may require Appropriate Assessment in accordance with the Habitat Regulations, to determine the scale and nature of impacts and appropriate mitigation of impacts. This could include a buffer between areas worked and the adjacent LWS, along with planting to mitigate visual and noise disturbance. Parts of the proposed site support coastal priority habitats (parcels 16, 22 and 23). The site also contains hedgerows which could warrant status as a priority habitat if they contain greater than 80% native species but are not currently categorised as such. Hedgerows and areas of rough grassland on the site may contain suitable habitat for protected/notable species not associated with the designated sites. Records from the site and the wider area that are potentially relevant to this assessment include records of great crested newt, badger, common lizard, slow worm, grass snake, water vole and numerous bird records. The proximity of the site to Lydd Petty Sewer means that operations have the potential to adversely affected protected species recorded as being present in the water course. Potential impacts could arise from dust, noise, light, disturbance, direct land take and changes to the hydrology and water quality of the area. In accordance with KMWLP Policy DM 3 Ecological Impact Assessment any planning application must be accompanied by a full ecological assessment that may require Appropriate Assessment in accordance with the Habitat Regulations, including appropriate ecological surveys (in addition to those done to date in support of the promoted site that state further survey work is required to assess fully the ecological impacts and any possible mitigation) to assess the impact on the designated sites and protected/notable species. Sufficient mitigation should be provided to avoid adverse impacts (if achievable) in accordance with KMWLP Policies DM 2 Environmental and Landscape Sites of International, National and local Importance, Policy DM 3 Ecological Impact Assessment and DM 19 Restoration, Aftercare and After-use. Short Med Long Prob Dir/Ind Rev? 0 D Ν The site is proposed as an extension to existing operations, although no information is given on the phasing of the new Climate change workings in relation to the existing operations. If the site will be worked following completion of the existing workings, there will be no change to climate change impacts, provided there is no significant increase in HGV movements. If the site will be worked in parallel to the existing operations, there will be an increase in HGV movements and onsite processing which will have a negative impact on climate change, albeit small when considered in terms of the emissions in the county as a whole.

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		Short	Med	Long	Prob	Dir/Ind	Rev?					
		-	-	-/0	М	D	Y					
	Community and	workings paths by	s would the cor	be visibl	e from t n of tem	hese routes	without s bunds.	Cycle Route abut the southern boundary of two parcels of land and the appropriate mitigation. It is proposed to screen the workings from the Several public footpaths and bridleways are found in close proximity to the way No. HL27 through area 16 and footpath No. HL26 through area 19.				
3	well-being	Amenity, restoration	, diverte on to op e no AÇ	ed paths pen wate QMAs in p	must proper, the or	eserve the riginal routery to the site	connectives of the	with KMWLP policy XX. In accordance with KMWLP Policy DM 11 Health a vity of routes and made safe for all users, including equestrian users. Wit footpaths are likely to be lost. ver, residential areas lie adjacent to some parts of the site there is the				
		the impa	acts mus	st be inco	orporate	d into prop	osals for	m dust, noise, vibration, visual intrusion and light. Adequate mitigation of site operations in accordance with KMWLP Policy DM 11 Health and				
4	Sustainable economic	Short ++/-	Med ++/-	Long 0	Prob H	Dir/Ind D	Rev?					
	growth	The site would make a contribution to the supply of sharp sand and gravel as a material to support economic growth, although the use of non-renewable resources does not constitute the most sustainable route to growth.										
		Short	Med	Long	Prob	Dir/Ind	Rev?					
		?	?	?	L	D	N					
5	Flood risk	accompa	anied by	a site-s	pecific F		ssessmer	n KMWLP DM 10 water Environment, any planning application must be nt to demonstrate no adverse effect on flood risk and where practicable				
	Land	Short	Med	Long	Prob	Dir/Ind	Rev?					
6	Land											

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		The prop	The proposed site contains sensitive geomorphology which would be lost if the site is worked. The site is designated as a SSSI										
		for its ge	for its geomorphology and working of the site would remove the feature. It may be possible to use the extraction of the resource as a way of better understanding the feature, but the loss from the SSSI may reduce the capacity to understand the										
		resource											
	evolution of the SSSI in the future.												
		Short Med Long Prob Dir/Ind Rev?											
						•							
		0/?	0/?	0	M	D	N						
		The site	The site lies within a Local Landscape Area in policy CO5 saved from the Shepway District Local Plan (2006) under the Shepway										
		Core Stra	Core Strategy Local Plan (2013). The landscape of the Dungeness peninsula is flat and very open. Parts of Lydd are designated										
		as a Conservation Area (c.200m south-east) which also includes a number of Listed Buildings, the closest being The Grange											
	(Grade II) which is c.380m from Area 16. There are Listed Buildings located outside the Conservation Area and within the												
		village er	nvirons	at some	distance	e from the s	ite and	separated by areas of built form. Listed Buildings within c.250m of the site					
		include T	ourney	Hall (Gr	ade II) v	which is c.1	30m eas	t of area 21 and also within c.185m south of areas 18 and 20. There is a					
	Landscape and	Schedule	d Monu	ıment, aı	n aband	oned medie	val chur	ch and graveyard, Midley, which is c.1.8km north of area 17.					
7	the historic	It is proposed to screen operations from the paths and the town, including the nearby listed building, by temporary grassed											
	environment	bunds. N	No new	building	s are pro	posed to b	e constr	ucted. It is proposed to restore the site after operations have ceased to					
		mainly la	kes, ree	ed beds,	perman	ent pasture	and un	grazed margins. While this would not alter the openness of the landscape, it					
		would alt	ter the o	characte	r of the	immediate a	area, alt	hough the Landscape and Visual Impact Assessment assesses the long term					
		impacts a	as insigi	nificant.									
		In accord	dance w	ith KMW	LP DM !	Heritage A	ssets ar	ny planning application should demonstrate that the impacts on landscape					
		and on h	eritage	assets ir	n the vic	inity of the	propose	d development can be appropriately mitigated. A planning application must					
		provide f	urther i	nformati	on on th	ne impact th	at parc	el 23 Allens Bank could have on the listed building; Westbrook Farmhouse.					
		The area	has po	tential fo	or archa	eological va	lue and,	in accordance with KMWLP DM 6 Historic Environment Assessment any					
		planning	applica	tion sho	uld be a	ccompanied	by an a	ssessment of the archaeological value of the site and a proposed plan for					
		preservin	ng rema	ins in sit	u where	possible or	removii	ng and conserving remains offsite.					

		Short	Med	Long	Prob	Dir/Ind	Rev?	
	Transport	?	?	0	М	D	Y	
8		this is m	aintaine on. Pro	d over t	ne life o	f the site, t	nen the pare exha	uld be no more than 250 HGV movements a day (125 in and 125 out). If proposal will not generate extra vehicle movements than the previous usted before the proposed area is developed this rate of HGV generation in would require to be conditioned to 250 HGV movements a day (125 in /
				•	•			al extraction is acceptable for Allens Bank (parcel 23).
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		-	-	-	М	D	N	
9	Water	operation into drain demonst manager levels. Sewerag 8 any pla and the standard motation application	ns will in nage charate no ment of e infrastanning attreatment is within that coron for d	annels. adverse the wate tructure application the See vers the epth of e	ewatering In accordance effect of er environ crosses on must s will ren condary whole s excavation	the site, ar be accompnain operat Aquifer & Cite. However, de-war	the pote KMWLP rels and vensure the and a wast anied by ional. Groundwater, relevatering of	the potential for impacts on water quality and any sensitive habitats. If intial to lower ground and surface water levels and introduce saline water Policy DM 10 water Environment any planning application must water quality. Operations should be conducted appropriate for the ere are no adverse impacts with a particular emphasis on salinity and water ewater treatment works is adjacent. In accordance with KMWLP Policy DM adequate proposals to show the sewerage infrastructure can be diverted exter Vulnerability Zone notation for the area and the Minor Aquifer High ant planning conditional controls could be imposed on any specific extraction cells, pollution control methods and ways of working to safeguard ensitive habitats.

Site M3: Chapel Farm

	Sustainability	Comments										
	Objective											
		Short	Med	Long	Prob	Dir/Ind	Rev?					
		-	-	?	М	D	N					
1	Biodiversity	ensure the and/or depriority in within the ecological The restormand Eull Heat adverse in provided The propand 2.5k	nat the ust supplementation is wood all survey bration is the Pit Local impacts to protect on the protect of th	ancient of pression are adjated and, here we consider the learning and the sectively).	woodlan are like cent to dgerow submitte should c n Park L life Site e wildlife WSs. ent is in Given t	d area will in the site. Do and water the distance within are demonstrated is also adjate sites, including the distance will be distance.	not be suired. ue to the podies (gony planning that it is each, situading three o two situading the from the podies of the situading the situa	mediately adjacent to the access route and therefore the proposal must ubject to any negative impact upon this protected habitat. Therefore a buffer potential for ground nesting breeding birds and protected/notable species reat crested newts, reptiles, bats and breeding birds) there will be a need for ng application to demonstrate that the impacts can be appropriately mitigated. In increasing the area of suitable habitat for biodiversity. In adjacent to the proposed site, immediately to the south of Lenham Heath Road. In its latest that the east of Bull Hill. Proposals must be assessed for any potential ough disturbance caused by noise and traffic. Appropriate mitigation should be seen that have been designated as SSSI, Lenham Quarry and Hart Hill (at 800m te proposed workings, adverse effects are unlikely.				
		Short	Med -	Long 0	Prob H	Dir/Ind D	Rev?					
2	Climate change		is a nov					a to existing workings and therefore will add to emissions from HCV movements				
								n to existing workings and therefore will add to emissions from HGV movements				
								ill have a negative impact on climate change, albeit small when considered in				
		terms or	uie em	ISSIONS II	i trie co	unty as a w	noie.					

		Short	Med	Long	Prob	Dir/Ind	Rev?	
		-	-	0	Н	D	Υ	
3	Community and well-being	require colonger and necessar near to to the site	liversion I less of y buffer he site i is rural	to mair convenie s should require s and rem	ntain the ent. App	e connectivit propriate scr vided to ens g from visua n any signifi	cy of foot reening s sure safe al impact icant are	Stour Valley Walk, and will be affected by the proposed workings. These will the paths in the area and the safety of users of the paths although routes will be should be provided to mitigate the visual impacts to users of the paths, and if the ty. Dust and noise suppression should be employed. Residential properties is with appropriate planting. In a of residential development or AQMAs. There are a small number of individual the ending Lenham Heath Road, to the north of the Lenham Heath Road and
		risk from achievab developn accompa	HGV er le and s nent de nied by	missions should b pending a Trans	. Mitiga e demor on the t port Ass	tion against estrated in a cype and nu	any pot any planr mber of nich asse	rth east. These are at risk of impacts from dust and to a lesser extent health cential adverse impacts from quarry operations are considered to be fully ning application. However, the Maidstone AQMA could be a constraint to HGVs that may travel through it. A planning application should be esses the scale of impact on the AQMA. A routeing strategy is unlikely to be
	Sustainable	Short	Med	Long	Prob	Dir/Ind	Rev?	
4	economic	++/-	++/-	0	Н	D	N	
	growth						,	soft sand as a material to support economic growth, although the use of non- owth than using recycled aggregate.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		0	0	0	М	D	N	
5	Flood risk	accompa	nied by	a site-s	pecific F		ssessmer	any planning application for an area greater than 1 hectare must be nt to demonstrate no adverse effect on flood risk and where practicable

		Short	Med	Long	Prob	Dir/Ind	Rev?				
		-	-	?	Н	D	N				
6	Land	Agricultu	iral Land	d Classifi	cation m	naps produc	ed by Na	atural England show the land at the site to be grade 2 agricultural land. If the			
		site is wo	orked th	is will be	e lost fo	r the duration	on of the	works. The restoration of the site would be required to be sensitive to the			
		agricultu	ral after	ruse of t	he site ii	n accordanc	e with P	olicy DM 19 restoration, Aftercare and After-use.			
		Short	Med	Long	Prob	Dir/Ind	Rev?				
		-/?	-/?	?	М	D	N				
		The site	lies with	nin the s	etting of	the Kent D	owns AC	ONB. The site and the proposed haul route is particularly prominent from the			
		AONB to	the nor	th, inclu	ding fro	m an extens	sive trac	t of the North Downs Way national trail and other public rights of way and			
		roads to	the nor	th of the	2 A20. T	he site is a	n area of	f open landscape rising from Lenham Heath Road towards the A20. Although it			
		is well so	creened	from Le	nham H	eath Road t	o the so	uth by dense hedges and trees, the other boundaries are in open farmland and			
		this shou	ıld requ	ire scree	ning. T	he presence	e of mine	erals extraction within a hitherto unaffected site would be very likely to have an			
		adverse effect upon landscape character locally due to loss of field boundaries; removal of vegetation cover; change in landform;									
	Landscape and	the intro	duction	of plant	and equ	uipment and	the res	ultant change to the visual context of the landscape. Potential visibility from			
7	the historic	the high	er land v	within th	e AONB	to the nort	h could a	also have indirect effects on character in that area. The Landscape and Visual			
	environment	Impact A	Assessm	ent of th	e propo	sed site cor	ncludes t	hat visual effects on local receptors would be significant but that visual impacts			
		on the A	ONB wo	uld not	be signit	ficant.					
		There ar	e listed	properti	es close	to the site,	includin	g the Grade II* Royton Manor, together with important archaeological remains			
		of Royto	n Chape	el which	is Grade	II listed, a	nd other	Grade II listed properties of Chapel Mill, and Mount Castle Farm to the north.			
		To the so	outh is t	he histo	ric Park	& Garden o	f Chilsto	n Manor which is Grade I listed, but this is cut off from Lenham Heath Road			
		and the	site by t	he M20	and HS1	l railway. T	he settir	ng of these assets may be adversely affected by mineral operations, although a			
		Cultural	Heritage	e Apprais	sal in Ma	arch 2018 co	oncluded	no significant adverse effects are likely. Any planning application must			
		demonst	rate no	adverse	impacts	on these a	ssets in	accordance with Policy DM 5 Heritage Assets.			
		The Lent	nam Cor	nservatio	n Area i	is remote fr	om the s	site and local topography means the proposals should have little impact on it.			

		Short	Med	Long	Prob	Dir/Ind	Rev?							
				0			N.I							
		?	?	0	М	D	N							
		It is proposed to construct a new junction on the A20 to access the site. A haul route will need to be constructed that can												
8	Transport	accommodate the necessary vehicle movements. It is proposed to work the site following completion of the nearby Lenham Quarry												
	Transport	and that	HGV m	ovement	s will be	no greater	than ex	isting. A planning application should be accompanied by a transport						
		assessme	ent that	demons	strates th	ne road net	work car	accommodate the required vehicle movements safely and without detriment to						
		the netw	ork, pai	ticularly	conside	ring cumula	ative imp	acts with proposed housing growth in the Lenham area in the Maidstone						
		Borough	Local P	lan in ac	cordanc	e with Polic	y DM 13	Transportation of Minerals and Waste.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		Shore	i icu	Long		,								
		-	-	-	М	D	N							
				I		I.								
		This site overlies the Folkestone Sands aquifer and is partly in a Source Protection Zone 3 for a public water abstraction borehole.												
		Adverse impacts from mineral operations are not expected.												
		Sewerage infrastructure crosses the site, and a wastewater treatment works is adjacent. Any planning application must be												
9	Water	accompanied by adequate proposals to show the sewerage infrastructure can be diverted and the treatment works will remain												
		operational.												
				a a langi	-h of +ho	Divor Ctou	r at Lanh	and adverse impacts from discharge, diversion of the watercourse or						
			•	-				nam and adverse impacts from discharge, diversion of the watercourse or						
			_			•		lanning application must demonstrate that there will be no adverse impacts on						
		the river	and the	hydrau	lic integ	rity of the ri	iver, its t	ributaries and aquifers will not be compromised in accordance with Policy DM						
		10 Wate	r Resou	rces.										

Site M7: Central Road

	Sustainability Objective	Commen	omments											
		Short	Med	Long	Prob	Dir/Ind	Rev?							
					М	D	N							
		The site is a grazing marsh, a priority habitat and a habitat of principal importance under the Natural Environment												
		and Rural Communities Act. It currently supports a wide range of flora and fauna, including a number of rare plant												
		species, important wintering and breeding bird populations and the most important water vole populations in the												
1	Biodiversity			•			•	ce for its aquatic macroinvertebrate assemblages and water vole						
		populations. The development will result in the loss of this priority habitat and it is unlikely to be possible to recreate												
		it, either elsewhere or on restoration. Development is also likely to have indirect impacts on the adjacent coastal												
		saltmarsh and deciduous woodland priority habitats.												
		The site overlaps Dartford Marshes Local Wildlife Site. Extraction should avoid this part of the site and any planning												
		1	application should be accompanied by an assessment of the likely impacts on the LWS and appropriate mitigation to ensure no significant adverse effects on the site.											
		ensure n	o signifi	icant adv	erse eff	ects on the	site.							
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		-	-	0	Н	D	N							
2	Climate change	The site	is a nev	v site rat	her than	n a phased o	extensio	n to existing workings and therefore will add to emissions from						
		HGV mov	ements	and oth	ner site t	raffic and o	n-site pr	ocessing. This will have a negative impact on climate change,						
		albeit sm	all whe	n consid	ered in	terms of the	e emissio	ns in the county as a whole.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
3	Community and well-	-	-	0	Н	D	Υ							
	being	A large r	umber	of reside	ential pro	perties are	located	in close proximity to the site, including three and four-storey						
		_						ly to be available from these properties, and from the public						
								·						

		rights of way that run around the eastern and western boundaries of the site. It is unlikely that the adverse effects												
		from such change in view could be adequately mitigated against, due to the height of property windows and the lower level of the site than the surrounding land.												
		Extraction activity could be constrained by existing residential receptors on Wellcome Avenue (east) and Riverside Walk (west) which are sensitive to deposited dust and potentially noise, vibration, light and visual impacts. Mitigation should be employed in the form of dust suppression and appropriate bunds or planting in accordance with Policy DM 11 Health and Amenity.												
		The bridleway to the east of the site and public footpath DB1 to the west should be retained for use with appropriate safety measures and screening. It is unlikely that views into the site from the paths and nearby residential properties can be mitigated.												
		The promoted site area is part of the Dartford Borough Open Space (Policy CS14 and DP24) and is part of the strategic development site local plan designation. The intention is to retain the site as an area of undeveloped land within the overall strategic development designation. There will be a loss of this open space in the short and medium term, to be restored in the long term.												
		There are three AQMAs in the vicinity of the site and air quality could be further reduced in these areas, either from site traffic or from other traffic trying to avoid congestion. An access and routeing plan should be developed to allow site traffic to avoid the AQMAs to reduce the risk of adverse health impacts, and a planning application should be accompanied by a detailed air quality assessment to demonstrate that the development can be accommodated on the road network without significant adverse effects on air quality to satisfy policy DM Health and Amenity.												
		Short Med Long Prob Dir/Ind Rev?												
4	Sustainable economic growth	The site would make a contribution to the supply of sharp sand and gravel as a material to support economic growth, although the use of non-renewable resources is a less sustainable route to growth than using recycled aggregate.												
		The site is identified in the Dartford Local Plan as part the Northern Gateway Strategic Site (Policy CS3). The promoted site area is also part of the Borough Open Space (Policy CS14 and DP24) that is part of the strategic												

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		developn	nent site	e local p	olan des	signatio	n. The i	intent	ion is t	to retain the site as an area of undeveloped land within the					
			overall strategic development designation therefore the site would contribute to economic activity in the short and medium term and would not affect it in the long term. Short Med Long Prob Dir/Ind Rev?												
		medium													
		Short	Med	Long	Prob	Dir/I	nd R	lev?							
		?	?	?	L	D)	N							
		The site lies in flood zone 3. Any planning application must be accompanied by a site-specific Flood Risk Assessment													
5	Flood risk	to demonstrate no adverse effect on flood risk and where practicable contribute to an overall reduction in flood risk.													
		The floor	d defend	es on th	ne edge	of the	site sho	uld be	e retair	ned and access allowed for maintenance. A planning					
		application	on must	demon	strate th	nat the	propose	ed ope	rations	s will not compromise the flood defences in accordance					
		with Poli	cy DM 1	0 Water	Enviro	nment.									
		Short	Med	Long	Prob	Dir/Iı	nd R	lev?							
6	Land	-	-	-	Н	D)	N							
	Land	Agricultu	ral Land	l Classifi	cation r	naps pr	oduced	by Na	atural E	England show the land at the site to be grade 2 and 3					
		agricultu	ral land	. If the	site is v	vorked	this will	be los	st if res	storation is proposed to be to wetland habitat.					
		Short	Med	Long	Prob	Dir/I	nd R	lev?							
		?	?	0	М	D)	N							
7	Landscape and the	The site	lies with	in the D	l Dartford	Marshe	es Area d	of Arc	haeolo	ogical Potential and a desk-based assessment has identified					
'	historic environment	that the	site has	high are	chaeolo	gical po	tential.	Extra	action o	operations are likely to result in damage, disturbance or					
		destructi	on. Any	/ plannir	ng appli	cation r	nust be	accor	npanie	ed by an assessment of the archaeological value of the site					
		and a pro	ogramm	e of inv	estigatio	on prior	to any	extrac	ction ta	aking place.					
		Short	Med	I	Long	Prob	Dir/Ind	d F	Rev?						
8	Transport		-	-	0	Н	D		N						
		The locat	ion is a	strateg	ically im	portant	t part of	the n	ationa	I road network. The County Council considers that even					
		modest t	raffic in	crease v	vill have	e potent	tially size	eable	impact	ts on traffic conditions, particularly when viewed					

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		cumulati	vely wit	h other p	planned	developme	nt in the	Dartford Local Plan. The A282 frequently suffers major							
		congestio	congestion which affects junction 1A interchange of the A282 and A206 (Bob Dunn Way) that then forms the												
		approach	approach to the Strategic Route Network (M25). Any planning application must be accompanied by a Transport												
		Assessm	ent that	assesse	s the hi	ghway impa	acts of th	e proposed development and demonstrates that the road							
		network	will not	be adve	rsely aff	ected by th	e develo	pment when considered in the context of other proposed							
		development in the area to satisfy Policy DM 13 Transportation of Minerals and Waste.													
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	-	М	D	N								
		The site	overlies	a chalk	aquifer	and is in SF	Z2 for a	public water abstraction borehole. A planning application must							
9	Water	demonst	rate tha	t excava	ntions wi	ll not affect	the aqu	ifer or its water quality and appropriate pollution control							
		measures should be employed to satisfy Policy DM 10 Water Environment. The site is bounded in the west by the River Darent. A planning application must be accompanied by evidence to demonstrate that the hydrology and water													
		quality of the river will not be affected by mineral extraction operations or restoration plans.													

Site M8: West Malling Sandpit

	Sustainability	Commer	nts					
	Objective							
		Short	Med	Long	Prob	Dir/Ind	Rev?	
					М	D	N	
1	Biodiversity		sess the					e must be avoided as it is an irreplaceable habitat. The planning application woodland, including through hydrological impacts, and provide mitigation to

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		The site	contains	acid gr	assland	priority hab	itat that	is very rare in Kent. Aerial photos indicate that the site is surrounded by					
		mature h	edgero	ws and t	here are	e hedgerows	s/mature	e trees within the site. Deciduous woodland priority habitat is located within the					
		site. The	acid gı	assland	and veg	getation witl	hin the s	ite will be lost. There is the potential for a number of species to be present,					
	s and breeding birds. Any planning application must include ecological surveys												
		have on protected/notable species and habitats. A restoration scheme must											
demonstrate that the completed site is replacing any habitat of ecological interest and enhancing the ecological													
		overall.											
		The site	is withir	the imp	oact risk	zone for Tr	ottiscliff	e Meadows SSSI which could be affected by changes to the hydrological					
		regime.	Any pla	nning ap	plicatio	n must be a	ccompai	nied by evidence to show that the hydrology of the SSSI will not be affected.					
		The site	is appro	ximately	/ 3km fr	om North D	owns Wo	oodlands SAC and 6km from Peters Pit SAC. The Habitats Regulations					
		Assessme	ent has	conclud	ed that t	there are no	t likely t	to be significant adverse effects on these sites.					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
	Climate change	-	-	0	Н	D	N						
2		The site	is a new	site rat	her thar	n a phased o	extensio	n to existing workings and therefore will add to emissions from HGV					
		moveme	nts and	other si	te traffic	and on-site	e process	sing. This will have a negative impact on climate change, albeit small when					
		considere	ed in ter	ms of th	ne emiss	ions in the	county a	s a whole.					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		-	-	0	Н	D	Υ						
		Two foot	paths c	oss the	site pro	viding acces	s to the	AONB to the north. These footpaths should be diverted such that connectivity					
3	Community and	of the pa	ths is m	aintaine	d with a	appropriate	screenin	g and safety measures.					
	well-being	Extractio	n activit	y could	be const	trained by e	xisting r	eceptors near to the site (residential, golf course, church) which are sensitive					
		to depos	ited dus	t and po	tentially	noise, vibr	ation an	d visual impacts. Appropriate mitigation should be employed, potentially in the					
		form of c	lust sup	pression	and ap	propriate bu	unds or p	planting, and with some stand-off from properties. Any planning application					
		should be	e accom	panied	by an as	sessment o	f the pot	tential impacts on air quality, including from vehicle emissions to satisfy Policy					
	<u> </u>			-				· · · · · · · · · · · · · · · · · · ·					

	DM 11 H	ealth ar	nd Amen	ity. The	ere may be	views of	the site from paths near the site and from residential roads and properties. A								
	landscape and visual assessment has been undertaken which concludes that the proposed development would have signifingly localised landscape and visual effects.														
	highly lo	calised I	andscap	e and vi	sual effects										
	Roughett	ts road i	is used l	y eques	strians and a	an increa	ase in HGV movements is likely to increase safety risks which needs to be								
	mitigated	gated, for example by allowing riders to use other paths in the area to avoid contact with vehicles.													
	There is	There is the potential for health impacts from inhaled silica dust. However, Public Health England advises that at sites which are													
	well-managed and well-regulated and have appropriate control measures in place, concentrations of dust off-site remain below														
those associated with health impacts. Any planning application must be accompanied by information which demonstra															
	dust will	dust will be controlled to acceptable levels.													
Short Med Long Prob Dir/Ind Rev?															
Sustainable	++/- ++/- 0 H D N														
economic	The site	would n	nake a c	ontribut	ion to the s	upply of	soft sand (together with some non-aggregate industrial silica sand) as a								
growth	material to support economic growth, although the use of non-renewable resources is a less sustainable route to growth than														
	using red	cycled m	naterials												
	Short	Med	Long	Prob	Dir/Ind	Rev?									
	?	?	?	L	D	N									
Flood risk	The Envi	ronmen	t Agency	y flood r	nap shows t	he site t	to be located outside of flood risk areas, but this is believed to be incorrect and								
rioca rioit	that the	site is v	ulnerabl	e to floo	ding and lie	s in floo	d zone 2 or 3. Any planning application must be accompanied by a site-								
	specific F	lood Ris	sk Asses	sment t	o demonstra	ate no a	dverse effect on flood risk and where practicable contribute to an overall								
	reduction	n in floo	d risk.												
	Short	Med	Long	Prob	Dir/Ind	Rev?									
Land	-/?	-/?	-/0	М	D	N									
	Agricultu	ral Land	Classifi	cation n	naps produc	ed by N	atural England show the land at the site to be grade 2 and 3 agricultural land.								
	If the site	e is wor	ked this	will be	temporarily	lost. Re	estoration to agricultural land should be to the best and most versatile grade.								
	economic	landscap highly lock Roughett mitigated There is well-man those ass dust will Short ++/- economic growth The site material using red Short ? Flood risk The Envi that the specific F reduction Short -/? Agricultur Agricultur	Iandscape and v highly localised I Roughetts road in mitigated, for extending the mitigated and those associated dust will be controlled the mitigated and those associated and those associate	landscape and visual assinghly localised landscape. Roughetts road is used it mitigated, for example by the potential for well-managed and well-it those associated with he dust will be controlled to the seconomic growth. Short Med Long ++/- ++/- 0 The site would make a composite with material to support economic using recycled materials. Short Med Long ? ? ? The Environment Agency that the site is vulnerably specific Flood Risk Assessmeduction in flood risk. Short Med Long ? ? The Environment Agency that the site is vulnerably specific Flood Risk Assessmeduction in flood risk. Short Med Long ? ? -/? -/0 Agricultural Land Classification.	landscape and visual assessment highly localised landscape and visual assessment highly localised landscape and visual assessment highly localised landscape and visual assessment with landscape and visual assessment in the potential for health well-managed and well-regulated those associated with health imputed will be controlled to accept a sustainable economic and the site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed material to support economic growth are site would make a contributed with the site would make a contributed material to support economic growth are site would make a contributed with the site would make a contributed w	landscape and visual assessment has been using localised landscape and visual effects. Roughetts road is used by equestrians and a mitigated, for example by allowing riders to There is the potential for health impacts from well-managed and well-regulated and have those associated with health impacts. Any product will be controlled to acceptable levels. Short Med Long Prob Dir/Ind ++/- ++/- 0 H D The site would make a contribution to the standard to support economic growth, althous using recycled materials. Short Med Long Prob Dir/Ind ? ? ? L D The Environment Agency flood map shows that the site is vulnerable to flooding and lies specific Flood Risk Assessment to demonstrate reduction in flood risk. Short Med Long Prob Dir/Ind Pro	landscape and visual assessment has been undertal highly localised landscape and visual effects. Roughetts road is used by equestrians and an increamitigated, for example by allowing riders to use oth There is the potential for health impacts from inhale well-managed and well-regulated and have approprious those associated with health impacts. Any planning dust will be controlled to acceptable levels. Sustainable economic growth The site would make a contribution to the supply of material to support economic growth, although the using recycled materials. Short Med Long Prob Dir/Ind Rev? ? ? L D N The Environment Agency flood map shows the site of that the site is vulnerable to flooding and lies in flood specific Flood Risk Assessment to demonstrate no a reduction in flood risk. Short Med Long Prob Dir/Ind Rev? -/? -/? -/0 M D N Agricultural Land Classification maps produced by N								

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		The site	is withir	n the Me	tropolita	an Green Be	elt. A pla	nning application must provide evidence on the impact of operations on the						
		Green Be	elt and j	justify w	hy these	do not cor	nstitute in	appropriate development or constitute very special circumstances.						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		-/?	-/?	?	М	D	Y/N							
				•	-			bundary of the AONB and therefore within its setting. There may be views of						
7	Landscape and the historic environment	the site from paths near the site and from residential roads and properties. A landscape and visual assessment has been undertaken which concludes that the proposed development would have significant highly localised landscape and visual effects that would not impact on the integrity of the surrounding landscape character and the proposed mitigation measures would considerably reduce potential visual effects. The assessment concludes that the proposed development would not be visible from the wider setting. With regards to restoration, it will be essential to ensure that views from the north are in keeping with the surrounding landscape												
		Street as demonst	is near well as rate no lies with	adverse adverse nin an ai presend	tone on effects ea of ar	the corner on these hi	of Rough storic ass al importa	and to a scheduled monument and there are listed buildings nearby in East letts Road and London Road. Any planning application should be required to sets. Ince and a desk and field assessment should be undertaken to assess the the site and a programme of excavation agreed and carried out before						
		Short	Med	Long	Prob	Dir/Ind	Rev?							
		?	?	0/?	М	D	Y/N							
8	Transport	Assessm Excavation	ent has ons cou	been ur ld affect	ndertake the drai	n which cor inage, land	ncludes to or struct	adverse impacts on the local highway network, although a Transport hat the network has sufficient capacity and access can be provided. ure of the M20 at the northern edge of the site. Any planning application must sesses the highway impacts of the proposed development and demonstrates						

		that the	road ne	twork w	ill not be	e adversely	affected	by the development either through additional HGV movements or through
		structura	al dama	ge, and	that acc	ess can be	safely ac	commodated.
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		-	-	-	М	D	N	
9	Water	the site of	could ha	ave adve	rse impa	acts on the ect the hyd	source p	ource protection zone 3 for public water abstraction boreholes. Development of rotection zone. A planning application must demonstrate that operations and ical environment and that the aquifers (including the integrity of the Sandgate dwaters and the Leybourne Stream to the south of the site will not be affected.

Site M10: Moat Farm

	Sustainability	Commen	its					
	Objective							
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		?/-	?/-	?	М	D	N	
1	Biodiversity	Being pr	edomina	antly ara	ble field	s surrounde	ed by hed	lgerows and ditches, the site has the potential to support breeding and/or
	,	wintering	g birds,	reptiles,	great cr	ested newt	s and wa	ter voles. The area of ancient woodland to the north of the site requires
		an appro	priate b	ouffer. A	ny plan	ning applica	ation sho	uld be accompanied by evidence to demonstrate that appropriate
		mitigatio	n can b	e implen	nented t	o avoid adv	erse imp	acts on protected/notable species and the ancient woodland.
2	Climate change	Short	Med	Long	Prob	Dir/Ind	Rev?	

		0	0	0	Н	D	N								
								rations, with phasing to work this and the proposed Stonecastle Farm site concurrently and with an extraction rate of 120,000 tonnes per annum as							
		that which exists at the existing Stonecastle Farm Quarry site. The climate change impacts from HGVs and other vehicles accessing the site and on-site processing are likely to be unchanged from current emission levels.													
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	?/0	Н	D	Υ								
		Footpath	is cross	the site	which w	ill be divert	ed durin	g operations and possibly permanently. These footpaths should be							
		diverted	diverted such that connectivity of the paths and safety is maintained.												
		The nearest residential building is at Moat Farm and is approximately 170m from the site and which may be sensitive to													
3	Community and	deposite	deposited dust and potentially noise, vibration and visual impacts. Any planning application should assess the potential impacts on residential buildings and appropriate mitigation should be employed.												
	well-being	impacts	on resid	lential bu	uildings	and approp	riate miti	gation should be employed.							
		A Landso	A Landscape Assessment undertaken in 2001 concluded that the visual impact of operations will be limited to adjacent												
		footpaths. These impacts must be mitigated by planting and use of bunds around the perimeter of the working. A second													
		assessment of landscape and visual impact was undertaken in 2018 which concluded that effects on landscape character are													
		unlikely t	to be sig	gnificant	other th	nan on path	s in the i	mmediate vicinity and within the site itself. Views of the site are likely to							
		be seen	from res	sidential	propert	ies although	screeni	ng is possible and should avoid significant impacts.							
	Custoinable	Short	Med	Long	Prob	Dir/Ind	Rev?								
4	Sustainable economic	++/-	++/-	0	Н	D	N								
	growth	The site	would n	nake a c	ontribut	ion to the s	upply of	sharp sand and gravel as a material to support economic growth, although							
	, <u>, , , , , , , , , , , , , , , , , , </u>	the use of	of non-r	enewabl	le resour	ces is a les	s sustain	able route to growth than using recycled aggregate.							
_	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?								
5	FIOOU FISK	?	?	?	L	D	N								
				<u> </u>		1									

		The site lies in flood zone 3. Any planning application must be accompanied by a site-specific Flood Risk Assessment to demonstrate no adverse effect on flood risk and where practicable contribute to an overall reduction in flood risk.
6	Land	Short Med Long Prob Dir/Ind Rev? ? ? M D N/Y Agricultural Land Classification maps produced by Natural England show the land at the site to be grade 3 agricultural land. A survey in 1998 found the land to be grade 3b. If the site is worked this will be lost, although grade 3b land is not considered to be in the category of best and most versatile. Restoration is to wetland habitat. The site is within the Metropolitan Green Belt. Any planning application would be required to provide evidence of the impact of operations on Green Belt objectives and the tests of what constitutes appropriate development in the Green Belt and justify why the proposed development would not constitute inappropriate development and if so that there are very special circumstances that justify the acceptability of the development.
7	Landscape and the historic environment	Short Med Long Prob Dir/Ind Rev? -/? -/? 0 M D Y/N A Landscape Assessment undertaken in 2001 concluded that the visual impact of operations will be limited to adjacent footpaths. A second assessment of landscape and visual impact was undertaken in 2018 which concluded that effects on landscape character are unlikely to be significant other than on paths in the immediate vicinity and within the site itself. There is evidence of medieval activity outside the site to the north and west, but none within the site itself. A grade II listed building is immediately south of the site and another at Stonecastle Farm, but the listings reference the fabric of the building and not the setting, therefore significant impacts on the assets are not likely. Any planning application must be accompanied by an assessment of heritage assets in the vicinity of the site and demonstrate no significant adverse effects on the assets, particularly from vehicles accessing the site.
8	Transport	Short Med Long Prob Dir/Ind Rev? 0 0 0 H D Y

_													
		It is unde	erstood	that acc	ess to t	he site will b	oe via the	e existing purpose built access currently serving Stonecastle Farm Quarry					
		onto the	A228 to	the eas	st of the	site. There	e is the p	octential for the proposed site to create adverse impacts on the local					
		e required. However, a Transport Statement has been produced for											
		Stonecastle Farm which has concluded that subject to some minor repairs and routine maintenance, the existing access to the											
		sites is acceptable to accommodate the permitted and proposed operations at Stonecastle Farm Quarry, assuming the sites											
		sequentially at the same 120,000 tonnes per annum as the existing											
Stonecastle Farm Quarry site. It also concluded that the junction with the A228 was acceptable and the denoter not result in an unacceptable impact on the road network or safety. Phasing of the works with the existing													
											ensure that no additional HGV movements are created on the road network.		
				I .		T =	T = =	1					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		-	-	-	М	D	N						
		The site	overlies	an aqui	fer and	lies partially	within g	groundwater source protection zone 3 for a public water borehole. The					
9	Water	Alder Str	eam an	d smalle	r ditche	s run throug	gh the sit	te. There is the potential for negative impacts on the aquifer, stream and					
	Trace.	ditches.	Any pla	nning a	pplicatio	n must be a	accompai	nied by a detailed assessment of the hydrological environment and the					
		impacts	of mine	ral worki	ng on it	. This shou	ıld includ	e an assessment of the relationship to the previous, now flooded,					
		excavation	ons and	should o	demons	trate how th	ne restora	ation to wetland will preserve the integrity and function of the Alder					
		Stroam a	nd drai	dit	-hn	4la a:4a							
		Su cam a	iiiu uraii	nage uiu	ches on	the site.							

Site M11: Joyce Green Quarry

	Sustainability Obje	Commen	ts				
1	Biodiversity	Short	Med	Long	Prob	Dir/Ind	Rev?
	,	0			Н	D	N

2

3

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The site is important for a number of protected/notable species (water vole, ditch vegetation, aquatic invertebrates, bats, reptiles, breeding and wintering birds). It is proposed to retain the overall pattern of ditches though there will be loss of some of the ditches during operations. Ditches would be re-created as part of the proposed mineral extraction and restoration activities but overall there will be a net loss of ditches. Therefore, species/populations could be significantly affected during this loss and recreation of habitat process. Any biodiversity gain is unlikely to be a significant benefit for species affected by the temporary habitat losses and overall disturbance potential prior to eventual restoration. The ecologically sensitive restoration proposed leaves doubt that it can be implemented with a high probability of success, in part because the nature of the imported material to create habitats is unknown in terms of the impact on the hydrology of the site and thus potential changes to the habitat of the drainage ditches. The site falls into the Impact Risk Zone (IRZ) Goose & Swan Functional Land for the nearby Inner Thames Marsh and Purfleet Chalk Farm SSSIs and Important Bird Areas Thames Estuary And Marshes (designated by Birdlife International). The site also forms Green Corridor No 12 of Bexley's 14 Designated Strategic Green Corridors "River Darent corridor" of which Dartford Marshes is a part. The site lies in a Biodiversity Opportunity Area where Dartford's Development Plan policies require particular focus to be given to enhancing biodiversity. The site contains two priority habitats: coastal floodplain and grazing marsh; and hedgerows. In addition, the grassland has an affinity with other grassland priority habitats. The proposed site forms part of the Dartford Marshes Local Wildlife Site which is expected to be lost during the operations. All of these biodiversity assets are likely to be significantly negatively affected by the proposed operations and habitats will be lost. Restoration is proposed to be progressive with extraction and to be ecologically sensitive to incur no net loss of habitat overall. However, there is doubt that the proposed restoration plan is implementable to achieve the habitat reinstatement objective and therefore there is no certainty that negative impacts can be fully mitigated. Med Prob Dir/Ind Rev? Short Long 0 Н D Ν The site is proposed as a phased extension to existing operations once the existing permitted reserves have been extracted and processed for market, although the number of vehicle movements is expected to double. The climate change impacts from HGVs and other vehicles accessing the site and on-site processing are likely to increase. Short Med Long Prob Dir/Ind Rev?

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Climate change

0	-	0	H/L	D	Y/N

Footpaths run along the site boundary to the west, east and southwest of the site, including the Darent Valley Path, the London Loop and the Thames Path, promoted as recreational paths. The Darent Valley Footpath runs along the top of the flood embankment to the west of the site. Users of these paths will see the site across the large open landscape. Screening will be provided but the site will still be visible from the path on the embankment, although the proposed development will not divert the paths. Users of roads in the vicinity may have glimpsed or distant views of the site and residents in Oaks Road to the west may see the site from upper windows. Mitigation should be provided in the form of retained and enhanced vegetation and bunds which will minimise most impacts, although not for users of the path along the raised earth banks which could potentially be significant and adverse impacts for those users.

Community and well-being

The site is designated as Borough Open Space in the Dartford Development Policies Plan 2017. This open space will be lost in the medium term with a loss of amenity, but restoration will be to open space therefore in the long term the effect will be neutral.

There are residential dwellings to the east, at least 450m from the proposed extension, and to the west at least 650m from the proposed extension. An assessment of the expected noise levels has indicated very low levels of noise for these receptors. At this distance, properties are unlikely to be affected by dust. There are a small number of properties on Joyce Green Lane which could potentially experience adverse amenity effects from vehicles accessing the site.

The proposed site is located near to four AQMAs (Dartford 1, 2 and 3 an AQMA in Bexley) and operations at the site have the potential to further reduce air quality in these AQMAs due to vehicle exhaust emissions. There is the potential for air quality impacts as a result of vehicle exhaust emissions and dust emissions which could create both amenity and health effects. Any planning application must be accompanied by a detailed assessment of air quality impacts which demonstrates no significant adverse effects from dust and vehicle exhaust emissions. Mitigation will be required to reduce the level of these emissions. Vehicles accessing and leaving the site would use the A206 either east or west of Joyce Green Lane. If vehicles travel to or from the west, they will pass through Dartford AQMA 3 and possibly also the Bexley AQMA. Travelling to and from the east, they are likely to pass through Dartford AQMA 1 and/or Dartford AQMA2. However, it is understood that the site is proposed as a phased extension to existing operations once the existing permitted reserves have been extracted and processed for market and that there will be no additional

					•	GV movements. Any planning application must be accompanied by an assessment of air quality impacts from HGVs and other affic accessing the site, particularly on areas of poor air quality to satisfy Policy DM 11 in the KWMLP.										
	Sustainable	Short 0	Med ++/-	Long 0	Prob	Dir/Ind	Rev?									
4	economic growth	The site would make a contribution to the supply of flint sand and gravel as a material to support economic growth, although t use of non-renewable resources is a less sustainable route to growth than using recycled aggregate.														
		Short 0	Med ?	Long ?	Prob L	Dir/Ind D	Rev?									
5	Flood risk	specific F	Flood Ri	sk Asses d risk. ⁻	ssment to	o demonstra should also	ate no ao assess	Ing flood defences. Any planning application must be accompanied by a site-diverse effect on flood risk and where practicable contribute to an overall the potential effects on the flood defences and mitigation must be included to fences for maintenance.								
		Short 0	Med ?	Long ?	Prob M	Dir/Ind D	Rev?									
6	Land	lower qu agricultu The site operation proposed	ality gra ral after is withinns on Gi d develo	ade 3 lar ruse of t n the Me reen Bel opment v	nd, which he site in etropolita t objecti would no	h would be n accordance n Green Be ves and the	lost to done with Pelt. A place tests of	atural England show the land at the site to be grade 3 agricultural land, possibly evelopment. The restoration of the site would be required to be sensitive to the olicy DM 19 restoration, Aftercare and After-use. Inning application would be required to provide evidence of the impact of what constitutes appropriate development in the Green Belt and justify why the priate development and if so that there are very special circumstances that asse.								
7		Short 0	Med ?	Long ?	Prob M	Dir/Ind D	Rev?									

l		A desk b	asea ar	chaeolog	gical ass	sessment ha	s been p	repared by the promoters of the site and has been assessed as inadequate.				
		There is	potentia	al for sig	nificant	multi-period	d and pal	laeo-environmental remains to survive on the site. Any planning application will				
	Landscape and	need to	be acco	mpanied	l by a fu	ıll assessmeı	nt of the	archaeological value of the site, including a multi-phased programme would				
	the historic	need to	include	palaeo-e	environn	nental and g	eoarcha	eological assessment and assessment of historic landscape features as well as				
	environment	regular b	road ra	nged he	ritage a	ssessment t	o satisfy	Policy DM 6 Historic Environment Assessment.				
		The near	The nearest listed building is a coal marker at approximately 480m. No impacts are likely to listed buildings.									
		Short	Med	Long	Prob	Dir/Ind	Rev?					
		0		0	Н	D	Υ					
				•			_	estion on the A206 and at junction 1A approach to the M25 which already				
8	Transport	experien	ce signi	ficant co	ngestio	n at times.	This in t	urn affects the local road network as traffic seeks to avoid congestion on the				
		M25/A28	2. The	need to	import	an equal an	nount of	inert restoration fill material in addition to the HGV movements associated with				
		the mine	ral extra	action w	ill increa	ase HGV mo	vements	to 120 per day.				
		Joyce Gr	een Lan	ne is an ı	unclassit	fied rural lar	ne and m	nay be unsuitable for HGV movements and may require upgrading.				
		Short	Med	Long	Prob	Dir/Ind	Rev?					
		0			М	D	N					
		The sout	hern pa	irt of the	e site is i	in a groundy	water sou	urce protection zone 3. The site is also within Major Aquifer High Groundwater				
		Vulnerab	ility Zor	ne. Mine	eral extr	action and c	reation o	of a lake will cause a significant change to the local hydrology relative to the				
9	Water	existing network of drains and ditches that constitutes the Marsh. This has the potential to cause significant change to the										
		hydrolog	y of the	Dartfor	d Marsh	es which co	uld have	e significant adverse effects on its functioning and the species and habitats it				
		supports	. Anv p	lanning	applicat	ion should r	orovide d	letailed evidence to show that excavation will not significantly change the				
				-	• •	•						
		hydrology of the marsh, adverse effects on habitats and species can be avoided and groundwater will not be affected. Evidence should be provided to show how brackish/saline ingress will be managed.										
l		should h	e nrovic	led to ch	now how	i hrackich/ca	aline ina	ress will be managed				

Site M12: Postern Meadows

	Sustainability	Commen	ts													
	Objective															
		Short	Med	Long	Prob	Dir/Ind	Rev?									
		-/+	-/+	-	М	D	N									
		Part of th	Part of the site is adjacent to East Tonbridge Copses and Dykes River Medway Local Wildlife Site designated for wetland features													
		and of county importance. Any planning application must be accompanied by an assessment of the impacts of the proposed														
		development on the LWS, including from discharge to groundwater, dust and other discharges falling into the site and noise impacts														
		on wildlif	on wildlife. Appropriate mitigation must be proposed which demonstrates that significant adverse impacts will be avoided.													
		The site is two fields of grassland with mature trees/running between the two and surrounded by mature trees/hedgerows and the														
		Medway	Medway and Botany Stream run along the Northern and Eastern boundary.													
		Part of the northern edge and all the eastern edge of the site lie within an area subject to Adopted Tonbridge and Malling Managing														
1	Biodiversity	Development and the Environment Development Plan Document policy NE1 Local Sites of Wildlife, Geological and Geomorphological														
		Interest. There will be a need for ecological survey(s) to be carried out as part of any planning application and the restoration														
		scheme must demonstrate that the restored site would provide ecological enhancements and enhance the habitat adjacent to the														
		LWS.														
		The prop	osed sit	te includ	es areas	of priority	habitat.	Development will result in a partial loss of Traditional Orchard priority habitat								
		and may	potenti	ally have	indirec	t impacts to	Deciduo	ous Woodland priority habitat and an area of ancient woodland 190m to the								
		east.														
		There are	e record	ls of Him	alayan I	Balsam and	Mink in	the area. Operations at the site should not contribute to the spread of these								
		species a	nd whe	re practi	cal the	developer s	hould co	ntribute to management of these invasive non-native species as part of their								
		work at t	he site.													
	<u> </u>															

		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	0	Н	D	N								
2	Climate change	The site	is a nev	v site rat	her than	n a phased (extensio	n to existing workings and therefore will add to emissions from HGV movements							
		and othe	r site tr	affic and	l on-site	processing	. This w	ill have a negative impact on climate change, albeit small when considered in							
		terms of	the emi	issions ii	n the co	unty as a w	hole.								
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	0	М	D	Y								
		The site	has area	as that a	re proxi	mate to the	defined	built up area of Tonbridge and the Postern Bridge Cottages area. The health							
		and ame	nity of t	hese pro	operties	could be af	fected by	the extraction and processing of aggregates, including from noise, dust,							
		vibration, light, visual amenity and drowning risk. Any planning application must be accompanied by an assessment of the likely													
		impacts of operations and restoration on health and amenity and mitigation must be provided to demonstrate that impacts can be													
3	Community and	managed	to acce	eptable l	evels.										
	well-being	A transpo	A transport routeing strategy should be designed to avoid the Tonbridge AQMA to avoid adverse impacts on an area of poor air												
		quality.													
		Footpath MU33 runs adjacent to the southern boundary of the site. Footpaths MU32 and MU34 are both within 90m of the site.													
		Wealdway and Medway Valley Walk lies within 90m of the site. Footpath MU33 is currently well screened, however views of													
					•			earby public rights of way on Postern Lane to the south, and along the banks of							
			•			_		e landscape and visual impact effect should include retention of boundary							
		vegetatio	n, addi	tional pl	anting a	nd the crea	tion of b	unds to ensure significant negative impacts are avoided.							
	Sustainable	Short	Med	Long	Prob	Dir/Ind	Rev?								
4	economic	++/-	++/-	0	Н	D	N								
'	growth	The site	would n	nake a c	ontribut	ion to the s	upply of	sharp sand and gravel as a material to support economic growth, although the							
	. <u> </u>	use of no	on-rene	wable re	sources	is a less su	stainable	route to growth than using recycled aggregate.							
5	Flood risk	Short	Med	Long	Prob	Dir/Ind	Rev?								

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		?	?	?	L	D	N						
		The site	lies in fl	ood zon	e 3. Any	/ planning a	pplicatio	n must be accompanied by a site-specific Flood Risk Assessment to demonstrate					
		no adver	se effec	t on floo	od risk a	nd where pr	racticable	e contribute to an overall reduction in flood risk.					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		?	?	?/0	L/M	D	N/Y						
		Agricultu	ral Land	l d Classifi	cation m	ı aps produc	ed by Na	atural England show the land at the site to be grade 3 agricultural land. If the					
6	Land	site is wo	orked th	is will be	e lost, w	hich would	be signif	icant if the land were grade 3a, which is unknown at this stage. Restoration is					
		to open v	water.										
		The site	is withir	n the Me	tropolita	n Green Be	lt. A pla	nning application must provide evidence on the impact of operations on the					
		Green Belt and justify why these do not constitute inappropriate development affecting openness or constitute very special											
		circumsta	ances.										
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		-/?	-/?	0/?	L	D	Y/N						
		The site	lies clos	e to the	High W	eald AONB.	Whilst I	ocated only approximately 1km from the boundary of the AONB, the site would					
		be separated from the designation by intervening urban and industrial development immediately to the south. Operations at the site											
		are unlikely to materially affect the statutory purposes and special qualities of the High Weald AONB											
	Landscape and	Working at the site would extend the developed area into a more rural area, resulting in significant changes to the landscape											
7	the historic	character locally. The site would also be visible from the nearby Postern Bridge Cottage resulting in significant adverse effects for											
	environment	residents	of the	property	. Views	of activities	s at the s	site are also likely to be available from nearby public rights of way on Postern					
		Lane to t	he sout	h, and a	long the	banks of th	ne Medw	ay to the north and west. Mitigation of the landscape and visual impact effect					
		should in	iclude r	etention	of boun	dary vegeta	tion, add	ditional planting and the creation of bunds.					
		There are	e two g	rade II li	sted bui	ldings and o	one grad	e II* listed building on Postern Lane. The nearest is 325m to the south east on					
		Postern I	_ane an	d therefo	ore adve	rse effects	on these	assets are unlikely. The Central Tonbridge Conservation Area could potentially					
		be affect	ed by H	IGV mov	ements	generated b	y the de	evelopment. A transport routeing strategy should be provided alongside any					

		planning	applica	tion to s	how tha	t the Conse	ervation /	Area will be avoided.							
		The depo	osits wit	hin this	site do l	nave potent	ial for ea	arly prehistoric remains. Earlier extraction to the east has revealed remains of							
		timber st	tructure	s and a	possible	Saxon mill,	demons	trating the potential for evidence of later prehistoric and later use and							
		manager	ment of	the wate	er chann	nels.									
		Any plan	Any planning application must be accompanied by an assessment of the archaeological value of the site, with a multi-phased												
		programme of both desk based and field work, with mitigation fully informed and appropriate to the significance of the heritage													
		assets af	fected.	The mu	ılti-phas	ed program	me woul	d need to include palaeo-environmental and geoarchaeological assessment as							
		well as re	egular b	road rar	nged her	ritage asses	sment.								
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	0	М	D	Y								
		Access is	Access is via Postern Lane on which there is a public right of way. The junction with Vale Road is a simple priority junction and												
		scope fo	r improv	ements	is limite	d due to th	e river b	ridge immediately to the north of the site access. Vale Road and adjoining							
8	Transport	highway network is already congested at peak times therefore any significant level of intensification is likely to create significant													
	Transport	adverse impacts on the local road network. Postern Lane also meets the B2017 Tudeley Road where there is limited forward													
		visibility at the junction. Any intensification of use would require junction improvements. Hartlake Road to the east is a narrow lane													
		and use by HGVs would have adverse impacts. A Transport Assessment will be required to demonstrate that the predicted													
		generation of HGV movements can safely be accommodated on the road network without unacceptable adverse impacts on													
		congesti	on.												
		Short	Med	Long	Prob	Dir/Ind	Rev?								
		-	-	-	М	D	N								
9	Water	There is	existing	sewera	ge infras	structure cr	ossing th	e site. This must be protected or diverted to ensure the infrastructure is not							
		adversely	y affecte	ed.											
		The site	is in a g	roundwa	ater Sou	rce Protecti	ion Zone	3 and a minor aquifer in a High Groundwater Vulnerability Zone. Any planning							
		application	on must	demons	strate th	at operatio	ns at the	site and following restoration will not have adverse effects on the aquifer.							

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Site M13: Stonecastle Farm Quarry Extension

	Sustainability	Commen	its													
	Objective															
		Short	Med	Long	Prob	Dir/Ind	Rev?									
		-/+	-/+	-/0	М	D	N									
		The site	The site is adjacent to the East Tonbridge Copses and Dykes and River Medway Local Wildlife Site designated for wetland features													
		and of county importance. Any planning application must be accompanied by an assessment of the impacts of the proposed														
		development on the LWS, including from discharge to groundwater, dust and other discharges falling into the site and noise impact														
		on wildlif	on wildlife. Appropriate mitigation must be proposed which demonstrates that significant adverse impacts will be avoided. This is													
		likely to include an appropriate buffer and hydrological monitoring to ensure the LWS is not affected.														
	Biodiversity	The southern part of the side is adjacent to ancient woodland and there is the potential for operations to adversely affect the														
		woodland. Mitigation must be provided to prevent adverse effects, which could include provision of a suitable buffer, hydrological														
1		monitoring and noise, dust and lighting measures.														
		The site is a large arable field with hedgerows within and surrounding the site, and with a block of woodland within the site. There														
		is a block of deciduous woodland priority habitat within the site which will be lost. There is another area of deciduous woodland														
		priority habitat adjacent to the site which may be indirectly adversely affected. The habitats within or adjacent to the site have														
		potential to contain protected/notable species including bats, badgers, dormice, otters, harvest mice, reptiles, invertebrates, brown														
						<u>.</u>	_	irds. Habitat within the site will be lost with a consequent negative impact on								
			•				_	al survey(s) to be carried out. Any planning application must be accompanied								
			_	•		•	ie of the	site and restoration should replace and enhance the ecological interest of the								
		site and														
		There ar	e record	ls of Nut	tall's po	ndweed and	d Crassul	a in the area. Operations at the site should not contribute to the spread of								

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		these spe	ecies an	d where	practica	al the devel	per sho	uld contribute to management of these invasive non-native species as part of								
		their wor	k at the	e site.												
		Short	Med	Long	Prob	Dir/Ind	Rev?									
		0	0	0	Н	D	N									
		The site	is propo	sed as a	n exten	sion to exist	ting oper	rations, with phasing to work this and the proposed Moat Farm site (M10) to be								
2	Climate change	sequentia	sequential. Therefore there would be no concurrency of operations at Moat Farm or Stonecastle Farm therefore extraction would be													
		at the sa	at the same rate of mineral extraction of 120,000 tonnes per annum (the same as the existing Stonecastle Farm Quarry site). The													
			limate change impacts from HGVs and other vehicles accessing the site and on-site processing are likely to be unchanged from													
		current le	evels.													
		Short	Med	Long	Prob	Dir/Ind	Rev?									
		0	0	0	Н	D	Y									
		The prop	he proposed site is unlikely to have significant impacts on health and wellbeing from dust, noise, visual amenity, light, vibration or													
		drowning	drowning. The nearest properties are 230m from the site and screened by woodland.													
3	Community and	The Med	The Medway Valley Walk long distance path is located north of the site but at close range views are prevented by mature woodland.													
	well-being	There is a public right of way WT168 which crosses Tarmac land beyond the limits of extraction and this will be retained throughout.														
		The publ	The publicly accessible visual receptors in this area with views towards the site are a limited section of Hartlake Road and the													
		, .		•				ng distance path is located north of the site but at close range views are								
		•	-				•	nere would be significant effects on residential properties given the distance								
		-	site, or	on users			bounda	ry vegetation is retained.								
		Short	Med	Long	Prob	Dir/Ind	Rev?									
4	Sustainable	++/-	++/-	0	Н	D	N									
	economic growth	The site	would n	nake a c	ontribut	ion to the s	apply of	sharp sand and gravel as a material to support economic growth, although the								
		use of no	on-rene	wable re	sources	is a less sus	stainable	route to growth than using recycled aggregate.								
	1															

		Short	Med	Long	Prob	Dir/Ind	Rev?						
		?	?	?	L	D	N						
5	Flood risk					, ,		on must be accompanied by a site-specific Flood Risk Assessment to ere practicable contribute to an overall reduction in flood risk.					
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		0/?	0/?	0	Н	D	N						
		Agricultu	ral Land	Classifi	cation m	naps produc	ed by Na	atural England show the land at the site to be grade 3 agricultural land. A					
		survey ca	arried o	ut in 199	98 show	ed 81% of t	the land	to be grade 3b and the remainder grade 2 and 3a. If the site is worked this will					
6	Land	be lost, b	out as th	ne soil is	mostly	grade 3b, tl	his is not	a significant adverse effect. Restoration is to landscaped lakes.					
		The site	is withir	n the Gr	een Belt	. A planning	applicat	cion would be required to provide evidence of the impact of operations on Green					
		Belt obje	ctives a	nd the t	ests of v	vhat constit	utes app	propriate development in the Green Belt and justify why the proposed					
		•						elopment and if so that there are very special circumstances that justify the					
		acceptability of the development in this case.											
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		?	?	?	М	D	Y						
		The prop	osed al	location	lies 1.5k	m from the	High W	eald AONB but will be well-screened from the AONB if boundary vegetation is					
	Landscape and	retained.	Howe	ver, ther	e may b	e filtered vi	ews fron	n the AONB in winter. depending on the location of the fixed plant.					
7	the historic	There is	a grade	II listed	l building	g close to th	ne site ac	ccess, although with proposals to extract at 120,000 tonnes as existing, impacts					
	environment							it impacts. There are three grade II listings associated with Hartlake Farm to					
		the north	of the	site but	these a	re screened	by dens	e woodland and therefore significant impacts are unlikely.					
						•		rly prehistoric remains. Earlier extraction to the east has revealed remains of					
						•		trating the potential for evidence of later prehistoric and later use and					
		manager	nent of	the wat	er chanr	nels. A num	ber of W	/WII defensive sites are located along the Medway to the north and features					

		associated with these may fall within the proposed site. However, an assessment of archaeological and heritage value of the site								
		has concluded that the site has low potential for recovery of archaeological remains and that there are no significant impacts on								
		designate	ed or ur	ndesigna	ted asse	ets.				
	Transport	Short	Med	Long	Prob	Dir/Ind	Rev?			
		0	0	0	Н	D	Y			
		A Transp	ort Stat	ement h	as been	produced v	vhich has	s concluded that subject to some minor repairs and routine maintenance, the		
8		existing access to the site is acceptable to accommodate the proposed operations at Stonecastle Farm Quarry, assuming the sites								
		(both Mo	at farm	and Sto	necastle	e Farm) พอเ	ıld be wo	orked sequentially and not concurrently, at the same extraction rate of 120,000		
		tonnes per annum as the existing permitted Stonecastle Farm Quarry site. It also concluded that the junction with the A228 was								
		acceptable and the developments would not result in an unacceptable impact on the road network or safety.								
	Water	Short	Med	Long	Prob	Dir/Ind	Rev?			
		-/?	-/?	-/?	М	D	N			
		The proposed site extends into groundwater Source Protection Zones 1, 2 and 3 in an area important for local water supply. Further								
		major extensions to the quarry may adversely impact water supply options. South East Water have concerns about potential								
		impacts on groundwater quantity and quality.								
9		A hydrological and hydrogeological appraisal has been undertaken of the potential impacts of the existing consented site which								
9		concluded adverse effects on groundwater flow and quality (this assessment accounting for the ameliorating effects of the alteration								
		of the mode of mineral extraction from dry to wet working) and those associated with any future mineral workings within the								
		Potential Allocation Area. The appraisal proposes mitigation measures that enables it to conclude that there are no over-riding								
		hydrogeologically or hydrologically based reasons why the planned development should not proceed in the manner described.								
		Plans for restoration should assess the proposed interface between the lakes and the adjoining River Medway, the Hammer Dyke								
		and associated drains. Given that Stonecastle Farm is predominantly underlain by Weald Clay Formation there is some uncertainty as to how sustainable the restoration plan is, independent of a feed from any one of the watercourses that will bound the lakes,								
		as to now sustainable the restoration plan is, independent of a feed from any one of the watercourses that will bound the lakes,								

once the mineral has been extracted.	The restoration plan will need to include evidence demonstrating as to how the integrity of
those watercourses sited on the curtil	lage of the workings will be retained.

Appendix E: Detailed Findings and Recommendations of SA of Alternatives to Land-Won Aggregates

Key:

Impacts	Probability of effects	Direct or indirect effects	Reversibility
++ significant positive effect	L low probability	D direct effect	Y reversible effect
+ some positive effect	M medium probability	I indirect effect	N not reversible i.e. permanent effect
0 no effect	H high probability		
- some adverse effect			
significant adverse effect			
? uncertain effect			

	Sustainability Objective	Comments									
		Short	Med	Long	Prob	Dir/Ind	Rev?				
		-/?	-/?	?	L	I	N				
		The increased supply of marine-dredged aggregates (MDA), secondary and recycled aggregates and land-won									
		aggregates from outside of Kent will help to reduce the potential negative impacts on biodiversity associated with									
1	Biodiversity	proposed site allocations, although some negative impacts from some land-won aggregate sites are still likely. The									
		scale of the benefits will depend on which sites are replaced by the supply of alternatives. Opportunities will for habitat									
		improvement and improved access through restoration will be lost, although the loss of this benefit is unlikely to be									
		significant. There may be biodiversity impacts associated with transport of alternative aggregates, but this is unlikely to									
		be significantly different from that associated with land-won aggregates. MDA may have adverse effects on marine									
		biodiversity	, but the like	lihood and	significance	of any effects	s is unknown	n. Import of land-won aggregates from outside			

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		of Kent n	nay hav	e biodiv	ersity imp	acts wher	e the a	ggregates	are ext	tracte	ed but the likelihood and significance of
		impacts a	are unk	nown.							
		Short	Me	ed	Long	Prob		Dir/Ind	Rev?		
		0/+		0/+	0/+	Н		D	N	١	
2	Climate change	There will be climate change impacts associated with the energy requirements for processing and transport of secondary and recycled aggregates and MDA, although these are not likely to be significantly different from the processing and transport of land-won aggregates. Two of the wharves safeguarded in the KMWLP and some of the recycled aggregate processing sites are connected to the rail network which may help to reduce the climate change impacts of road transport to a small degree. The import of land-won aggregates from outside of Kent is likely to be by bulk transport to be economic and therefore is likely to be transported by rail and through wharves. The climate change effects of this bulk transport are uncertain as this will depend on the distance the material has travelled which is not known. Once imported into Kent these land-									
3	Community and well-being	likely to I Short +/? The incre of Kent a aggregat rail and r on air qu would be	Med +/? eased sure unlikes to surecycled ality from common	Long +/? upply of cely to h upport co aggreg om road ed by alt munities	Prob L secondar ave a sigr onstructio ates from transport ternative	Dir/Ind D/I y and recy ificant imp n. There safeguard , although	Rev? Y cled ago pact on may be led rail the scansupply	ggregates commun e some sco depots, wale and sig	and MD. ities, altiope to trivinich wil	OA and thought and the little help ce of the won the little help ce of the won the little help ce of the little help ce of the won the little help ce of t	d import of land-won aggregates from outside the it will contribute to ensuring the supply of cort aggregates from safeguarded wharves by the to reduce the potential for adverse impacts this will depend on which land-won sites aggregates from outside of Kent may have the but the likelihood and significance of

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		Short	Med	Long	Prob	Dir/Ind	Rev?	
		++/-	++/-	++/-	Н	D	N	
4	Sustainable economic growth	of Kent v	vould m y and role route	ake a co ecycled a e to grow	ontributio aggrega wth. ME	pply of a he use o -won ago	regates and MDA and import of land-won aggregates from outside aggregates as a material to support economic growth. The use of f non-renewable resources and therefore constitutes a more gregates from outside of Kent are non-renewable resources and	
		Short	Med	Long	Prob	Dir/Ind	Rev?	
		0/?	0/?	0/?	H/L	I	Y	
5	Flood risk	may help	to avo	id the ne	eed for la	and-won mi	nerals si outside	regates and MDA will have no significant impact on flood risk. It tes in flood risk zones, but the scale of benefits is not known at this of Kent may have implications for flood risk where the aggregates mpacts are unknown.
		Short 0/?	Med 0/?	Long 0/?	Prob L	Dir/Ind I	Rev?	
								regates and MDA will have no significant impact on land use,
6	Land	_		•				most valuable agricultural land to land-won sites and help to avoid ne negative impacts from some land-won aggregate sites are still
			•				-	will depend on which land-won sites would be replaced by
		'						e impact on land from extraction of land-won aggregates from
		outside o	of Kent	depends	on the	sites from w	here the	e aggregates originate, which is unknown.
7	Landscape and the	Short	Med	Long	Prob	Dir/Ind	Rev?	
	historic environment	0/?	0/?	0/?	L	I	Y	

		The incre	ased su	apply of	seconda	ry and recy	cled agg	regates and MDA is unlikely to have any significant impact on					
		landscape and the historic environment, although it would help to avoid negative impacts associated with land-won											
		mineral sites although these are not considered to be significant. The likelihood and scale of those benefits will depend											
		on which	on which land-won sites would be replaced by alternative aggregate supply which is unknown at this stage. The										
		impact or	n land f	rom ext	raction c	of land-won	aggrega	tes from outside of Kent depends on the sites from where the					
		aggregate					- 55 - 5						
		Short	Med	Long	Prob	Dir/Ind	Rev?						
		+/?	+/?	+/?	L	I	Y						
		The incre	ased su	apply of	MDA ma	ı ay have a sl	ight bene	l efit in facilitating the transport of some aggregates by rail as two of					
		the whar	ves safe	eguarde	d in the	KMWLP are	connect	ed to the rail network. The supply of recycled aggregates could					
		also help	to pror	note alte	ernatives	s to road tra	ansport a	s several of the processing sites are rail-connected. The likely					
8	Transport	proportio	proportion of either MDA or recycled aggregates transported by rail is unknown and therefore the significance of any										
		benefits i	benefits is also unknown.										
		The impo	The import of land-won aggregates from outside of Kent is likely to be by bulk transport to be economic and therefore										
		is likely to	is likely to be transported by rail and through wharves which is a more sustainable mode than road. Once imported										
		into Kent these land-won aggregates are likely to involve road transport, although the effects may not be significantly											
							•	from sites in Kent.					
		Short	Med		Prob	Dir/Ind	Rev?						
		Snort	меа	Long	Prob	Dir/Ina	Rev?						
		0/-	0/-	0/?	L	I	Υ						
9	Water	The incre	ased su	of vlagu	seconda	rv and recv	cled agg	regates and MDA will have no significant impact on water quality or					
								r land-won minerals sites with potential adverse impacts on					
				-				some negative impacts from some land-won aggregate sites are					
		1 '					-						
		Suii possi	nie. IT	ie iikeiin	oou and	Significance	e oi bene	fits depends on which land-won sites would be replaced which is					

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	not known at this stage. Import of land-won aggregates from outside of Kent may have effects on water quality and
	quantity where the aggregates are extracted but the likelihood and significance of impacts are unknown.

Appendix F: Contribution of Other Plans and Strategies to Cumulative Effects

Shepway Core Strategy Local Plan, Shepway District Council, September 2013

There is a target for construction of 400 dwellings per year to 2026 and to deliver an average of approximately 1 hectare per year (to 2026) of office/industrial premises.

Business activity and the provision of jobs will be facilitated through supporting town centres, the protection of sufficient employment land across the district, allocations and concerted efforts to deliver rural regeneration (especially in south and west Shepway).

The Plan seeks to accommodate new retail, leisure and an improved public environment at Folkestone, Hythe and New Romney town centres. The majority of Shepway's commercial floorspace and the majority of the urban area's housing development will take place in Folkestone, to enhance its role as a sub-regional centre.

The Plan seeks to regenerate Romney Marsh through a positive approach to sustainable economic development and infrastructure opportunities, and through increasing the strategic role of New Romney town in serving the area. The future spatial priority for new development in the Romney Marsh area is on accommodating development at the towns of New Romney and Lydd and at sustainable villages, improving communication, and on protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness.

The strategic growth of New Romney is supported to allow the market town to fulfill its potential to sustainably provide for the bulk of the housing, community infrastructure and commercial needs of the Romney Marsh Area. Development will also be planned at other identified settlements in line with the Settlement Hierarchy sufficient to ensure the achievement of growth requirements. In particular, development which helps to maintain and support the local role of the market town of Lydd, and rural centres including Sellindge, can meet priority needs.

New Romney is defined as a Strategic Town, to accommodate significant development – in so far as consistent with maintaining historic character – appropriate to the needs of its wider hinterland in Shepway, and maintaining the viability of its local transport hub, town centre and higher-order tourism, employment and public services. It is expected to be suitable for expansion from its current built limit. The town centre will accommodate the majority of the identified needs for retail, office and leisure uses through new development to improve its vitality, public realm, mix of uses, and daytime and evening economy.

New Romney should develop as the residential, business, service, retail and tourist centre for the Romney Marsh. The future development of the town should seek to support the retention of existing businesses and the attraction of new employment opportunities through the provision of an adequate supply of employment land to meet future need and through the provision of a sufficient level of new residential development to maintain an adequate labour supply.

There is a broad location for residential development to the north of the town centre, to provide around 300 dwellings (Class C3). Appropriate off-site mitigation measures must be identified, including to ameliorate highway impacts and manage drainage demands.

A site at New Romney is identified as appropriate as a Major Employment Site, to protect existing and provide further industrial premises suitable to the needs of Shepway's businesses and inward investors.

The junction of A259/B2071/ Church Road junction is identified as strategically critical infrastructure for improvement by 2026. Hammonds Corner west of New Romney A259/ B2075 junction improvement is identified as important, potentially necessary infrastructure to help deliver the Core Strategy.

Lydd is identified as a Service Centre, to accommodate development appropriate to Shepway and its own needs, in order to grow and consolidate its position as a District Centre serving the local hinterland with shops, employment and public services. Lydd has played a significant role in the district's development and includes some significant opportunities, but they should be delivered without a substantial expansion of the outer extent of its built environment. It will accommodate appropriate development to maintain its mix of uses and improve its vitality, viability and public realm.

There are sites in Lydd appropriate as Major Employment Sites, to protect existing and provide further industrial (B-class and similar sui generis uses) premises suitable to the needs of Shepway's businesses and inward investors.

Dymchurch is identified as a Rural Centre, to develop – consistent with enhancing the natural and historic environment – in a manner that supports its role as an integrated tourist and local centre providing shops and services for a significant number of residents, visitors, and also for other villages in Romney Marsh. The aim is to protect crucial services and accommodate development that maintains its viability for residents and visitors.

St Mary's Bay, Greatstone-on-Sea, Brookland and Brenzett are identified as Primary Villages, to contribute to strategic aims and local needs; and as settlements with the potential to grow and serve residents, visitors and neighbourhoods in the locality with rural business and community facilities.

Connections to existing ports and airports within and outside the district will be promoted, such as by new

rail and coach services, and to support improved access to London Ashford (Lydd) Airport subject to no

adverse environmental consequences.

Lydd is identified as a Green Infrastructure (GI) Fringe Zone. Green infrastructure will be protected and

enhanced and the loss of GI uses will not be allowed, other than where demonstrated to be in full

accordance with national policy, or a significant quantitative or qualitative net GI benefit is realised or it is

clearly demonstrated that the aims of this strategy are furthered and outweigh its impact on GI. Shepway's

GI network and other strategic open space will be managed with a focus on:

Adapting to and managing climate change effects;

Protecting and enhancing biodiversity and access to nature, and avoiding development which results

in significant fragmentation or isolation of natural habitats;

Identifying opportunities to expand the GI functions of greenspaces and their contribution to a

positive sense of place;

Tackling network and qualitative deficiencies.

Contribution to Cumulative Effects

The development of new housing and employment sites and enhancing the vitality of New Romney, Lydd

and smaller settlements in the Romney Marsh area will provide housing, employment and services for the

needs of local communities. They will also contribute to increased demand for use of the road network and

contribute to increased greenhouse gas emissions. Improving access to Lydd Airport for road vehicles will

also increase demand for road space, although improving rail connections may help to bring about a modal

shift and reduce demand for road space. Improvements to the junction of the A259 and B2075 should assist

the function of the junction, potentially assisting mineral site traffic.

Minerals development may potentially be in conflict with green infrastructure policy for Lydd.

Relevant minerals site: M2

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Council Core Strategy Review, Consultation Draft Plan, Shepway District Council, March 2018

The future spatial priority for new development in the Romney Marsh Area is on accommodating development at the towns of New Romney and Lydd, and at sustainable villages; improving communications; protecting and enhancing the coast and the many special habitats and landscapes, especially at Dungeness; and avoiding further co-joining of settlements and localities at the most acute risk to life and property from tidal flooding.

In all other substantive aspects, the policies for Lydd and New Romney are unchanged.

Contribution to Cumulative Effects

As for the Core Strategy Local Plan September 2013

Maidstone Borough Local Plan, Maidstone Borough Council, October 2017

An expanded Maidstone urban area will be the principal focus for development in the borough. Approximately 1,846 new dwellings will be delivered on 23 sites, with approximately 11,400m² of retail floorspace, approximately 6,000m² of employment floorspace and a medical campus of up to 100,000m² floorspace. Key infrastructure requirements include improvements to highway and transport infrastructure, including junction improvements, capacity improvements and improved pedestrian/cycle access and bus prioritisation measures

Rural service centres including Harrietsham and Lenham will be a secondary focus for housing development with the emphasis on maintaining and enhancing their role and the provision of services to meet the needs of the local community. Suitably scaled employment opportunities will also be permitted, building on and expanding existing provision in these locations.

In Harrietsham, key services will be retained and supported. In addition to minor development and redevelopment of appropriate sites, approximately 242 new dwellings will be delivered on three allocated sites. Two existing sites are designated as Economic Development Areas in order to maintain employment opportunities in the locality. Key infrastructure requirements for Harrietsham include improvements to highway and transport infrastructure including improvements to the A20 Ashford Road, improvements to Church Road and the provision of additional pedestrian crossing points

At the rural service centre of Lenham, key services will be retained and supported. In addition to minor development and redevelopment of appropriate sites, approximately 155 new dwellings will be delivered on

two allocated sites, Tanyard Farm and Glebe Gardens, both to the east of Lenham on the Old Ashford Road. Three existing sites are designated as Economic Development Areas in order to maintain employment opportunities in the locality. Key infrastructure requirements for Lenham include improvements to highway and transport infrastructure including junction improvements, a variety of measures to improve sustainable transport infrastructure, and improvements to pedestrian access. The council will seek to maintain and enhance the existing retail function and supporting community uses in The Square.

Lenham is also identified as a broad location for growth for the delivery of approximately 1,000 dwellings post April 2021. Master planning of the area will be essential to achieve a high quality design and layout, landscape and ecological mitigation, and appropriate provision of supporting physical, social and green infrastructure. Housing site allocations and associated infrastructure requirements will be made through the Lenham Neighbourhood Plan or through the local plan review to be adopted by April 2021. The broad location for growth is on the east side of Lenham, between the current built up area and the Northdown Business park on the Ashford Road to the west of mineral site M3.

The council and its partners will:

- Ensure the transport system supports the growth projected by Maidstone's local plan and facilitates economic prosperity;
- Deliver modal shift through managing demand on the transport network through enhanced public transport and the continued Park and Ride services and walking and cycling improvements;
- Improve highway network capacity and function at key locations and junctions across the borough;
- Improve transport choice across the borough and seek to influence travel behaviour;
- Address the air quality impact of transport.

A prestigious business park at Junction 8 of the M20 that is well connected to the motorway network will provide for a range of job needs up to 2031. The site will make a substantial contribution to the need for new office space in the borough as well as meeting the 'qualitative' need for a new, well serviced and well connected mixed use employment site suitable for offices, industry and warehousing.

Contribution to Cumulative Effects

Proposed housing and economic development at Lenham and Harrietsham will provide housing, employment and services to meet the needs of communities, contributing to their wellbeing. It will increase traffic on the A20 and through junction 8 of the M20, potentially in competition with the traffic accessing the minerals site.

Policy on managing the transport impacts of development may help to avoid or reduce increased demand for

road space. The development of new sites for housing and employment is likely to increase pressures on

biodiversity. Greenhouse gas emissions will be increased.

Relevant mineral site: M3

Submission Local Plan 2030, Ashford Borough Council, December 2017

A total housing target of 12,950 net additional dwellings applies for the Borough between 2017 and 2030.

The majority of new housing development will be at Ashford and its periphery, as the most sustainable

location within the Borough based on its range of services and facilities, access to places of employment,

access to public transport hubs and the variety of social and community infrastructure available. In addition

to existing commitments, new land allocations to deliver 5,159 dwellings are proposed.

Job growth and economic prosperity will be supported in order to enable the achievement of a sustainable

economy with the intention to deliver 66 hectares of new employment land and a total of 11,100 jobs in the

Borough between 2014-30.

A regenerated Ashford Town Centre will expand significantly its leisure, cultural, educational and residential

offer. A new Commercial Office Quarter next to the railway station will be a major economic impetus for the

area, helping to substantially increase employment, trigger more spending in the town centre economy, and

improve wage rates and skills levels.

The other rural service centres, including Charing, will remain important providers of local shops and

services, whilst delivering new development of a scale appropriate to the individual characteristics of the

settlement. Smaller rural settlements will also provide smaller scale new development, to help sustain local

communities.

Land at Northdown Service Station in Charing is proposed for residential development for up to 20 dwellings.

Development proposals for this site shall provide vehicle access onto the A20 Maidstone Road.

The land south of the Arthur Baker playing fields in Charing is proposed for residential development, up to

35 units. Development proposals for this site shall provide a vehicular, pedestrian and cycle link from the

A20 through the site to the adjoining Arthur Baker playing fields and be designed to include a built-up

frontage to the A20.

The site to the rear of the Holiday Inn at Hothfield is proposed for residential development with an indicative

capacity of 150 dwellings. Development proposals for the site shall be designed and laid out to take account

of the surrounding uses in particular the existing hotel and the M20 motorway and provide a primary

vehicular access directly from the A20 Ashford Road.

The site to the rear of Westwell Lane at Tutt Hill is proposed for residential development with an indicative

capacity of 75 dwellings. Development proposals for this site shall provide primary vehicular access from the

A20 Ashford Road.

Provision of new employment premises, and the redevelopment, enhancement and reconfiguration of

existing employment premises will be permitted within or adjoining the built-up confines of Ashford,

Tenterden and the rural settlements, provided that: any impact upon the local road network can be

mitigated. In the rural settlements, it must be demonstrated that the development will not generate a type

or amount of traffic that would be inappropriate to the rural road network that serves it.

Contribution to Cumulative Effects

The provision of housing and employment sites in the Borough will help to meet the needs of communities

leading to increased wellbeing. Development of greenfield sites is likely to lead to increased pressure on

biodiversity. Proposed housing developments at Charing and to a lesser extent at Hothfield and Tutt Hill are

likely to increase demand for road space on the A20, potentially in competition with mineral site traffic. The

Plan requires mitigation of impacts on the road network, so effects should be minimised although this is

uncertain.

Housing and economic growth in Ashford is likely to increase traffic on the M20. The scale of this

will be significantly greater than the impacts from minerals site traffic, which will arise from site M3

and also M2 as Ashford is likely to be an important market for minerals from site M2.

Relevant minerals site: M3, M2

Local Plan Regulation 19 Pre-submission Publication, Tonbridge and Malling Borough Council,

September 2018

The Local Plan provides for at least 6,834 dwellings to address in full the Objectively Assessed Need for

housing during the plan period up to 2031. Provision is made for at least 38 ha of additional employment

land to address the needs of the borough during the plan period up to 2031. Development will be

concentrated within the confines of urban areas, which include Tonbridge, the Medway Gap (including

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Aylesford, Ditton, Larkfield, Leybourne areas) and Snodland. Major new housing development will be delivered at the following strategic sites during the plan period up to 2031:

Bushey Wood, Eccles – 900 dwellings;

Broadwater Farm, north of Kings Hill – 900 dwellings;

South-west Tonbridge – 480 dwellings.

Outside of the urban areas, the focus of development will be within the confines of the Rural Service Centres, including West Malling. Within the confines of other rural settlements, development will be restricted to development that is proportionate to the scale and appropriate to the character of the settlement. These include Ryarsh, Addington, Addington Clearway, Birling Trottiscliffe, Wrotham and Wrotham Heath.

The Council will work in partnership with Kent County Council, Highways England, transport providers and other key stakeholders to ensure that developments:

are designed so that opportunities for sustainable transport modes are maximised; and

 make the necessary contributions to the improvement of existing, and provision of new, transport schemes that lead to improvements in accessibility and give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles;

The following areas are identified as areas of opportunity to help address the future longer-term development needs of the borough beyond 2031:

Bushey Wood, Eccles

East Malling Research Station, south Aylesford & Ditton

Land at East Malling Research Station can only be released for development in the post plan period once significant improvements to the A20/Mills Road/Hall Road junction have been implemented to the satisfaction of Kent County Council and the link between Hermitage Lane and the A20 at the 20/20 roundabout is complete and open and improvements to Junction 5 of the M20 motorway have been implemented.

The following sites, as defined on the proposals map, are allocated for employment development:

North of RBLI Warehouse, Aylesford (1.5 ha) (B1 and B8 uses)

East Malling Research Station (East) (5.5ha) (B1uses)

East Malling Research Station (West) (2.3 ha) (B1 uses)

Little Postern, Postern Lane, Tonbridge (10.8ha) (B2 and B8 uses)

Munday Works, Tonbridge (1.7 ha) (B1 and B2 uses)

Development of the sites for employment uses will only be permitted where it is of an acceptable design to

the locality and does not result in unacceptable impacts on the highway network, air quality and the amenity

of the area

Contribution to Cumulative Effects

The proposed housing and employment growth will enable the needs of communities for jobs and homes to

be met. However, the growth will result in increased greenhouse gas emissions. Development of new sites

is likely to lead to increased pressure on biodiversity from habitat loss and disturbance. Proposed

developments in the Medway Gap and at Snodland and Eccles are likely to increase demand for road space,

including on the A20. This could potentially be in competition for road space with minerals site traffic,

although as the proposed developments are at some distance from the minerals site cumulative effects on

the road network may not be significant.

The employment site at Postern Lane Tonbridge is likely to contribute to cumulative impacts on the local

road network which is constrained in that area. Housing development south west of Tonbridge is likely to

increase traffic on the A21.

Impacts of development on the transport network may be offset to some degree by the requirement for

measures to mitigate effects, although the overall balance of effects is not certain.

Relevant minerals sites: M8, M10, M12, M13

Project Name: Regulation 19 Consultation Document Title: Sustainability Appraisal Report – SA of the Cage 590 nerals Sites Plan

Site Allocations Local Plan, Tunbridge Wells Borough Council, July 2016

Land at Brook Farm, Capel (adjacent to this borough's boundary with Tonbridge & Malling Borough), as

shown on the Villages & Rural Areas (Capel) Proposals Map, is designated as a Key Employment Area.

Contribution to Cumulative Effects

The designated Key Employment Area is likely to increase traffic on the A228, although the site is relatively

small and the impacts are likely to be minor.

Relevant minerals site: M10, M13

Core Strategy DPD, Tunbridge Wells Borough Council, June 2010

Policy for development in Royal Tunbridge Wells provides for approximately 4,200 net additional dwellings

over the period 2006 to 2026. It encourages a greater proportion of office space (B1) within the town

centre, with approximately 23,500sqm (net) additional comparison retail floorspace to be provided by 2017

in the town centre. The Core Strategy emphasises the role of the town centre as a focal point for a mix of

employment, retail and complementary uses.

Approximately 300 net additional dwellings will be delivered in Southborough. In the order of 500sqm (net)

additional comparison floorspace will be delivered by 2017. Infrastructure improvements to encourage the

uptake of sustainable transport modes, such as walking, cycling and use of public transport, will be pursued

in order to reduce congestion and improve transport links to Royal Tunbridge Well. Measures to improve air

quality within the Air Quality Management Area will be investigated and pursued.

Contribution to Cumulative Effects

Proposed developments in Royal Tunbridge Wells and Southborough are likely to contribute to increased

wellbeing by meeting the needs of communities for homes and jobs. However, they will contribute to

increased greenhouse gas emissions and increased demand for space on the road network, potentially

including the A21, although this may be offset to some degree by measures to encourage sustainable

transport use and air quality improvements.

Relevant minerals sites: M10, M12, M13

Dartford Core Strategy, Dartford Borough Council, September 2011

Dartford Town Centre and Northern Gateway are to provide up to 3070 homes and 1500 jobs and up to 24,000m² net shopping floorspace. Of this, Northern Gateway will provide up to 2,040 homes, 1200 jobs in B1, B2 and B8 uses and provision of a mix of uses and the creation of a new area of public realm around the Mill Pond. Uses may include local shops and leisure uses, a hotel, community facilities and cafes, pubs and restaurants fronting onto the waterside.

The Core Strategy will create multifunctional greenspace alongside the River Darent and within and across the Northern Gateway site, providing at least 30% open space across the site, with provision for biodiversity and landscape improvements as well as recreational, sporting and amenity areas. Land at Dartford Fresh Marsh, the Mill Pond and the provision of a park on the eastern side will form part of the provision.

The Core Strategy seeks to minimise the amount of traffic generated by the Northern Gateway site, with an emphasis on sustainable forms of travel, with Fastrack provision through the site, direct access to Dartford station and foot and cycle connectivity. Planning applications must be supported by a transport assessment which takes into account all planned development in the town centre as well as the Northern Gateway. In advance of a Community Infrastructure Levy (CIL), a proportionate contribution will be required towards short-term mitigation measures to address any impact of the proposal on Junction 1a of the M25 (A282). A Travel Plan will be required for each application.

New residential communities will be focused on Ebbsfleet Valley and Stone, providing up to 7,850 homes within the Plan period, with further development beyond 2026. The Plan will also provide 9,700 jobs in offices and other B1 uses within the Plan period, with a concentration of these in the Ebbsfleet Valley. A centre of excellence for sport and recreation will be provided at Stone Lodge, expanding on the existing Olympic-level provision on the site. Options for the evolution of Bluewater which provide for a wider range of uses will be explored. At Ebbsfleet Valley, a community of up to 10,000 homes, (up to 5,250 assumed to be provided in the Plan period) with a business district providing approx 16,900 jobs, (up to 9,500 assumed to be provided in the Plan period) and leisure and retail uses to support local residents, workers and visitor.

The Kent Thameside Strategy for the waterfront seeks to open up access to the river for existing and future communities and to produce a high quality riverscape. Recent piecemeal development of the Thames Waterfront has not achieved the full potential that co-ordinated development of the riverside could bring. A number of potential sites on the Thames Waterfront present a unique opportunity to create mixed use development, bringing life and activity back to the river. The Council will promote the creation of a vibrant mixed-use riverfront, incorporating sustainable communities, new employment opportunities, leisure use of

the river /riverside and use of the river for sustainable transport, by supporting residential development of up to 3,750 homes and provision of up to 456,000 sq m of employment floorspace.

The Core Strategy seeks to protect and enhance Black Duck Marsh and Dartford Marshes as areas of biodiversity value and public recreational areas for quiet enjoyment, to the extent that the ecological protection of the area permits. New development will be expected to include connecting corridors of natural habitat along the river to enhance biodiversity linkages and to protect s41 species and other species of local ecological value.

In order to reduce the need to travel, minimise car use and make the most effective use of the transport network, the Council will:

- Encourage mixed use development and close interrelationship between complementary land uses: homes, jobs, shops and leisure, recreational and community facilities;
- Require major development sites to make provision for Fastrack as part of planning proposals.

In order to enable the transport network to respond to the pressures of new development, the Council will work with its partners to deliver a Strategic Transport Infrastructure Programme to ensure that the transport network operates at acceptable levels and that the transport infrastructure is in place to support new development.

The following infrastructure improvements are identified:

- Provision of Fastrack route through the Northern Gateway site by 2021
- A206/Marsh Street replacement of roundabout with signal controlled junction by 2021
- Junction 1A improvements by 2021

Contribution to Cumulative Effects

Planned housing and employment developments in Dartford will contribute to the wellbeing of communities by providing homes and jobs to meet identified needs. It will also contribute to increased greenhouse gas emissions. Growth in the town centre and Northern Gateway strategic site will create increased demands for space on the road network, very likely including the M25 and potentially also Bob Dunn Way although this is less likely. Growth in Stone and Ebbsfleet is also likely to increase demand for road space on the M25. This could potentially lead to cumulative impacts with minerals site traffic, although the scale of minerals traffic

impacts will be much smaller in comparison. Transport infrastructure improvements may help to reduce the

level of additional demand. The Core Strategy is likely to contribute to biodiversity enhancement and public

wellbeing by providing multifunctional greenspace and improved habitat connectivity.

Minerals development may potentially be in conflict with biodiversity and recreational policy in the Dartford

Marshes.

Relevant minerals sites: M7, M11

Bexley Core Strategy, London Borough of Bexley, February 2012

The Core Strategy provides for 5468 new dwellings and employment growth of 12500 jobs 2011-2026.

Crayford and Erith are identified growth areas with 1412 new dwellings and 2250 new jobs for the Erith and

Slade Green area, and 717new dwellings and 1750 jobs for Crayford and Old Bexley area.

The vision for the Erith geographic region will be achieved by:

making contributions to future housing and employment growth across the area but particularly

through development opportunities in and around Erith town centre, Slade Green, and designated

employment sites in the region;

supporting higher levels and more diverse employment, improved environmental quality of industrial

estates, enhanced public transport links and access to skills and training for new jobs by supporting

businesses in the region's town centres and employment areas;

encouraging further retail development, leisure developments and an enhanced variety of uses.

The vision for the Crayford and Old Bexley geographic region will be achieved by:

contributing to housing and employment growth by focusing growth in and around Crayford town

centre and the nearby employment locations, and to a lesser extent, Old Bexley

supporting Crayford's business function, as well as the managed consolidation of employment uses,

within the region;

progressing proposals that address local traffic issues, such as congestion in and around the town

centres (including the Bexley by-pass scheme, and London Road, Crayford) and low public transport

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accessibility levels, and schemes that would reduce reliance on car use (including walking and

cycling);

The Council will assist in developing a strong and sustainable local economy, so as to contribute to London

and Thames Gateway regeneration.

The Council will work to achieve a comprehensive, high quality, safe, integrated and sustainable transport

system which makes the most of existing and proposed transport infrastructure within the borough and

seeks to ensure a much improved and expanded role for public transport through effectively maintaining and

managing the existing highway network to ensure the free flow of traffic, improve the environment, in

particular air quality, and promote safety, health and wellbeing.

Contribution to Cumulative Effects

Planned housing, employment, retail and leisure development in Bexley will contribute to community

wellbeing by providing jobs and homes to meet the needs of local communities. Growth will also contribute

to increased greenhouse gas emissions. Growth planned for Erith, Crayford and Old Bexley will add to

demand for space on the road transport network both locally and also the M25, which may have attendant

impacts on the Bexley and Dartford AQMAs. Measures to promote sustainable transport choices and address

traffic issues will help to offset the potential adverse impacts on the road network and air quality.

Relevant minerals sites: M7, M11

Bexley Growth Strategy, December 2017

Good growth will be secured by focusing new residential development on a series of well-connected public

transport nodes, making the most of Bexley's riverside location and industrial heritage. Core industrial areas

retained for employment uses will be improved and intensified.

Erith will provide the opportunity to deliver an exciting and well-connected urban riverfront destination of up

to 6,000 new homes, with the area supporting up to 2,000 new jobs through a shift to new engineering and

manufacturing activities.

Crayford will provide the opportunity to consolidate and redefine the town centre, opening up the north of

the area to up to 1,000 new high quality homes with increased access to a more naturalised River Cray.

Employment will remain important to Crayford, with uses consolidated to the east, delivering 1,000

additional jobs. Targeting key junctions for improvement will allow for the enhancement of movement in and around the town centre and will increase local connectivity.

Situated next to one of London's remaining marshlands along the River Thames, Slade Green will be transformed into a high quality neighbourhood with a new local town centre set around a potential new Crossrail station and access to outstanding recreational spaces, delivering up to 8,000 new homes and 1,000 new jobs.

In line with principles of sustainable development, the strategy seeks to provide transport-orientated development where higher density mixed-use development is concentrated around public transport nodes, thereby making the most of cient use of the best-connected land. The proposed growth figures for housing and jobs are based on significant increases in connectivity through improvements to the existing transport infrastructure in Bexley,

The main elements of strategic transport infrastructure that will trigger growth in the borough are:

- a new transit system that introduces high quality local services, which link the main areas of activity and major transport nodes, the expectation being that there will ultimately be an uninterrupted segregated public transport corridor from Slade Green through to Abbey Wood and South Thamesmead, forming the basis of a future bus rapid transit corridor and/or tram operation;
- a DLR extension from the Becton line under the River Thames to Thamesmead, which could be extended on to Belvedere;
- an extension of Crossrail from Abbey Wood to Ebbsfleet, introducing high frequency and faster
 journey times to key employment and leisure destinations an extension on dedicated infrastructure
 that would require approximately 20km of new lines, signalling and electrification to avoid
 'performance pollution' resulting from mixing with existing North Kent Line services; and,
- new river crossings to address severance across the River Thames and provide much improved access between different market areas.

The strategy also envisages investment in necessary highway capacity at locally strategic road bottlenecks.

Contribution to Cumulative Effects

Growth planned for Erith, Crayford and Slade Green will add to demand for space on the road transport network both locally and also the M25, which may have attendant impacts on the Bexley and Dartford AQMAs. It will also contribute to increased greenhouse gas emissions. Measures to promote sustainable

transport choices and address traffic issues will help to offset the potential adverse impacts on the road

network and air quality.

Relevant minerals sites: M7, M11

Core Strategy and Policies for Management of Development (as amended), Thurrock Council,

January 2015

The Core Strategy makes provision through allocations at broad locations for approximately 13,550 dwellings

for the period 1 April 2009 to 31 March 2021. Within the overall total allocation, the Council has also made

an Indicative provision for 4750 dwellings for the 5-year period 1 April 2021 to 31 March 2026. The great

majority of new housing and associated development for the period 2009-2021 will be located in and around

the Thurrock Urban Area Key Centre for Development and Change including:

Purfleet: 3180 dwellings;

West Thurrock/Lakeside Basin: 3365 dwellings;

Grays: 2605 dwellings;

Tilbury: 470 dwellings;

Chadwell St Mary: 390 dwellings.

For the Period 2021-2026, indicative locations and capacity are as follows:

Lakeside Basin: 2600 dwellings (approx.);

Tilbury Town Centre: 546 dwellings (approx);

Grays: 1935 dwellings (approx);

West Thurrock: 279 dwellings (approx);

Stanford—le-hope and Corringham: 250 dwellings (approx).

The great majority of new housing, employment and associated development in the Borough will be located

in the Lakeside/West Thurrock Regeneration Area. A mix of 3,300 new dwellings will be located to the south

and east of Lakeside; new Neighbourhood Areas will be developed at West Thurrock and South Stifford including community and health facilities, primary schools and shopping facilities.

The Lakeside Basin will be transformed into a Regional Centre (town centre), and, together with the wider area, will provide between 7,000 and 9,000 jobs. Development will include a substantial expansion of retail floorspace (50,000 m² net of comparison floorspace) to serve sub-regional needs and additional convenience and service retail, office and leisure floorspace to broaden the mix of uses.

The transport network will be redesigned with improved accessibility east and west to Lakeside Shopping Centre from the A13, a relocated bus station and environmental improvements surrounding the Shopping Centre, including road and parking alterations.

The Plan proposes the provision of a new railway station at West Thurrock, introduces the South Essex Rapid Transit and will ensure pedestrian access will be improved, including north-south access from the river through Lakeside and West Thurrock to the Green Belt and beyond to South Ockendon.

Grays will be modernised and regenerated as the key Civic, Cultural and Education centre in the Borough. There will be provision of approximately 2,600 additional dwellings of different types and 1600 jobs including commercial offices in and around Grays. A new commercial and residential quarter will be developed to the south of the railway.

The Council has identified the Key Strategic Infrastructure Projects set out below as essential to the delivery of the Core Strategy, including.

- M25 widening to Dual four lanes north of Junction 30.
- M25 Junction 30/31 Improvements.

North of the Dartford crossing is identified as a key strategic employment hub and regeneration area.

The Council will work with partners to deliver at least a 10% reduction in car traffic from forecast 2026 levels. Measures include the following:

Improve public transport infrastructure in the Thurrock Urban Area through the phased delivery of the South Essex Rapid Transit (SERT) and other inter-urban public transport and bus priority, allowing fast and reliable services to the new Community Hospital and Learning Campus at Grays, Lakeside Regional Shopping Centre, and employment opportunities.

- Ensure new development promotes high levels of accessibility by sustainable transport modes and local services are conveniently located to reduce the need to travel by car.
- Employ Smarter Choices measures to change travel behaviour to achieve a reduction in forecast traffic
 and help to deliver better air quality and a better environment for job creation. Priority areas for
 Smarter Choices programmes include Grays and Lakeside.
- Identify priority areas such as Grays town centre and Lakeside Basin, for network efficiency improvement measures to address congestion and air quality issues. Other Air Quality Management Areas as well as growth/regeneration areas will undergo transport network improvements, including where improved access is required.

Regeneration and remodelling of the wider Lakeside Basin and West Thurrock areas will be taken forward with the following guiding principles:

- Securing more sustainable movement patterns, reduced private motor vehicle dependence and complementary travel demand management measures including an area-wide travel plan.
- Improving local accessibility and connectivity by public transport and pedestrian and cyclist permeability throughout the area including consideration of ways to reconnect the north and the south of the area, a high frequency service rail station in the south, and a personal rapid transit system.
- Providing the necessary improvements to the local and strategic road network.
- Introduction of a car parking charging and management regime.
- The Council will work with partners to deliver improvements to national and regional transport networks to ensure growth does not result in routes being above capacity. Public transport improvements will be prioritised in order to achieve a modal shift. To achieve this the Council and partners will:

Contribution to Cumulative Effects

Planned housing, employment, retail and leisure development in Thurrock will contribute to community wellbeing by providing jobs and homes to meet the needs of local communities. Proposed development in Thurrock will add to pressure on the M25 which could affect congestion and air quality south of the Dartford Crossing. Infrastructure improvements and measures to promote more sustainable transport modes may go

some way to offsetting the potential adverse impacts on the road network and on air quality along the M25. Greenhouse gas emissions will increase with the planned housing and employment growth.

Relevant minerals sites: M7, M11

Local Transport Plan 4: Delivering Growth Without Gridlock 2016-2031, Kent County Council

The Counci's strategic transport priorities include the following:

Enabling Growth in the Thames Estuary with a range of measures including Crossrail extension to Dartford and Ebbsfleet and an expanded Fastrack bus network.

Bifurcation of Port Traffic: traffic for the Eastern Docks would be encouraged to use the M2/A2. Bifurcation will also facilitate growth of Whitfield, Folkestone, Ashford and Maidstone by releasing capacity on the M20.

Port Expansion: The Western Docks will provide a cargo terminal with a port-centric distribution centre, allowing the existing cargo operations to move out of the Eastern Docks so a dedicated ferry terminal and an increase in freight vehicle space can be delivered. The Port of London has set its goal to become the busiest it has ever been by 2035, including greater use of the Thames wharves for river transport of freight that will take up to 400,000 lorries of the region's roads. The Port of Sheerness largely handles bulk goods and also has signi cant expansion plans. The Port of Ramsgate has potential for growth and could also contribute to the strategic priority of bifurcation.

A Solution to Operation Stack: delivery of a Lorry Area that will reduce the need to use the M20 to queue freight vehicles during times of disruption to cross-Channel services

Transport schemes that have a countywide impact (particularly in terms of supporting sustainable travel) are:

Kent Thameside Local Sustainable Transport Fund (£4.5m LGF funding), a capital programme of works for Dartford and Gravesham delivering schemes to promote the use of alternative modes of transport to the private car, e.g. cycle parking, cycle and walking routes and bus infrastructure.

West Kent Local Sustainable Transport Fund (£4.9m LGF funding), a capital programme of works delivering schemes to promote the use of alternative modes of transport to the private car, including Snodland Station forecourt, Tonbridge Station access improvements, Maidstone East Station improvements and Swanley Station improvements.

'Smart' (managed) motorway to increase capacity on the M20 and M26.

Transport priorities for Dartford include:

Improvements or new bridge at A282 Junction 1a

Pedestrian/cycle bridge over River Darent at Northern Gateway strategic site

Meausres to address the impacts of Dartford Crossing traffic on the local road network

Dartford town centre improvements

Priorities for Maidstone include M20 junctions 3 to 5 'smart' (managed) motorway system.

Transport priorities for Shepway include:

Highway improvements and sustainable access to support Lydd Airport

New Romney South Spine Road, A259 west of New Romney to Mountfield Road

Contribution to Cumulative Effects

Proposed measures are likely to relieve pressure on the road network in Dartford, increase capacity on the M20 and M26, improve traffic flow in the Romney Marsh area and promote greater use of the rail network.

Impacts on greenhouse gas emissions are uncertain.

Relevant minerals sites: M2, M3, M7, M8, M11

Waste and Minerals Plan for East Sussex, South Downs and Brighton & Hove, February 2013

The Authorities will maintain provision for the production of land won aggregates at a rate of 0.10mtpa throughout the Plan period. The Mineral Planning Authorities will maintain a landbank of at least 7 years of

planning permission for the extraction of sand and gravel.

Contribution to Cumulative Impacts

The Plan will support continued extraction of sand and gravel at sites in East Sussex.

Relevant minerals site: M2

Waste and Minerals Sites Plan, East Sussex County Council, February 2017

The following land-won minerals resources are identified as Mineral Safeguarding Areas:

Scotney Court Farm, Jury's Gap Road, Camber, near Lydd

Scotney Court Extension and Wall Farm, Jury's Gap Road, Camber, near Lydd

Broomhill, near Lydd

Contribution to Cumulative Effects

The Plan will support continued extraction of sand and gravel at sites on the Dungeness peninsula.

Relevant minerals site: M2

Core Strategy, Rother District Council, September 2014

The Strategy for the Overall Spatial Development is to:

plan for at least 5,700 dwellings (net) in the district over the period 2011-2028;

plan for at least 100,000 square metres of gross additional business floorspace.

New development will be focused at Bexhill, giving particular attention to promoting economic regeneration and growth of the Hastings and Bexhill area. Some development will be provided for in Battle and Rye that helps maintain their small market town roles and is consistent with their respective environmental constraints and settings.

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Proposals for development and change in Rye and Rye Harbour Village will:

Promote efficiencies and improvements to the strategic transport network to improve connectivity

between Rye and other major urban centres;

Support traffic management on the local road network, promote sustainable alternatives to the car

and implement the objectives stated in Local Transport Plan 3 and the Rye Local Area Transport

Strategy;

Provide between 355-400 dwellings net additional dwellings between 2011 and 2028. Opportunities

for growth will primarily be sought within the built up area of Rye;

Seek to secure and maintain effective flood defences for Rye and Rye Harbour, whilst also minimising

and managing flood risk, including in relation to the location of new development in accordance with

other criteria;

Promote at least 10,000 sq m of employment floorspace at Rye Harbour Road industrial estate to

promote economic regeneration and job creation.

Contribution to Cumulative Effects

Planned housing and employment development in Rother will contribute to community wellbeing by

providing jobs and homes to meet the needs of local communities. It will also contribute to increased

greenhouse gas emissions. Planned housing and economic growth at Rye and Rye Harbour will add to

demand for space on the local road network. This will be offset to some degree by planned improvements

to the transport network and promotion of more sustainable modes of transport.

Relevant minerals site: M2

Local Transport Plan 3 2011-2026, East Sussex County Council, June 2011

The key priorities in Rye are to:

work with Rother District Council to identify improvements to transport infrastructure to support

sustainable development in Rye which emerges through the LDF,

focus on improvements on safe, coherent walking and cycling routes on key routes/corridors in Rye,

focus on improvements to public transport on key routes and corridors in Rye.

Contribution to Cumulative Effects

The Plan will help to mitigate the demand for road space associated with the planned housing and economic

growth in Rye, easing pressure on the network. In Rye, measures will help to reduce greenhouse gas

emissions.

Relevant minerals site: M2

New London Plan – Consultation Draft, London Assembly, December 2017

The draft Plan identifies the following Opportunity Areas:

Thamesmead and Abbey Wood: 8000 new homes and 4000 new jobs. Alongside the opening of the

Elizabeth Line in December 2018, major investments in transport infrastructure such as the proposed

DLR extension from Gallions Reach are also needed to support high density development and provide

access to areas of significant employment growth.

Bexley Riverside: 6000 new homes and 19,000 new jobs. The Bexley Riverside Opportunity Area

stretches along the south side of the Thames and includes the areas of Belvedere, Erith, Slade Green

and Crayford. Future improvements to accessibility through better services on the existing transport

network, and the extension of the Elizabeth Line to Slade Green and beyond, offer the opportunity for

significant redevelopment around the stations. The Mayor will support the borough and the adjoining

Kent authorities in seeking a Government-led extension of the Elizabeth Line. In the interim, within

London, the Planning Framework should explore the level of growth that could be supported through

significantly enhanced bus services and priority measures.

The Mayor will work with WSE partners to find solutions to shared strategic concerns such as: barriers to

housing and infrastructure delivery; factors that influence economic prosperity; the need to tackle climate

change (including water management and flood risk); improvements to the environment (including air

quality) and waste management (including the promotion of Circular Economies); wider needs for freight,

logistics and port facilities; and scope for the substitution of business and industrial capacity where mutual

benefits can be achieved.

Contribution to Cumulative Effects

Planned housing and employment growth will contribute to community wellbeing by providing jobs and

homes to meet the needs of local communities. It will also contribute to increased greenhouse gas

emissions. Planned housing and economic growth at Bexley Riverside, and to a lesser extent, at

Thamesmead and Abbey Wood, may create additional pressures on the road network in Dartford, although

measures are planned to make improvements to infrastructure and promote more sustainable modes of

traffic which will help to reduce the additional pressure that planned levels of development will bring on the

road network.

Relevant minerals sites: M7, M11

Minerals and Waste Local Plan 2013-30, Kent County Council, July 2016

The proposed extension areas for Norwood Quarry and Landfill Site, Isle of Sheppey are together identified

as the Strategic Site for Waste in Kent. The site of the proposed Medway Cement Works, Holborough and

its permitted mineral reserves are together identified as the Strategic Site for Minerals in Kent.

Sites that have permanent planning permission for waste management, or are allocated in the Waste Sites

Plan are safeguarded from being developed for non waste management uses. A non-hazardous treatment

site is located in Dartford, as well as at other locations around the county.

Facilities for the storage and/or management of radioactive waste will be acceptable within the Nuclear

Licensed area at Dungeness where this is consistent with the national strategy for managing radioactive

waste and discharges and the outcome of environmental assessments justify it being managed on site.

The Plan lists a large number of existing operational and inactive waste and minerals sites. Some of these

could contribute to cumulative effects in combination with sites in the MSP.

Contribution to Cumulative Effects

The following sites have the potential to contribute to cumulative effects in combination with mineral sites

in the MSP. In most cases the impacts are most likely to be on the road network, with the potential for

adverse effects on air quality, congestion and amenity for communities in the vicinity of the roads.

However, it is also possible that where existing sites are very close to sites in the MSP, the cumulative

effects could arise from the combined impacts from operations on the site. This could affect the amenity of

people living in or visiting the local communities through noise, dust, visual impacts and light. There could be similar cumulative impacts on biodiversity in the locality.

Site ref	Name	Туре	Relevant minerals site
	Medway Works, Holborough	Strategic minerals site, chalk/cement	M8
50	Joyce Green Quarry	Sand and gravel	M7, M11
81	East Peckham Quarry	Sand and gravel, inert landfill	M10, M13
94	Addington Sand Pit	Industrial sand	M8
15	Lenham Quarry	Building sand, inert landfill	M3
133	Scotney Court Quarry	Sand and gravel	M2
143	Denge Quarry	Sand and gravel	M2
155	Aylesford Quarry	Sand and gravel	M8
	Burleign Farm, Charing		
	Quarry		
870	Ham Hill Quarry	Secondary and recycled aggregates	M8
865	Land at Sanderson Way	Secondary and recycled aggregates	M12
478	Littlebrook Oil Management Unit	Transfer station	M7, M11
449	Fre-mell Farm, Comp Lane,	Metal/end-of-life vehicle facility	M8
	Offham		
482	Dengemarsh Road, Lydd	Metal/end-of-life vehicle facility	M2
647	Countrystyle Depot, Lenham	CD&E recycling	M3

Management of waste at Dungeness is for waste generated on site and therefore is unlikely to give rise to cumulative effects.

Partial Review of the Kent Minerals and Waste Local Plan 2013-30, Kent County Council, December 2018

The adopted Plan identifies a shortfall in capacity of the following types over the Plan period (to 2030):

- Waste recovery capacity energy from waste and organic waste treatment;
- Hazardous waste (due to the identified need for additional capacity to allow for the continued landfilling of asbestos);
- Disposal of Dredgings.

As a consequence, policies CSW7, CSW8, CSW 12 and CSW 14 state that a Waste Sites Plan will be prepared that will identify sites suitable for accommodating facilities needed to address the identified capacity shortfalls. A review of the future needs for waste management facilities in Kent has recently

been undertaken and this has concluded that there is now no need for the development of this additional capacity.

Encouraging more waste to be managed via re-use or recycling will be achieved by enabling policies for the development of waste management facilities for recycling and processing including a policy to grant planning permission for redevelopment or extensions to existing waste management facilities to enable more waste to be recycled or processed for re-use providing the facility's overall throughput is not increased.

Sections 5.5, 5.6, and 5.7 of the adopted Kent Minerals and Waste Local Plan (KMWLP) set out policies (CSM5, CSM6 and CSM7), with reasoned justification, for the safeguarding of:

- Land-won minerals (as defined in the Minerals Safeguarding Areas (MSAs)) from needless sterilisation from other development; and,
- Minerals supply and waste management and transport infrastructure from direct, and potential, loss due to incompatible development being sited nearby such that it has the potential to prejudice their future lawful operation.

Further policies, DM 7 and DM 8, are included to ensure that the safeguarding is not unduly rigid in its application. Policies DM7 and DM8 set out criteria to allow development that may affect safeguarded sites to proceed in certain prescribed circumstances.

Contribution to Cumulative Effects

None.



Kent County Council Equality Analysis/ Impact Assessment (EqIA) Kent Minerals and Waste Local Plan (KMWLP) 2013-30 Early Partial Review of the KMWLP 2018

Directorate/ Service: Growth, Environment and Transport Directorate; Environment, Planning & Enforcement

Name of decision, policy, procedure, project or service: Kent Minerals and Waste Local Plan (KMWLP) 2013-30, Early Partial Review of the KMWLP 2018

Responsible Owner/ Senior Officer: Katie Stewart, Director of Environment, Planning & Enforcement

Version: Version 1

Author: Sharon Thompson, Head of Planning Applications

Pathway of Equality Analysis: Environment and Transport Cabinet Committee, Cabinet Committee, County Council

Summary and recommendations of equality analysis/impact assessment.

Context

The production of a Minerals and Waste Local Plan is a statutory requirement for the County Council as a Local Planning Authority. It forms the policy basis for decision making by the County Council in determining planning applications for proposed minerals and waste management development and mineral and waste safeguarding considerations for the District/Bough Councils in determining non-mineral development.

The KMWLP was adopted by the County Council in July 2016 following external examination by a Government appointed Planning Inspector. The Plan sets out the strategy for sustainable mineral supply and waste management in the County of Kent in accordance with Government advice and planning law and guidance and requires monitoring of the effectiveness of its policies. The KMWLP committed the County Council to prepare a Waste Sites Plan to meet the needs identified in the adopted Plan. Monitoring of the effectiveness of the KMWLP and significant additional waste capacity being developed within the County since the adoption of the KMWLP has led to the need for an early partial review of the KMWLP. This review work has concluded that a Waste Sites Plan is no longer required and that changes are required to the safeguarding policies to improve their effectiveness and that revisions are required to the Plan to bring effect to the changes.

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Aims and Objectives

The Plan making process has identified the need for an early partial policy review of waste needs and safeguarding matters. This will ensure that mineral and waste management development within the County is sustainable and meets legislative requirements. It will also ensure that planning decisions have a robust policy base and that they are taken in the wider public interest.

Monitoring of the KMWLP has identified significant changes in circumstances post adoption in respect of waste supply and mineral and waste safeguarding that indicate various policies are no longer robust for planning decisions. As a result, these policies and explanatory text are to be revised in the Early Partial Review of the KMWLP. Details are set out in the Pre-Submission Draft of the KMWLP - Early Partial; Review 2018 and the supporting evidence base.

In summary, the Early partial Review proposes: modifications in the following areas:

A. Waste management:

- The strategy for provision of future waste management capacity
- The identification of site allocations for waste management facilities there is no longer a need for a sites plan.
- B. Safeguarding The approach to safeguarding mineral resources and waste management and minerals supply infrastructure.

The detail of the proposed changes is set out in the Pre-Submission Draft - Early Partial Review of the Kent Minerals and Waste Local Plan 2018.

A key driver for the review of waste requirements was the implementation of a planning permission for a significant new waste recovery facility at Kemsley which meant that the amount of existing waste management capacity used to inform the approach in the KMWLP was no longer robust.

Overall, the review of waste requirements indicated that there was no need for additional waste recovery capacity and that there was insufficient justification for a Waste Sites Plan. As a result, changes to a number of the adopted KMWLP waste policies and explanatory text are required to remove the commitment to identify sites within a separate Waste Sites Plan. This will help ensure that there is no over-supply of recovery capacity within Kent. A change to adopted policies can only be realised via modifications which the County Council is statutorily obliged to publish for representations and then submit to the Secretary of State for independent examination.

Minerals and Waste Safeguarding

Generally, it is considered that the KMWLP is performing as intended; however, in relation to the safeguarding of mineral resources and minerals Updated 20/11/2018 2

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and waste management infrastructure. Implementation of the safeguarding policies DM 7 and DM 8 has revealed an ambiguity that means the policies are not being implemented wholly as intended in respect of allocated sites in Districts' Local Plans.

The intention of these safeguarding policies is to ensure that development on sites for non-mineral development (i.e. housing and commercial) allocated in a Borough or District Local Plan would be exempt from the KMWLP's safeguarding provisions if the need to safeguard any mineral resource underlying the site, and/or proximate minerals and waste infrastructure, had been assessed and factored into the decision to allocate the sites. In practice, however, there have been occasions where the policies are being interpreted to exclude any site allocations in adopted development plans from the safeguarding process, regardless of whether minerals and waste safeguarding matters were considered during the site allocation process. This is not the intention of the policies, nor national policy guidance, and it has the potential to undermine the effectiveness of these policies. The Early Partial Review provides the opportunity to address this matter.

Proposed minor changes to policies DM7 and DM8, as well as supporting text to ensure that the safeguarding intention of the KMWLP is effective was the subject of public consultation between December 2017 and March 2018

Summary of Impact Assessment

The policy review work and the proposed changes to the MWLP are neutral in the equality impact assessment on any one protected group. The purpose of the Plan is to provide a framework for determining planning applications, which are required to be determined in the public interest. The policy review work is unlikely to have a specific impact, either positive or negative, on any of the protected groups identified below to any lesser or greater extent than the general population. In determining planning applications and interpreting the proposed changes to policy, these are determined in the context of the development plan, planning policy and guidance and material planning considerations relevant to applications on a case by case basis. The impacts in respect of protected groups will be considered again in the context of individual sites. Monitoring of the KMWLP is undertaken annually and provides contextual data on Kent's population. This work is used to monitor the effectiveness of the Plan's policy, including its impact upon the equality protected characteristics.

Summary of Equality Impact

It is reasonable to conclude that as any exercise in Plan making and Plan review leads ultimately to a certain amount of new or safeguarded development. Therefore, there is arguably a degree of low overall negative impact in the outcome of this assessment, as all development can have some negative impact on the wider environment and communities within it. There will also be balancing competing planning interests such as increased Updated 20/11/2018

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sustainability in waste management and mineral supply. Overall, the partial review of the Plan's safeguarding and waste policies is unlikely to have a specific impact, either positive or negative on any of the protected groups identified below to any lesser or greater extent than the general population. On this basis a Part 2 full equality impact assessment is not required.

Adverse Equality Impact Rating Low - See table below

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment for the Minerals Sites Plan Options Consultation. I agree with risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

Head of Service

Signed: Sharon Thompson

Job Title: Head of Planning applications Date: 20th November 2018

DMT Member

Signed: Katie Stewart

Job Title: Director of Growth, Environment and Transport

Updated 20/11/2018

Part 1 Screening

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.					
-	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence		
Age				Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.		
				A more robust safeguarding of aggregate supply will allow for the materials to be available for new and maintained highway infrastructure for access, homes, retirement homes, schools, health infrastructure and children's centres, resulting in a potentially positive impact for this protected characteristic.		

Disability	rea at the si a apply the composition of the side of t	Removing the need for a waste sites plan will esult in potential sites not being allocated and potential reduction of negative impacts on his protected characteristic, in the event that ites had come forward. If more robust safeguarding of aggregate upply will allow for the materials to be available for new and maintained roads and eavements for access, wheelchair adaptable somes, care homes, schools, community entres and health infrastructure, resulting in a sotentially positive impact for this protected characteristic. Policy DM 11 Health and Amenity of the Kent Minerals and Waste Local Plan 2013-30 equires all mineral development planning applications to address any impacts on matters nat would affect the interests of this identified froup.
Gender	re a tr	Removing the need for a waste sites plan will esult in potential sites not being allocated and potential reduction of negative impacts on his protected characteristic, in the event that ites had come forward.
Gender identity/ Transgender	re a	Removing the need for a waste sites plan will esult in potential sites not being allocated and potential reduction of negative impacts on his protected characteristic, in the event that

	sites had come forward.
	A more robust safeguarding of aggregate supply will allow for the materials to be available for new hospitals, roads for access and community centres, resulting in a potentially positive impact for this protected characteristic. Policy DM 11 Health and Amenity of the Kent Minerals and Waste Local Plan 2013-30 requires all mineral development planning applications to address any impacts on matters that would affect the interests of this identified group.
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Race	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.
Religion and Belief	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.
	A more robust safeguarding of aggregate supply will allow for the materials to be available for new and maintained roads for access, places of worship and community

	centres, resulting in a potentially positive impact for this protected characteristic.
Sexual Orientation	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.
Pregnancy and Maternity	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward. A more robust safeguarding of aggregate supply will allow for the materials to be available for new and maintained roads for access, health infrastructure and community centres, resulting in a potentially positive impact for this protected characteristic. Policy DM 11 Health and Amenity of the Kent Minerals and Waste Local Plan 2013-30 requires all mineral development planning applications to address any impacts on matters that would affect pregnancy and maternity interests of any identified groups.
Marriage and Civil Partnerships	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.

Carer's Responsibilities	Removing the need for a waste sites plan will result in potential sites not being allocated and a potential reduction of negative impacts on this protected characteristic, in the event that sites had come forward.
	A more robust safeguarding of aggregate supply will allow for the materials to be available for new and maintained roads for access, hospitals and community centres, resulting in a potentially positive impact for this protected characteristic.
	Policy DM 11 Health and Amenity of the Kent Minerals and Waste Local Plan 2013-30 requires all mineral development planning applications to address any impacts on matters that would affect Carer's Responsibilities of any identified groups.

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Kent County Council Equality Analysis/ Impact Assessment (EqIA) Kent Minerals and Waste Local Plan (KMWLP) 2013-30 Kent Minerals Sites Plan 2018

Directorate/ Service: Growth, Environment and Transport Directorate; Environment, Planning & Enforcement

Name of decision, policy, procedure, project or service: Kent Mineral Sites Plan 2019-30 (the Plan)

Responsible Owner/ Senior Officer: Katie Stewart, Director of Environment, Planning & Enforcement

Version: Version 1

Author: Sharon Thompson, Head of Planning Applications

Pathway of Equality Analysis: E&T Cabinet Committee, Cabinet Committee, County

Council

Summary and recommendations of equality analysis/impact assessment.

Context

The production of a Minerals and Waste Local Plan is a statutory requirement for the County Council as a Local Planning Authority. It forms the policy basis for decision making by the County Council in determining planning applications for proposed minerals and waste management development and mineral safeguarding for the District/Bough Councils.

The KMWLP was adopted by the County Council in July 2016 following external examination by a Government appointed Planning Inspector. The Plan sets out the strategy for sustainable mineral supply and waste management in the County of Kent in accordance with Government advice and planning law and guidance. It requires sites to be identified and brought forward in a Sites Plan to realise the adopted KMWLP's Objectives. The KMWLP was accompanied by an agreed EQUIA. In adopting the assessment, it was recognised that further assessment would be required for the Sites Plans and that this work would be subject to wider consultation and independent examination appointment by the Secretary of State.

Aims and Objectives

This next stage of the Plan Making process includes the preparation of a Mineral Sites Plan. This will ensure that mineral and waste management development within the County is sustainable and meets legislative requirements. The Mineral Sites Plan will form part of the adopted Kent Minerals and Waste Local Plan 2013-30 (KMWLP) that identifies the sites required to deliver the objectives of the adopted KMWLP strategy for a steady and

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adequate supply of aggregates to meet the objectively identified needs for Kent over the adopted Plan period. This EqIA has been conducted to comply with the County Council's statutory obligations to ensure equality impact issues have been properly assessed

Minerals Sites Plan Options Consultation

The identification of potentially economically important mineral sites to meet the requirements of the KMWLP is highly dependent on the geographical distribution of the economic geology of Kent; along with the promotion and deliverability of potential mineral sites by landowners and operators to meet the requirements. Site allocation is undertaken in accordance with an agreed site methodology and recognised best practice.

Public Consultation

The options document identifying potential sites for future development and the partial review of the KMWLP was subject to public consultation in accordance with the Council's Statement of Community Involvement (SCI) and statutory planning requirements (Regulation 18). Community engagement is an important part of the plan making and planning application process, with opportunities for engagement and consideration against the protected characteristics, amongst other planning matters. A variety of different methods has and been used to disseminate information and to encourage participation.

Summary of Impact Assessment

The emerging Mineral Sites Plan are neutral in the equality impact assessment on any one protected group. The purpose of the Plan is to provide a framework for determining planning applications, which are required to be determined in the public interest. The emerging Mineral Sites Plan are unlikely to have a specific impact, either positive or negative, on any of the protected groups identified below to any lesser or greater extent than the general population. The Sites Plan will have no direct physical effect until such time as proposed development is granted permission and development commences. As part of the planning application process, there is a further requirement to conduct public consultation and have regard to responses made. Monitoring of the KMWLP is undertaken annually and provides contextual data on Kent's population. This work is used to monitor the effectiveness of the Plan's policy, including its impact upon the equality protected characteristics.

Summary of equality impact

It is reasonable to conclude that as any exercise in Plan making leads ultimately to a certain amount of new development. Therefore, there is arguably a degree of low overall negative or positive impact in the outcome of this assessment, as all development has some negative or positive impact on the wider environment and communities within it. There will also be balancing competing planning interests such as increased sustainability in waste management and mineral supply.

Overall, the preparation of the Mineral Sites Plan Options document is unlikely to have a significant impact, either positive or negative on any of the protected groups identified below to any lesser or greater extent than the general population. On this basis a Part 2 full equality impact assessment is not required.

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Adverse Equality Impact Rating Low

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning the Early Partial Review of the Kent Minerals and Waste Local Plan 2018 and the Kent Minerals Sites Plan 2108. I agree with risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

Head of Service

Signed: Katie Stewart

Job Title: **Director** Date: 20/11/2018

DMT Member

Signed: **Sharon Thompson**

Job Title: **Head of Planning Applications** Date: 20/11/2018

Part 1 Screening

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Protected Group	Please provide a brief commentary on your findings. Fuller analysis should be undertaken in Part 2.							
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence				
Age			Vulnerable adults, elderly or children, as part of this protected characteristic, could be negatively affected by the increase in pollution in the local area to the allocated sites. At the planning application stage, mitigations will be put in place to reduce the risk of this, resulting in a low overall latent risk.	The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable new and maintained highways infrastructure for access, homes, retirement homes, schools and children's centres, resulting in a potentially positive impact for this protected characteristic.				
Disability			This may result in a low negative impact as those with this protected characteristic may be more vulnerable to the latent risk of pollution etc, however mitigations will be used at the planning application stage to minimise this, in line with Policy DM 11 Health and Amenity of	The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable new and maintained highways infrastructure and pavements for access, wheelchair adaptable homes, care homes, schools and community centres, resulting in a potentially positive impact for this protected characteristic.				

	the Kent Minerals and Waste Local Plan 2013-30 which requires all mineral development planning applications to address any impacts on matters that would affect disability of any identified groups.	
Gender		N/A
Gender identity/ Transgender		The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable needed development to come forward which would help this protected characteristic enabling continued and increasing the facilitation of access to community and health services, employment opportunities and accommodation needs.
Race		N/A
Religion and Belief	This may result in a low negative impact on worshipers local to sites identified in the Sites Plan. Those with this protected characteristic could be negatively affected by the increase in pollution in the local area of places of worship close to the allocated sites. At the planning	The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable new and maintained roads for access, places of worship and community centres, resulting in a potentially positive impact for this protected characteristic.

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Sexual Orientation	application stage, mitigations will be put in place to reduce the risk of this, resulting in a low overall latent risk.	N/A
Pregnancy and Maternity		The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable new and maintained highways infrastructure for access, hospitals and community centres, resulting in a potentially positive impact for this protected characteristic.
Marriage and Civil Partnerships		N/A
Carer's Responsibilities	This may result in a low negative impact on Carers local to sites identified in the Sites Plan. Those with this protected characteristic could be negatively affected by the increase in pollution in the local area close to the allocated sites. At the planning application stage, mitigations will be put in place to reduce the risk of this, resulting in a low	The supply of the appropriate type and amount of aggregate minerals will enable more efficient maintenance of the infrastructure and provide the right amount of materials to enable new and maintained hospitals, roads for access, and community centres, resulting in a potentially positive impact for this protected characteristic. to come forward.

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		overall latent risk.	
		Policy DM 11 Health and Amenity of the	
		Kent Minerals and	
		Waste Local Plan	
		2013-30 requires all	
		mineral development	
		planning applications to	
		address any impacts on	
		matters that would	
		affect identified groups	
		dependant on care	
		provision.	

From: Mike Whiting, Cabinet Member for Planning, Highways, Transport

and Waste

Barbara Cooper, Corporate Director of Growth, Environment and

Transport

To: Environment & Transport Cabinet Committee – 28th November 2018

Subject: Kent & Medway Energy & Low Emissions Strategy – Emerging

evidence and priorities

Classification: Unrestricted

Electoral Division: All

Summary:

This report provides an update on the development of a Kent and Medway Energy and Low Emissions Strategy, as well as an update on the emerging priorities within the TRI-LEP Energy Strategy to which the Kent and Medway Strategy will contribute.

Recommendation(s):

The Environment and Transport Cabinet Committee is asked to consider and make recommendations to the Cabinet Member for Planning, Highways, Transport and Waste as to the:

- 1. Progress in and proposed timelines for the development of the Strategy; and
- **2.** The Themes and Project Models proposed in the TRI-LEP Energy Strategy outlined in Section 3, and their relevance to the Kent and Medway Strategy.

1. Introduction

- 1.1 In November 2017, Kent & Medway Chief Executives and Leaders endorsed the need for a Kent and Medway Energy & Low Emissions Strategy (ELES), as a daughter strategy to the Kent Environment Strategy, with KCC taking the lead in coordinating its development collectively with Medway Council, Kent Districts and other key partners.
- 1.2 This paper is a further update to the paper presented to this Cabinet Committee on 20th September 2018. The work to date that informs this paper has been and will continue to be shaped by the Kent Environment Strategy Cross Party Members Group that meets every six weeks.
- 2. Background Kent and Medway Energy and Low Emissions Strategy Purpose and Aims
- 2.1 The Strategy will develop a multi-agency approach towards a more sustainable energy infrastructure across Kent and Medway as well as improving air quality, reducing carbon emissions.

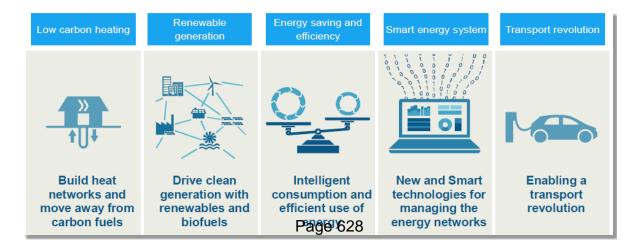
 Page 627

- 2.2 The Strategy will utilise available data and evidence of good practice to identify the most effective partnership actions to achieve a step change in delivery, targeting existing resources more effectively, securing new funding and increasing collaboration across partners.
- 2.3 Following extensive stakeholder engagement with the data gathered to date, five themes and potential options for non-technological actions have emerged. These options were shared with the Cabinet Committee in September to gather members' views and comments. The five themes that have been identified are:
 - Leadership and Governance
 - Evidence and Intelligence
 - Policy, Planning and Guidance
 - Financing and Investment
 - Communications and Engagement
- 2.4 Further detail of the proposed themes and actions presented at the 20 September Committee have been are provided in **Appendix 1** for reference. These themes and actions are being developed and refined together with consideration of technological interventions from the TRILEP Energy Strategy, for inclusion in the final draft Kent and Medway Strategy that will be presented to this Cabinet Committee in the new year.

3.0 TRI-LEP Energy Strategy -Technological Interventions

- 3.1 As background, in parallel, BEIS requested and provided the funding to all Local Enterprise Partnerships (LEPs) to produce Local Energy Strategies, which should provide a clear analysis of the local opportunities and challenges across heat, transport and power.
- 3.2 In response to this initiative, the Southeast Local Enterprise Partnership (SELEP) have partnered with Coast to Capital and Enterprise M3, to develop an ambitious strategy and potential technological project interventions that will be scalable across the geography to increase impact and investment and develop cross-LEP working, including Kent and Medway. The five emerging draft Themes and 18 tecnological project model interventions identified are shown in **Figure 1** and **Table 1** below. The full Draft TRI-LEP strategy is available on request.

Figure 1: Themes



- 3.3 Kent have been a key actor in developing this strategy, participating on the Steering Group and the majority of the interventions will be relevant for implementation in Kent and Medway.
- 3.4 The next steps for Kent and Medway in the development of the Tri-LEP Strategy will be to review the 18 Project Models and prioritise those areas to include in the Kent and Medway Energy and Low Emissions Strategy. This prioritisation will be carried out in consulation with key stakeholders and the Cross Party Members Group.

Table 1: Technological Interventions

Five Priority Themes	Project Models
Low carbon heating	 #1 District Heat Networks rollout #2 Off-gas grid homes #3 Hydrogen injection into the Natural Gas grid #16 New-build homes on hydrogen grid
Energy saving and efficiency	 #2 Off-gas grid homes #9 Energy Efficiency in homes #10 SME Support Programme
Renewable generation	 #4 Offshore wind development #5 Solar and microgrid on landfill sites #6 Biomass fuel supply chain development #7 Solar energy for Network Rail #8 Car parks - solar potential #17 Biofuel evolution

Smart energy system	 #5 Solar and microgrid on landfill sites #11 New housing smart microgrids #12 EV charging & hydrogen-fuelling infrastructure #15 Setup of ESCO / MUSCO infrastructure #18 Support developments in CO2 capture
Transport revolution	 #12 EV charging & hydrogen-fuelling infrastructure #13 CNG fleet fuelling #14 Ports - modernisation of port energy infrastructures

4. Financial Implications

4.1 As stated in the September report to Cabinet Committee, at this early stage, specific costed measures are not yet defined. As the priorities and action plan for the Strategy develops, the supporting evidence and any cost implications of specific actions will become clearer.

5. Policy Framework

5.1 This paper and the activity within it is directly linked to KCC Strategic Outcomes and to the Kent Environment Strategy and its Implementation Plan. It is also relevant to the emerging Health and Wellbeing Strategy and Kent's Public Health Outcomes. Further details are provided in the earlier paper.

6. Equalities Impact Assessment

An Equalities Impact Assessment was also included in the earlier paper. At this stage there are no significant negative impacts. As this Strategy is aimed at improving health outcomes, there is more likely to be more positive equality impacts than negative, particularly for Age, Maternity and Disability. As more evidence becomes available and priorities become more defined, impacts will be re-assessed to determine if this assessment requires revision.

7. Conclusions

- 7.1 Work with stakeholders has further strengthened the business case for public sector intervention in this critical agenda, and by extension for the development of the Kent and Medway Energy and Low Emissions Strategy.
- 7.2 In the meantime, the work that has been undertaken to simultaneously co-develop the Tri-LEP Energy Strategy is an important step forward in maximising the opportunity for Kent and Medway to not only shape its own future in this agenda, but to influence the wider Southeast picture.

8. Next Steps and Timescales

8.1 It is the aim to bring back a final draft for consultation to Cabinet Committee in the New Year. The final draft will go out for public consultation in late spring 2019 for 12 weeks with the final version completed by Autumn 2019.

9. Recommendation(s)

Recommendation(s):

The Environment and Transport Cabinet Committee is asked to consider and make recommendations to the Cabinet Member for Planning, Highways, Transport and Waste as to the:

- 1. Progress in and proposed timelines for the development of the ELES Strategy; and
- **2.** The themes and project models proposed in the TRI-LEP Energy Strategy outlined in Section 3, and their relevance to the Kent ELES Strategy

8. Background Documents

Kent Environment Strategy - <u>www.kent.gov.uk/environmentstrategy</u>

Paper presented to Environment & Transport Cabinet Committee Jan 2018 https://democracy.kent.gov.uk/documents/s82600/ltem%206%20-%20Report%20-%20Kent%20Environment%20Strategy%20Progress%20Energy%20and%20Air%20Quality.pdf

9. Contact details

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Relevant Director:

Katie Stewart, Director, Environment Planning and Enforcement 03000 418827

katie.stewart@kent.gov.uk

Appendix 1 Key Themes and Actions

Leadership and Governance

If real progress is to be made locally in setting a framework for change on emissions and energy infrastructure, strong leadership will be critical. Given the role of development and transport in these agendas, it is therefore logical that local authorities – at county, unitary and district/borough levels – provide this leadership. Potential actions include:

- More visible joint lobbying of Central Government and business with key partners.
- Kent/KCC being a stronger advocate for energy and low emissions on the Local Enterprise Partnership (LEP) and Transport for the Southeast Subnational Transport Boards – taking the lead in promoting LEP-wide initiatives to reduce emissions and promote sustainable energy solutions where appropriate.
- In respect of commissioning and procurement, encouraging or requiring the use clean growth solutions within contracts for services; capital projects commissioned; corporate and Kent strategies and initiatives; and new build design standards for KCC buildings
- Development of a Kent and Medway-wide public sector estate improvement programme. Organisations like KCC, Medway Council and districts playing a leading role in the development of future energy systems through estate energy use and generation, requiring smart, efficient and innovative energy solutions in public sectorowned and managed buildings.
- Taking more of a leading role in facilitating future Kent energy infrastructure, e.g. decentralised energy, EV/alternative fuel vehicle roll out, smart networks.
- Exploring how we reduce emissions from staff travel to incentivise, promote and provide the infrastructure for low emission transport and active travel options, for commuting and business travel and sharing these concepts with the district authorities

Evidence and Intelligence

The current levels and trends in energy and fuel consumption and resultant emissions are clearly set out at national and regional level; however, there is less data and evidence available at district level, where more targeted interventions might be necessary. This includes a lack of consistent monitoring, and a lack of robust case studies, which development planning can reference and use to develop policy, meaning local authorities are less able to press developers to implement more innovative technologies and solutions to achieve higher levels of sustainability.

It is proposed that the strategy considers building more robust evidence and intelligence to support the delivery of the strategy and the development of effective planning policies. The potential actions to be considered are:

- A more comprehensive evidence base across Kent and Medway to inform future action
- Integration of energy, carbon and air quality data/evidence into future iterations of the Kent and Medway GIF.

- Provision of more accessible and relevant travel and public health information for the public to make more sustainable and healtheir choices.
- Greater engagement with local universities and the research community to pilot and evaluate innovative approaches and gather intelligence to:
 - Deliver robust case studies to demonstrate 'what works' and to underpin planning.
 - Provide the evidence needed to effectively lobby Government for stronger national policies and to successfully bid for grant funding.

Policy, Planning and Guidance

Planning policy is a critical enabler in delivering a step change to support clean growth. A consistent message from stakeholders confirms there is a disparity between the clean growth ambitions of the Government and the ability of local authorities, particularly local planning authorities, to deliver those ambitions. It should be noted that previous changes in national policy and planning have removed helpful standards such as the Code for Sustainable Homes and as yet there are no common standards for critical national infrastructure such as for electric vehicles. The potential actions to be considered are:

- Development where appropriate of common planning policies for new developments which could cover
 - A requirement for Energy Statements for housing over a certain threshold to encourage decentralised energy and renewables
 - A requirement for performance above Building Regulations in some contexts or circumstances
 - The provision of EV charging points (and provision for alternative vehicle fuels) on new developments
 - o The provision of sustainable and active travel options on new developments
- Development of guidance or standards for certain licencing, which could include taxis, private rented accommodation (Landlords), commercial premise letting.
- Development of anti-idling policies for instance, for bus services, taxis, school drop
 off points, health facilities and similar circumstances or services where such idling is a
 particular issue.
- The exploration of the use of Clean Air Zones to deter use of old diesel buses, lorries and taxis

Financing and Investment

Ultimately critical to delivering action is funding, particularly for more sustainable transport and energy infrastructure, significant building improvements and new research. Some areas have achieved partnership success in accessing funding, for example for home energy efficiency improvements to reduce fuel poverty. This success needs to be replicated at scale to tackle air pollution and deliver wider energy action. The potential actions to be considered are:

- Increasing KCC and partners investment or support for community scale energy and smart grid projects including renewables, battery storage and EV infrastructure outside the KCC estate where a return exists.
- Explore the development of a potential Kent and Medway-wide Energy and Low Emissions investment fund to support implementation at scale, linking to existing mechanisms such as the Local Growth Fund and the Regional Growth Fund for businesses

Communications and Engagement

Local authorities have a key role to inform, promote and encourage behavioural change and the adoption of new technologies. There are already a number of existing initiatives; the intention would be to build on these to accelerate the pace of change. The potential actions to be considered include:

- More targeted information campaigns to reduce negative impacts e.g. vehicle idling around schools, care and hospital facilities and in town centres.
- More interactive information to be provided in order to:
 - Enable residents to take action to protect their health eg alternative walking/cycling/running routes to avoid high pollution areas at particular times
 - Encourage more active travel.
 - Work with districtes to establish and review local cycling policies

From: Mike Whiting, Cabinet Member for Planning, Highways,

Transport and Waste

Barbara Cooper, Corporate Director of Growth, Environment

and Transport

To: Environment and Transport Cabinet Committee – 28th

November 2018

Subject: Key Street and Grovehurst Road Junction Improvements,

A249

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: N/A

Electoral Division: All Swale Districts

Summary: This report provides an update on the Swale Transport Infrastructure proposals identified in a paper to this Committee on the Housing Infrastructure Fund in May 2018

Further works have been commissioned to develop the full business case which is due for submission on 1st March 2019 and this report is an update on progress on both the bid process and supporting design work.

Recommendation(s):

The Cabinet Committee is asked to note the progress made to date on the preparation of the full business case for submission to the Ministry of Housing, Communities and Local Government as part of the Housing Infrastructure Fund (HIF) bid process.

1. Introduction

- 1.1 The Expression of Interest submitted in September 2017 to the Ministry of Housing, Communities and Local Government (MHCLG)sought £40 million for improvements to two key junctions on the A249 in Swale, namely Key Street and Grovehurst Road, which would enable the delivery of over 6,000 homes in the period 2022 2031.
- 1.2 On 21st March 2018, the County Council received confirmation from MHCLG that it was one of 44 areas shortlisted with the next stage being the submission of a full business case by 1st March 2019.

- 1.3 As a result of this announcement, the Major Capital Programme Team commissioned the following pieces of work to build on the feasibility study undertaken by Amey in 2015:
 - Review of the feasibility design
 - Full topographical survey
 - New pedestrian, cyclist and traffic counts
 - Assessment of crash data over the previous 10-year period
- 1.4 A commission was also raised earlier in the year with Transport Consultants, Steer, to develop and take forward the Business Case to submission. Systra has been engaged to investigate design options for Grovehurst Road and to take forward the outline design for both this junction and Key Street. The current focus is to support and provide information to Steer for inclusion in the Business Case.
- 1.5 A Project Working Group has been set up that meets regularly to discuss the progression of the bid and includes representatives from:
 - KCC Major Projects and Development Planning
 - Swale Borough Council Planning
 - Highways England
 - A249 Route Management (Design, Build, Finance and Operate)
 - Consultants from Steer, Sweco and Systra
- In addition to the above working group, Homes England have provided a collaborative support network to assist with the development of the Business Case and the information required to ensure that it has the best possible outcome. As part of this collaborative network, officers from MHCLG, their consultants, DfT, Homes England and Highways England partake in monthly conference calls to discuss progress and have the role of "critical friend" providing us with comment/guidance on the development of the Business Case.
- 1.7 Comments from MHCLG have been positive to date and indications are that a strong case is being developed.

2. Financial Implications

- 2.1 It is intended that the HIF bid will cover all expenditure relating to the design, planning, procurement and construction of the two junctions and a request has been issued to Homes England for advance financial support to cover the Business Case development and outline design work. Section 106 monies are also to come forward from associated developments in the area and it is proposed that these contributions are recycled within the local area; a proposal that is supported by Homes England, MHCLG and Swale BC.
- 2.2 Revised costings have been provided for both junctions by an independent cost consultant and these are being updated. This may mean that the estimated costs exceed the original £40m stated in the Expression of Interest. Homes England has advised that if this were to transpire, it should

not be a barrier to the bid being successful provided all relevant sections of the Business Case are suitably evidenced and pass scrutiny.

- 2.3 The A249 from the M2 to Sheerness is managed under a Design, Build, Finance and Operate (DBFO) Contract with Highways England. As such, any amendments/improvements or additions that have an effect on the route will be subject to agreement by Highways England and the DBFO Contract and may have financial implications. There is 18 years remaining on the DBFO Contract and under the terms of the contract there may be either compensatory or commuted sum payments required to mitigate the removal of or addition to HE assets/network. Further to this, Highways England will be seeking commuted sums to cover any additional maintenance requirements post the DBFO contract.
- 2.4 Discussions are at an early stage whilst the design development is taking place and KCC has requested that the DBFO provide details of the information they will require to enable costings to be developed.
- 2.5 These costs could be prohibitive to the progression of the scheme and the potential timeframe to receive a decision may also have an adverse effect on the scheme programme. Every effort will be made, working closely with Highway England colleagues, to mitigate the impact and matters of concern will be escalated appropriately.

3. Scheme Options

3.1 Key Street

- 3.1.1 Two options were identified as being total or partial signalisation of the roundabout in conjunction with introduction of a new southbound slip road which would intersect with a roundabout on Chestnut Street, serving the proposed development of the adjacent land.
- 3.1.2 Testing of the options showed that the full signalisation of the roundabout would not achieve acceptable traffic flows or capacity. Partial signalisation (the north bound off slip) achieves much improved flows both now and in the future and as such, has been identified as the preferred option for this location.

3.2 Grovehurst Road

3.2.1 3 options have been considered:

- Construction of a new gyratory including a new overbridge, extensions to the A249 slip roads and complete removal of the existing "dumbbell" roundabout arrangement.
- Enlargement of the existing roundabouts and adjustments to the associated local road network/A249 slip roads
- Removal of the "dumbbell" roundabouts and replacement with a fully signalised junction along with associated amendments to the local road network and A249 slip roads

- 3.2.2 Testing and analysis has shown that the signalised junction simply does not work and does not provide any increased capacity or improvements to flows. The enlargement of the existing roundabouts as per bullet point 2 above, whilst potentially much cheaper, would not operate to the same level, providing reduced capacity and traffic flow.
- 3.2.3 The new gyratory has therefore been selected to take forward within the Business Case. Modelling has shown that this demonstrates the best solution to support the proposed increase in development and also, addresses the known congestion issues.
- 3.2.4 This approach was agreed at the latest Project Workshop meeting and there is further potential to signalise the gyratory beyond 2037 should the need arise. This was supported by Highways England. In general terms, both of the junction improvements not only assist to support and release development, they resolve long standing congestion issues on the A249 slip roads that routinely sees traffic queuing on to the main carriageway at peak hours.
- 3.2.5 In addition the DBFO representatives also recommended that a design compliant with the Design Manual for Roads and Bridges (DMRB)would be better supported than one which departs from known standards thereby limiting time delays and design risk. The outline design phase will routinely incorporate relevant KCC design standards those within the DMRB.

4. Legal implications

- 4.1 There is the potential for Legal Agreements to be entered in to in relation to the DBFO and this will be explored further during the design process.
- 4.2 The design of both junctions aims to improve accessibility for all users and a walking, cycling and horse-riding assessment will be undertaken following submission of the Business Case to MHCLG.

5. Risk assessment

5.1 Prior to the submission of the HIF bid on 1st March 2019, work will commence on an EqIA which will be informed by the outline design work which is due for completion in February 2019.

6. Conclusions

6.1 The two schemes identified will enable the medium to long term delivery of new homes on allocated sites within the Swale Borough Local Plan and unlocks development being held back by existing congestion and issues on the main A249.

7. Recommendation(s)

Recommendation(s): The Cabinet Committee is asked to note the progress made to date on the preparation of the full business case for submission to the Ministry of Housing, Communities and Local Government as part of the Housing Infrastructure Fund (HIF) bid process.

8. Background Documents

- 8.1 Appendix A Systra Workshop presentation September 2018
- 8.2 Appendix B Grovehurst Road feasibility
- 8.3 Appendix C Key Street feasibility

9. Contact details

Report Author

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- Andy.Moreton@kent.gov.uk

Relevant Director:

- Simon Jones, Highways, Transportation and Waste
- 03000 411683
- Simon.Jones@Kent.gov.uk





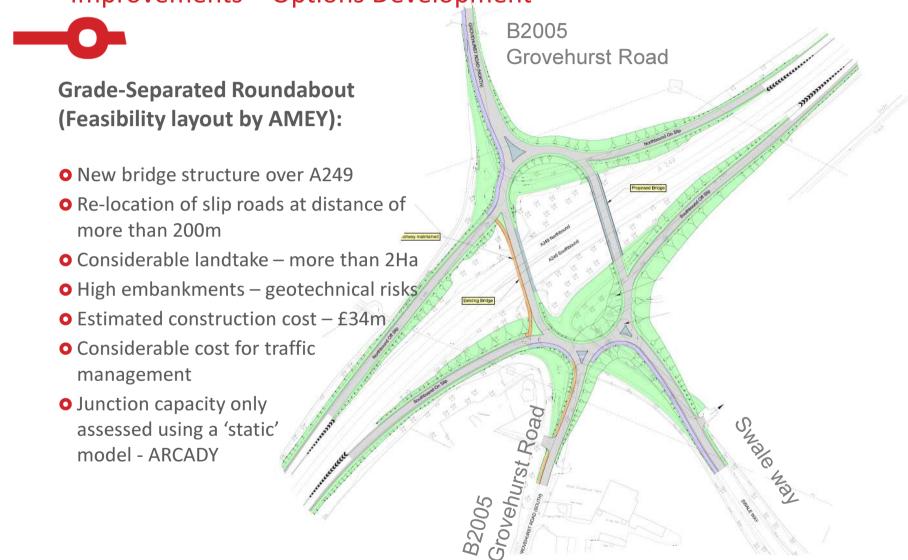
SYSTIA



SYSTRA scope:

- Task 1 Optioneering
 - Two more options to be developed in addition to Grade-Separated Roundabout layout, developed by AMEY
 - Option 1 modification of existing dumbbell RB junction, adding extra bypass lanes
 - Option 2 Diamond interchange signalised junctions
- Task 2 Traffic Modelling
 - VISSIM micro-modelling baseline coding
 - Calibration & validation of baseline model
 - Micro-modelling of three alternatives, including signal coordination
- Task 3 Submission of appraisal package to Kent CC and obtaining approval for preferred option
- Task 4 Outline Design of preferred option highway, pavement, drainage, street lighting & structure
- Task 5 Utilities, C3 enquiries
- Task 6 Stage 1 Road Safety Audit
- Task 7 Cost Estimate and submission of final package
- Principal Designer under CDM



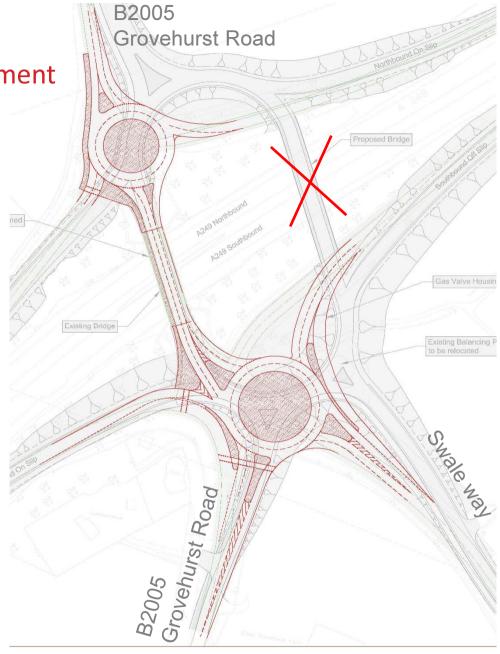






Option 1 – Dumbell Roundabout Key Geometric Elements:

- Re-location of circulatory carriageways
- Increased size of roundabouts
- Additional bypass lanes
- Re-arrangement of traffic lanes along A249 bridge (from 2 to 3)
- Existing slip roads are maintained
- Wide lanes to ease HGV manoeuvring
- Shared cycle/pedestrian provided through the junction and along bridge structure
- No extra bridge structure is required over A249

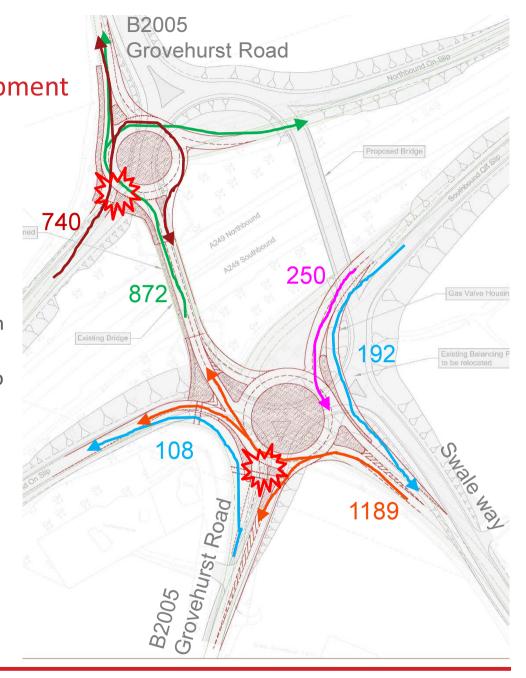






Option 1 – Dumbell Roundabout Traffic flows and capacity considerations:

- 2022 traffic PM peak 17.00-18.00 is heaviest
- Northbound off-slip is heavily trafficked, with more than 500 veh/h towards Swale Way
- Relatively Light traffic on Southbound off-slip lane
- Swale Way approach is busiest, entering traffic is not impeded by circulating traffic thus preventing vehicles from other approaches to enter
- Introduction of bypass lanes will reduce queues on RB approaches
- Unbalanced traffic flows are considered as a major contribution factor to capacity problems







Option 2- Signalised Junctions Key Geometric Elements:

 Requires re-arrangement of traffic lanes on existing A249 bridge (from 2 to 3)

Segregated left-turn lanes on all approaches

• Signal coordination with signal metering

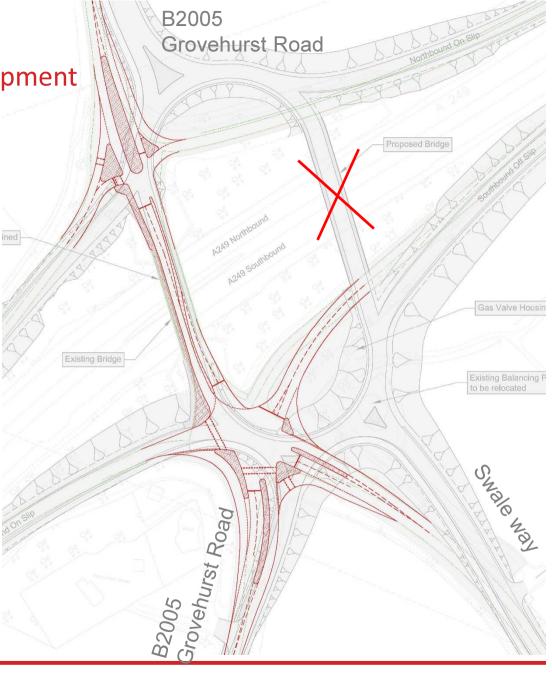
 Splitter islands to guide drivers and allow safe pedestrian / cyclists crossing

Alignment of slip roads almost the same

Minimal landtake

 Swept path for HGVs is checked and confirms suitability of proposed option

 Great reduction of landtake in comparison to grade-separated RB and dumbbell option`

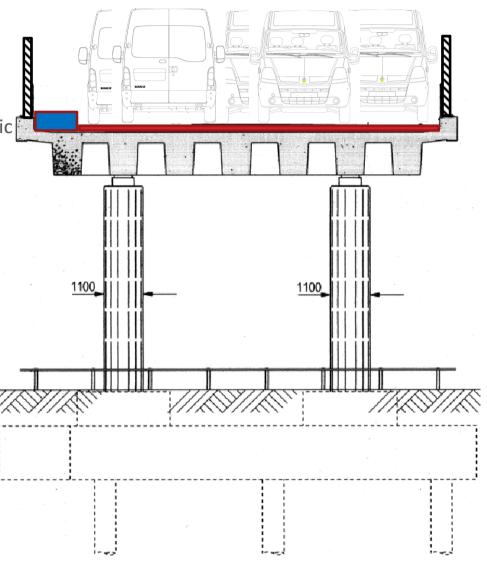






Structural assessment of existing Grovehurst Road Overbridge, structure No. 1858:

- Option 1 and 2 will require re-arrangement of traffic lanes. Shared pedestrian/cycle footpath will probably be with reduced width (Departure from standards?)
- Bridge parapets will be replaced and bridge deck assessment will be carried on
- Outline structural design will cover:
 - Form of construction of existing bridge
 - Vertical geometry of approaches and tie-ins to existing ground levels
 - Foundations;
 - Aesthetics;
 - Use of material and suitability with surroundings
 - Cost (whole life);
 - Buildability and ease of construction/access;
 - CDM aspects including risk assessment of maintenance





VISSIM micro-modelling:

- Baseline model network coding
- Flow matrices AM and PM peaks
- Route optimisation
- Baseline Model calibration and validation
- Modelling of proposed options (3 alternatives)
- Reporting
 - Journey time
 - Queue length
 - Options comparison
 - Conclusion and recommendations



A249 Grovehurst Junction Improvements – Options Development



Programme:

• Commission date: 10-Sept-2018

• Selection of preferred option for Business case application: 30-Nov-2018

• Project completion date: 08-Feb-2019 (Outline design)

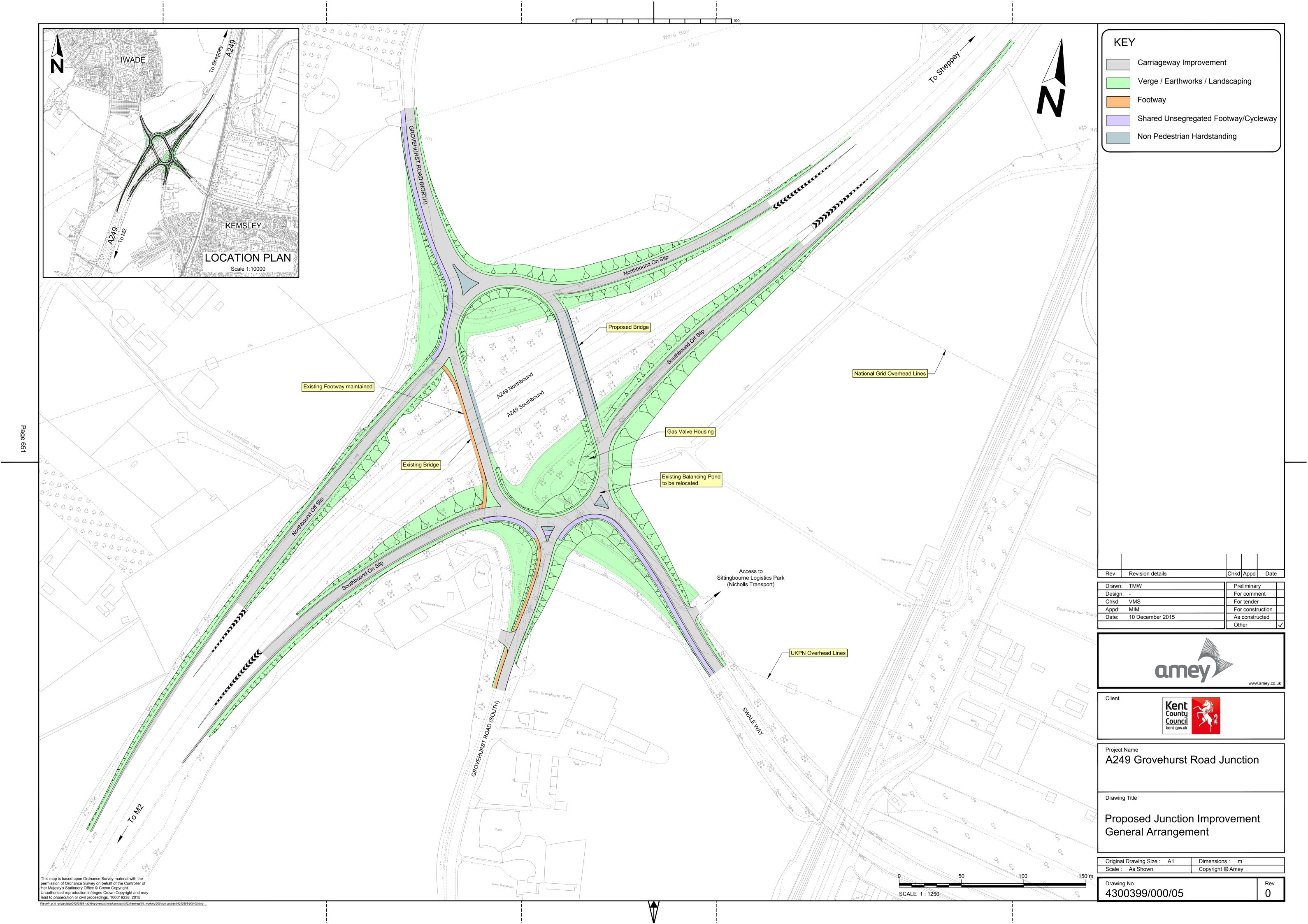
• Total working days for completion: 109



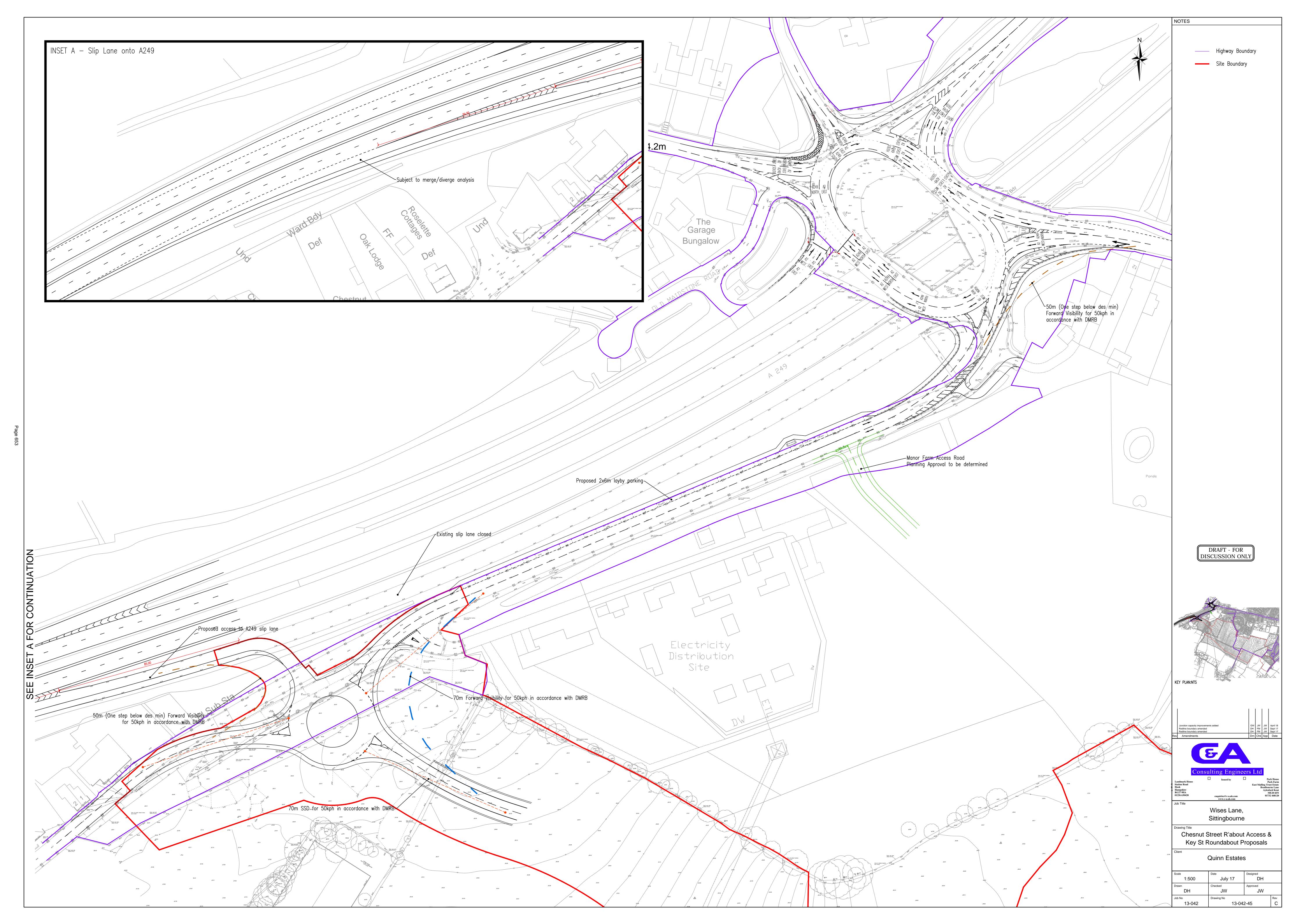




CONFIDENCE MOVES THE WORLD



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From: Mike Whiting, Cabinet Member for Planning, Highways,

Transport & Waste

Barbara Cooper - Corporate Director of Growth, Environment

and Transport

To: Environment & Transport Cabinet Committee – 28th November

2018

Decision No: 18/00064

Subject: A28 Thanet - Road Asset Renewal and Strengthening Works

Classification: Unrestricted

Past Pathway of Paper: None

Future Pathway of Paper: Cabinet Member Decision

Electoral Division: Birchington and Rural, Margate

Summary: This report concerns a project to improve the road surface of the A28 between Birchington and Margate. Funding of £2.5m in 2019/20 has been allocated in the Medium-Term Financial Plan for these works. The project involves the major renewal and strengthening of this road.

Recommendation(s): The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Planning, Highways, Transport & Waste, on:

- (i) the proposed works to renew and strengthen the A28 road surface between Birchington and Margate; and
- (ii) the delegation to the Corporate Director of Growth, Environment & Transport, under the Officer Scheme of Delegations, to take further or other decisions as may be appropriate to deliver the scheme in accordance with these recommendations as attached at Appendix A.

1. Introduction

1.1 This report outlines proposals to proceed with urgent road maintenance work to renew and strengthen the road surface of the A28 in Thanet between Birchington and Margate.

2. Financial Implications

2.1 Funding of £2.5m was allocated for the A28 works during last year's capital funding cycle and is therefore included in 2019/20 of the Medium-Term Financial Plan.

3. Policy Framework

3.1 Proceeding with these works is consistent with Kent County Council's new asset management approach. This approach is set out in *Developing our Approach to Asset Management in Highways - 2018/19 – 2020/21* which was considered by this Committee on 31 January 2018 and subsequently adopted and published in February, in order to evidence a Band 3 Incentive Fund rating and maximise Department for Transport capital funding for 2018/19. Implementing that approach contributes to our day-to-day management of highway maintenance and therefore plays a vital part in delivering Kent County Council's Strategic Statement *Increasing Opportunities, Improving Outcomes*.

4. Background

- 4.1 During last year's capital bidding round, funding of £7.5m was allocated for the highest priority unfunded highway sites (high risk issues requiring intervention in the very short term). This programme comprised £3.495m for four sites in 2018/19; £2.925m for thirteen sites in 2019/20 and £1.1m for ten sites in 2020/21. The £2.925m allocated for 2019/20 includes £2.5m for the major renewal and strengthening of the A28 in Thanet, principally the section between Birchington and Margate.
- 4.2 The A28 is an 'Other Strategic' road in our highway maintenance hierarchy. It also forms part of our Resilient Highway Network which is the portion of our 5,400-mile road network that is vital to maintaining economic activity and access to key services during extreme weather emergencies and other major incidents. It is also likely to form part of the new Major Road Network that the Department for Transport has consulted on earlier this year. The MRN will be a new category of road between Highway England's Strategic Road Network and Local Authorities' local roads and this is being set up to put these important roads on a similar investment/improvement planning footing as motorways and trunk roads from 2021/22. Local Authorities will continue to be responsible for maintaining these roads and any funding streams are unlikely to be used for maintenance save major structural renewal.

5. A28 Condition

- 5.1 As part of our regular mechanical condition surveys and safety inspections, we have identified that the existing road surface on the A28 between Birchington and Margate is nearing the end of its serviceable life. There are also signs of structural weakness in places. If left untreated, the road surface will quickly deteriorate and need regular and numerous pothole repairs.
- 5.2 The road surface needs to be renewed throughout and, in some places, deeper strengthening repairs will be needed. We plan to deliver these works from April 2019 to avoid the summer holiday season. The works will be delivered in five phases and take around two months to complete.
- 5.3 These works will be delivered under our recently awarded Road Asset Renewal Contract with Eurovia. There are no planning or compulsory purchase aspects

to this work. There are also no legal or equality implications resulting from these planned works.

6. Conclusions

6.1 A large section of the A28 between Birchington and Margate, an economically and strategically important road in East Kent, is at the end of its lifecycle and in danger of rapid failure. This would lead to temporary measures such as speed limit reductions, lane closure and full road closures being implemented to reduce the risk to road users. It is therefore proposed that this section be renewed and strengthened early in 2019/20.

7. Recommendation(s)

Recommendation(s): The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Planning, Highways, Transport & Waste, on:

- (i) the proposed works to renew and strengthen the A28 road surface between Birchington and Margate; and
- (ii) the delegation to the Corporate Director of Growth, Environment & Transport, under the Officer Scheme of Delegations, to take further or other decisions as may be appropriate to deliver the scheme in accordance with these recommendations as attached at Appendix A.

8. Appendices and Background Documents

- Appendix A Proposed Record of Decision
- Appendix B Indicative Plan of Works
- Appendix C
 - Our Approach to Asset Management in Highways document
 - Implementing Our Approach to Asset Management in Highways document
 - Developing our Approach to Asset Management in Highways 2018/19 - 2020/21

All three documents available via: http://www.kent.gov.uk/about-the-council/strategies-and-policies/transport-and-highways-policies/highways-asset-management

Appendix D - EqlA

9. Contact details

Lead officer:	Lead Director:
Alan Casson, Strategic Asset Manager –	Simon Jones, Director – Highways,
Highways, Transportation and Waste	Transportation and Waste
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alan.casson@kent.gov.uk	simon.jones@kent.gov.uk



KENT COUNTY COUNCIL - PROPOSED RECORD OF DECISION

DECISION TAKEN BY

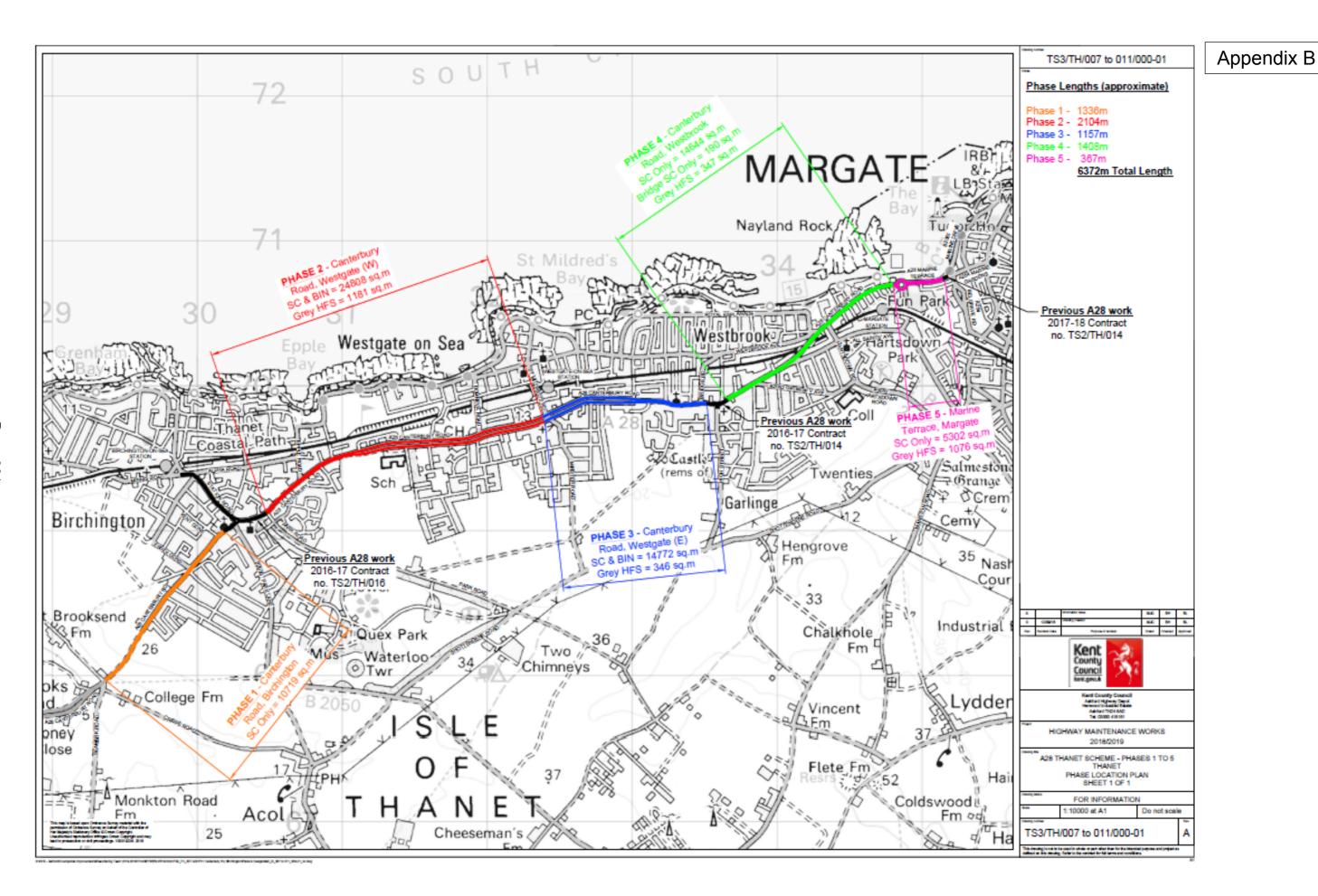
Mike Whiting Cabinet Member for Planning, Highways, Transport and Waste

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18/00064

For publication
Key decision* Yes –
Subject: A28 Thanet - Road Asset Renewal and Strengthening Works
Decision: To agree the proposed works to renew and strengthen the A28 road surface between Birchington and Margate; and the delegation to the Corporate Director of Growth, Environment & Transport, under the Officer Scheme of Delegations, to take further or other decisions as may be appropriate to deliver the scheme in accordance with these recommendations
Reason(s) for decision: During last year's Capital bidding round, Highways, Transportation and Waste submitted a bid for £31m related to a range of sites and issues that highway teams had identified had failed or will fail and which represented a significant safety or other risk to the business. Funding of £7.52m for the highest priority 27 sites (high risk issues requiring intervention in the very short term) was approved and included in the capital budget, £3.495m for four sites in 2018/19, £2.925m for thirteen sites in 2019/20 and £1.1m for ten sites in 2020/21.
The £2.925m allocated for 2019/20 includes £2.5m for the major renewal and strengthening of the A28 in Thanet, principally the section between Birchington and Margate, and that is the subject of this key decision.
The A28 is an 'Other Strategic' road in our highway maintenance hierarchy. It also forms part of our Resilient Highway Network, the portion of our 5,400-mile road network that is considered to be absolutely vital to maintaining economic activity and access to key services during extreme weather emergencies and other major incidents. This road is also a key link between the channel ports and Manston in respect of interim lorry parking arrangements.
Cabinet Committee recommendations and other consultation:
Any alternatives considered: N/A
Any interest declared when the decision was taken and any dispensation granted by the Proper Officer:
signed date
Name:





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KENT COUNTY COUNCIL EQUALITY ANALYSIS/IMPACT ASSESSMENT (EqIA)

Directorate:

Growth, Environment & Transport

Name of policy, procedure, project or service:

A28 Thanet - Road Asset Renewal and Strengthening Works

What is being assessed?

The impact of this proposed capital maintenance project

Responsible Owner/Senior Officer:

Andrew Loosemore, Head of Service, Highways Asset Management – Highways, Transportation & Waste

Date of Initial Screening:

2nd November 2018

Date of Full EqIA:

NA

Version	Author	Date Commen	
1.0	Alan Casson	2/11/18	Draft

Growth Environment & Transport

A28 Thanet - Road Asset Renewal and Strengthening Works

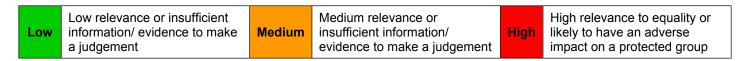
Responsible Owner: Andrew Loosemore

Version: 1.0 Date: November 2018

Part 1: Initial Screening

Proportionality

Based on the answers in the screening grid at Appendix A what weighting would you ascribe to this function – see Risk Matrix.



Based on the individual assessments the overall assessment is Low.

Growth Environment & Transport

A28 Thanet - Road Asset Renewal and Strengthening Works

Responsible Owner: Andrew Loosemore

Version: 1.0 Date: November 2018

Aims and Objective

This project concerns the major renewal and strengthening of the road surface of the A28 between Birchington and Margate.

Information and Data

None, save asset condition data, which is not specific to protected groups.

Involvement and Engagement

This project does not require wider consultation as it is a maintenance scheme to replace aged road surface assets.

Potential impact

This road carries large numbers of vehicles every day and is used by all sectors of society including those falling under protected characteristics.

Adverse Impact

There is not anticipated to be any adverse impact on service users

Positive Impact

A renewed and strengthened road surface will provide a better surface for road users to drive on and reduce the number of potholes and other defects that would need to be reacted to going forward.

Part 2: Judgement

Option 1 – Sufficient Screening	Yes X	No	
Justification: The project does not affect any particular protected group			
Option 2 – Internal Action Required	Yes	No	Х
Details of the internal action plan and mechanisms for monitoring and re	view can be found at App	endix	A
Option 3 – Full Impact Assessment Required	Yes	No	X
A Full Impact Assessment is not required for the following reasons:			

o The project does not have a significant impact on any groups or individuals with particular characteristics

Action Plan

Monitoring & Review

NA

Equality & Diversity Team Comments

N/A

Growth Environment & Transport

A28 Thanet - Road Asset Renewal and Strengthening Works

Responsible Owner: Andrew Loosemore

Version: 1.0 Date: November 2018

Part 3: Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact (s) that have been identified

Signed: Andrew Loosemore

Job Title: Head of Service, Highways Asset Management

Date: 2/11/18

Growth Environment & Transport

A28 Thanet - Road Asset Renewal and Strengthening Works

Responsible Owner: Andrew Loosemore
Version: 1.0 Date: November 2018

Appendix A – Screening Grid

Proportionality

Low

Low relevance or insufficient information/ evidence to make a judgement

Medium

Medium relevance or insufficient information/ evidence to make a judgement

High

High relevance to equality or likely to have an adverse impact on a protected group

Screening Grid

Characteristic	Could this policy, procedure, project or service or any proposed changes to if affect this group less favourably than others in Kent?			Provide details Is internal information required? If yes what? Is further assessment required? If yes, why? Internal action plan must be included	Could this policy, procedure, project or service or any proposed changes promote equal opportunities of this group? Yes/ No – explain how good practice and promote equal opportunities If yes, detail must be provided
ָּטֶ		Positive	Negative		
Page 667	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Disability	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Gender	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Gender Identity	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Race	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Religion or Belief	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Sexual Orientation	No – this project does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Pregnancy & Maternity	No – this policy does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Marriage & Civil Partnership	No – this policy does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No
Carers Responsibilities	No – this policy does not affect this group less favourably	Low	Low	No internal action or further assessment required. If any issues currently unknown are revealed then this will be revisited.	No

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From: Mike Hill, Cabinet Member for Community and Regulatory

Services

Barbara Cooper, Corpoate Director of Growth Environment and

Transport

To: Environment and Transport Cabinet Committee – 28th

November 2018

Key Decision No: 18/00007

Subject: Revision of the Rights of Way Improvement Plan

Classification: Unrestricted

Past Pathway of Paper: Environment and Transport Cabinet Committee 15 May

2018

Summary: There is a statutory requirement to produce a Rights of Way Improvement Plan (ROWIP) and review the plan within 10 years of its publication. At the Environment and Transport Cabinet Committee of the 15 May 2018 a report detailing the review of the 2007 Plan and a draft ROWIP 2018 were considered. The Committee noted progress on the plan and resolved that the draft ROWIP progress to public consultation. This report updates Members on the results of the public consultation and recommends endorsement and adoption of the final version of the plan.

Recommendation(s):

The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Community and Regulatory Services on the proposed decision to adopt and publish the Rights of Way Improvement Plan 2018 as attached at Appendix A.

1. Introduction

1.1 It is a statutory requirement to produce a Rights of Way Improvement Plan (ROWIP) and to review it within 10 years of its publication. The ROWIP sets the direction for and supports the work of the Service in meeting the County Council's statutory obligations, securing improvements to the Public Rights of Way network as well as contributing to the delivery of its strategic outcomes.

2. The Report

2.1 In line with its statutory obligations the Public Rights of Way and Access Service, (the Service) has completed a review of the 2007 Countryside Access Improvement Plans (the Rights of Way Improvement Plan for Kent) and produced a draft ROWIP. The draft plan has been amended in light of a full public consultation and is included as Appendix B.

- 2.2 Preparation of the Plan has involved extensive research, customer surveys and direct customer feedback. This has included; previously completed consultations, research of business and asset management plans, review of KCC and national research and policy, obtaining information from focus groups, Parish Councils, District/Borough Councils and County Members, and an assessment of current use and demand. This research is detailed in a suite of documents supporting and providing the evidence base for the ROWIP.
- 2.3 The main elements of the Plan including those elements that are statutory include:
 - a) An assessment of existing and potential use and demand.
 - b) Detailed customer profiling using Market Research, Mosaic and Countryside Access Management System.
 - c) National and local policy context. Attention has been given to aligning the Plan with 'Increasing Opportunities, Improving Outcomes: Kent County Council's Strategic Statement (2015-2020)', Local Transport Plan 4 and the Active Travel Strategy.
 - d) Operational management, asset management and budgetary information.
 - e) How to make the best of new national and local funding opportunities.
 - f) A delivery plan that includes main objectives, actions, benefits and key partners and resource implications.
- 2.4 Following endorsement by the Cabinet Committee on the 15 May 2018 the draft Plan progressed to full public consultation. The draft consultation Plan was widely advertised on-line, in the press and at KCC libraries and country parks. In addition, there was direct consultation with borough, district, parish councils, neighbouring authorites, Kent Countryside Access Forum, Natural England, partners, user groups and interested parties. The Consultation ran for 12 weeks between 20 June and 12 September 2018.
- 2.5 In total, 362 responses were received. A summary of the consulation results is provided at Appendix C. The responses can be summarised as follows:
 - 1) The overwhelming majority of respondents are current users of the PROW network, with the majority of those respondents using the network at least once a week
 - 2) There was strong support for the key themes identified in the Plan with only 2% of respondents disagreeing. This same high level of support was expressed for each individual theme.
 - 3) 88% of those responding found the Plan easy to understand. Of those that didn't, rights of way terminology (jargon) was highlighted as an issue. A

glossary has been added to the Plan to address this. Additionally in response to specific feedback, charts and maps have been amended.

- 4) General comment on the structure and layout of the draft Plan has been addressed where possible.
- 2.6 Detailed responses were received from many respondents. These detailed responses tended to coalesce around similar topics. In summary:
 - a) **Public Rights of Way network issues**: Perhaps not surprisingly many respondents took the opportunity to raise matters relating to current issues on the network, for instance overgrown or obstructed paths or infrastructure requiring repair. In these cases, the responses are being captured in our reporting and management systems and will be actioned in line with our stated policies and available resources.
 - b) Requests for specific schemes: Many of the responses related to very specific requests for improvements or commitment to very specific programmes of work. For instance a new route between locations A and B, the upgrade of a footpath to a bridleway or a the provision of traffic free cycle links between main urban centres. Where a desire for such improvement or new provision has been identified it will be captured in our Geographical Information System as a map layer. A simple and high level feasibility/cost benefit analysis will be undertaken to determine whether the option can be explored further so that effort is focussed on those projects that offer the greatest benefit and are most deliverable. The information will also be used to inform responses to all forms of planning consultation, plan preparation and bidding opportunities.
 - c) **Prioriites:** Feedback indicated that some respondents considered the themes to have been expressed in order of priority. This is not the case and a statement has been added to clarify this.
 - d) **Policy and delivery plan amendments:** Those making detailed responses often sought amendments to policies and/or the delivery plan to strengthen them to address specific issues or provide support for specific actions. These responses have been carefully considered and where appropriate the Plan has been amended to reflect them. In many cases it is felt that the Plan does not need amendment but that these points can be better addressed through incorporating these comments into existing service policies. In summary by theme, we received the following feedback:

e) Active Lifestyles

If active travel is to be encouraged along with increasing opportunities for riding and cycling greater focus needs to be placed on safety and the need to increase the provision of traffic free routes, safer crossings and traffic management on rural lanes providing key links to PROW. A number of respondents sought or expressed support for measures that seek to preserve the character of guieter rural roads.

f) Knowing what's out there

It was felt by a number of respondents that the Definitive Map and Statement (DMS) should be made available on-line. There are technical barriers to this but the Service will continue to improve public access to the DMS and supporting archive information.

g) Rights with responsibilitites

There was an interest by a number of respondents in seeing greater policy support for the management or prohibition of motor vehicles on PROW. 4 x 4 use of byways was the subject of specific feedback. This is a matter of continuing national focus and is likely to be subject to review by the Department of Environment, Farming and Rural Affairs in the near future. To this end, all of the service's existing policies will be reviewed to ensure that they are in line with legislation, guidance and the objectives of the ROWIP.

h) Better maintained PROW

This particular theme drew considerable feedback. There is no doubt that users particularly feel that if the plan is to provide positive outcomes then the PROW network must be well maintained and accessible. The need to improve the frequency and extent of vegetation clearance was a regular theme. The importance of differentiating between the nature of the use of routes in a utilitarian or recreational context was stressed as was the need to prioritise National Trails. The importance of maintaining the network in a way that secures wider environmental/ecological benefit was also highlighted.

i) Efficient working

The importance of, and limitations of, using volunteers was pointed out in consultation feedback. The Service will continue to look to secure the benefits that arise from the contributions of volunteers and the plan supports this initiative.

j) Evolution of the network

Some feedback suggested that the Plan did not fully address the likely scale and pace of change in Kent in the next decade, particularly that related to housing development in response to population increase. The list of major development sites has been removed as a number of these developments fall outside of sites allocated within the Local Plan and the Service does not wish for any support for development of the sites to be inferred based on their inclusion in the plan. In any event the number and scale of planning applications now being received by the Service would indicate that it is simply not possible to focus activity on larger sites.

2.7 A full Equalities Impact Assessment has been produced in tandem with the plan and will be used to further guide policy development and service delivery. This is included as Appendix D.

3. Financial Implications

- 3.1 While it is a statutory obligation to produce a ROWIP there is no obligation to deliver the improvements identified in the plan. This was to encourage authorities to produce plans that were ambitious rather than simply seeking to match the scale of ambition with the resource available. In adopting the plan the County Council would not commit to funding the projects or programmes identified.
- 3.2 The delivery of programmes and projects set out in the plan will be dependent on identifying resource from within existing budgets or securing the necessary resource either through the County Council's normal budgetary processes or external funding sources.
- 3.3 Many successful projects delivering improvements to the network were delivered through the life span of the first ROWIP as a result of amending policies, our approach, partnership working, securing external funding and developer contribution. Improvements can, and have been delivered against a back drop of reducing budgets.

4. Policy Framework

- 4.1 The proposed decision is aligned to the County Council's strategic objectives as articulated in "Increasing Opportunities, Improving Outcomes: Kent County Council's strategic objectives.
- 4.2 The Plan and its supporting evidence base set out in detail the links to not only Kent County Council's strategic objectives but numerous other County Council, Government and partner strategies.
- 4.3 Given the certainty that linked strategies and policies will continue evolve during the life of the ROWIP emphasis has been given to setting out the positive outcomes delivered by having a correctly recorded, well maintained and accessible PROW network.

5. Conclusions

The Public Rights of Way and Access Serrvice has reviewed the Rights of Way Improvement Plan 2007. A draft Rights of Way Improvement Plan was prepared and, with Member approval, was subject to a full public consultation, June – September 2018. The consultation highlighted strong support for the plan. The draft Plan has been further amended in light of the response to the consultation. If adopted the Plan will shape the work of the Service over the coming decade.

6. Recommendation

Recommendation(s): The Cabinet Committee is asked to consider and endorse, or make recommendations to the Cabinet Member for Community and Regulatory Services on the proposed decision to adopt and publish the Rights of Way Improvement Plan 2018 as attached at appendix A.

7. Background Documents

7.1 **Appendix A**: Proposed record of decision.

Appendix B: Amended – draft Rights of Way Improvement Plan

Appendix C: Summary of consultation results/responses.

Appendix D: Equalities Impact Assessment

8. Contact details

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KENT COUNTY COUNCIL - PROPOSED RECORD OF DECISION

DECISION TAKEN BY

Mike Hill

Cabinet Member for Community and Regulatory Services

Name:

DECISION NO:

18/00007

For publication
Key decision* Yes –
Subject: Revision of the Rights of Way Improvement Plan
Decision: To adopt and publish the Rights of Way Improvement Plan 2018
Reason(s) for decision:
There is a statutory requirement to produce a Rights of Way Improvement Plan (ROWIP) and review the plan within 10 years of its publication. The ROWIP sets the direction for and supports the work of the Service in meeting the County Council's statutory obligations, securing improvements to the Public Rights of Way network as well as contributing to the delivery of its strategic outcomes
Cabinet Committee recommendations and other consultation:
At the Environment and Transport Cabinet Committee of the 15 May 2018 a report detailing the review of the 2007 Plan and a draft ROWIP 2018 were considered. The Committee noted progress on the plan and resolved that the draft ROWIP progress to public consultation.
The revised draft is being considered by the Environment and Cabinet Committee on 28 November 2018
Any alternatives considered:
Statutory duty
Any interest declared when the decision was taken and any dispensation granted by the Proper Officer: None
signed date
organisa dato



KENT COUNTY COUNCIL'S

RIGHTS OF WAY Improvement Plan





Foreword



Mike Hill OBE -

Mike Hill OBE -Cabinet Member for Community and Regulatory Services

Welcome to Kent County Council's Rights of Way Improvement Plan (ROWIP). The plan sets out our objectives for Kent's Public Rights of Way (PROW) network and wider public access for the next 10 years.

I have been very pleased to see how the Public Rights of Way and Access Service and partners have managed to translate the previous plan into well informed and tangible projects. I have been called upon to cut the ceremonial ribbon on a number of occasions to celebrate projects that have contributed to the health and well-being of the public, supported the rural and visitor economy of Kent and provided alternative sustainable travel options to the car. All of these projects have contributed to delivering unparalleled access to Kent's wonderful and diverse countryside and coast.

This plan is founded on detailed research, analysis and consultation with the public and stakeholders. It sets out the very positive outcomes that are delivered through having an extensive 6,900 km of Rights of Way network, access to quality greenspace, the coast and as a high amenity alternative to footways and roads in the urban environment. The scale of the response received reflects the great value that Kent residents and stakeholders attach to being able to access the county's countryside and coast and the passion that they hold for it. It also reflects that the work of the PROW and Access Service over the past 10 years has been in the right direction, providing extensive improvements to the network. This plan provides a mandate to continue to build on these achievements over the next 10 years.

This plan is both ambitious and realistic about the challenges that Kent and wider society face. Delivery of the plan will contribute significantly to making Kent a healthy, prosperous and enjoyable place in which to live.

Our Vision

"To provide a high quality, well-maintained Public Rights of Way network, that is well used and enjoyed. The use of the network will support the Kent economy, encourage active lifestyles and sustainable travel choices that support health and wellbeing, and contribute to making Kent a great place to live, work and visit ".



Introduction

Kent County Council has a duty to prepare a ROWIP under Section 60 of the Countryside and Rights of Way Act 2000 and to update the plan every 10 years. The revision of the Kent ROWIP provides an opportunity to take a more integrated view of the value of the rights of way network in fulfilling the needs of the communities of Kent.

In the period 2007 – 2017 the County Council delivered a wealth of improvements to the PROW network despite the extremely challenging financial climate. This is a plan that aims to secure the best possible outcomes with the resource that is available, accepting that the current limitations on resources are set to continue. It seeks to address the future needs of Kent's PROW users through the delivery of a range of actions over the next decade.

Kent County Council's PROW and Access Service is committed to working to deliver the positive outcomes identified in the plan and has looked for innovative ways to improve the PROW network in the face of financial challenges. We aim to create a network that not only provides a safe, sustainable means of travel but also delivers the benefits that access to the network, countryside, coast and green spaces can make to improve the quality of life for Kent's residents and visitors.

The PROW network is free to all users regardless of age, race or gender and provides physical and mental health and wellbeing benefits to all. The plan will aim to encourage use of the network through the promotion of these important benefits.

The plan assesses the extent to which the PROW network meets the present and likely future need to the public in:

- contributing towards more sustainable development;
- delivering active travel options;
- providing opportunities for exercise, leisure and open-air recreation.

The plan will also look to address the accessibility issues and other barriers that the visually impaired, those with mobility problems and under-represented groups face when using the PROW network.





Rights of Way Improvement Plan Process

The PROW and Access Service team have followed the statutory process to create the plan, following relevant guidance and advice. The plan was completed in five stages:

- 1) Review of the ROWIP 2007 2017 (pages 8 9).
- Review of current policy, strategies, academic studies and completion of market research (pages 10 – 17).
- 3) Analysis of current provision, spatial data and future demand (pages 18 29).
- Identification of key themes (pages 6 – 7).
- 5) Delivery Plan and Statement of Actions (30 41).

The plan is therefore structured around the outcomes of each of these five stages. The research and analysis completed has given us further insight into the current needs and priorities of Kent's PROW network users. Six broad themes emerged, which are set out in the next section. The themes are not in order of priority or importance, each has a main objective and a number of actions and benefits which are detailed in the Delivery Plan – Statement of Actions.

The research and analysis has provided a strong validation for the work of the Service in delivering projects under the 2007-17 ROWIP. It tells us that the needs and priorities of Kent's PROW network users have not significantly changed since 2007.

Key Themes







Active lifestyles

The health and wellbeing benefits of physical activity are well recognised, especially when the activity takes place in areas of countryside and green space. This theme aims to encourage active lifestyles through making changes to the network to accommodate active travel and encourage leisure and recreational use.

We will aim to contribute towards tackling health issues and inequalities through improving access to the natural environment and green spaces.

We will promote use particularly in deprived areas where existing access is low and where there are poor health outcomes.

Evolution of the network

The need for the PROW network to evolve and to meet the future demand from Kent's growing population was identified and is well understood. Well planned new provision, including green infrastructure is required to facilitate sustainable travel patterns, with the PROW network providing an important element of this infrastructure.

The PROW network is required to evolve not to only withstand the pressures from increased use but also to provide a high quality facility to encourage a modal shift to walking and cycling; in this way the PROW network is a key contributor to getting people out of their cars to take on more active travel for everyday journeys and for recreation and leisure.

Knowing what's out there

Results from the market research showed that the most common barrier preventing use of the network is lack of information.

People want to know where routes are and where they will take them.

We will continue to break down these barriers and encourage new users to the network as well as increasing current use, through targeting information, improving signage and improving provision around key leisure and recreational facilities.







Well-maintained network

Maintenance was the most common theme to emerge from our market research when we asked our customers what issues they had encountered on the PROW network. Overgrown vegetation and poor maintenance were the top answers received from stakeholders, Kent residents and online groups. Poor maintenance acted as a significant barrier, stopping people from using the network, especially for a higher percentage of the older age groups (55+). With Kent's ageing population this is a barrier we as a Service will aim to reduce.

The well-maintained network theme will improve and increase the current maintenance of the network through further targeted vegetation clearance, signage and surfacing to encourage and increase use. Maintenance on locally important strategic routes will be prioritised.

Rights with responsibilities

The PROW and Access Service has a statutory duty to ensure the network is recorded, protected and maintained. It is important that we work with the landowning community in ensuring statutory compliance and in delivering improvements to the network. We advise on and where appropriate, progress applications to amend the PROW network in the interest of the public and/or the landowner.

The PROW and Access Service will continue to promote responsible use by the public when exercising their rights.

Efficient delivery

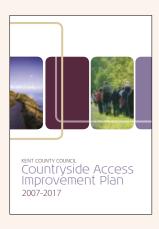
The review of previous ROWIP's and the analysis of market research has provided us with an insight of our customers' needs and priorities.

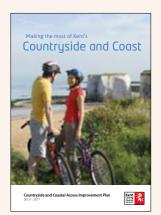
Access to new information and advances in available technology will help us build on the significant and innovative developments already made by the PROW and Access Service.

Reflections on the delivery of ROWIP's 2007 -17

During the first phase of the production of this plan, we reviewed what had been achieved through the delivery of the award winning ROWIP 2007-2017 and the Countryside and Coastal Access Improvement Plan 2013 – 2017.

A full report 'Review of the ROWIP 2007 – 2017' providing further details of the PROW and Access Service's achievements over the last decade forms part of the evidence base and is available online and on request.







Adoption of asset management principles enabled better planned programmes of maintenance and resulted in lower levels of reporting for some elements of the asset.



Requirements attached to the regime of agricultural subsidies delivered higher levels of compliance by the agricultural community and reduced levels of reported obstructions to the PROW network by agricultural activity. Changes to the regime have the potential to deliver further benefits in the next plan period.



The adoption of a policy of least restrictive access and the removal of existing stiles, where this could be negotiated, has delivered a network that is now 70% stile free. This activity could be better targeted to deliver further improvements in accessibility.



The creation of coherent networks of higher status routes for horse riders and cyclists remains a significant challenge, particularly away from economic growth areas. Greater consideration needs to be given to using existing roads and verges to reduce the fragmentation of the network of bridleways, cycle tracks and byways.



There has been some truly innovative work completed to inform the public about the network and encourage use. In terms of securing health benefits, activity must be targeted at, and communicated in a way that encourages use by those communities where poor health outcomes are prevalent. We cannot place too great a reliance on on-line communication.



Housing and business development in the county placed significant pressure on the PROW and Access Service, but it also provided significant opportunities to secure improvements to the network, particularly connectivity, asset renewal and provision for higher rights users.



Nuisance use of PROW network is an issue raised by many stakeholders and users and generally reflects wider issues within society. There is a role for the Kent Countryside Access Forum in promoting understanding between different stakeholders and responsible use of PROW network by the public.



The Service will need to continue to embrace new technology and improve existing systems if it is to maintain or improve levels of customer service.

Policy Context

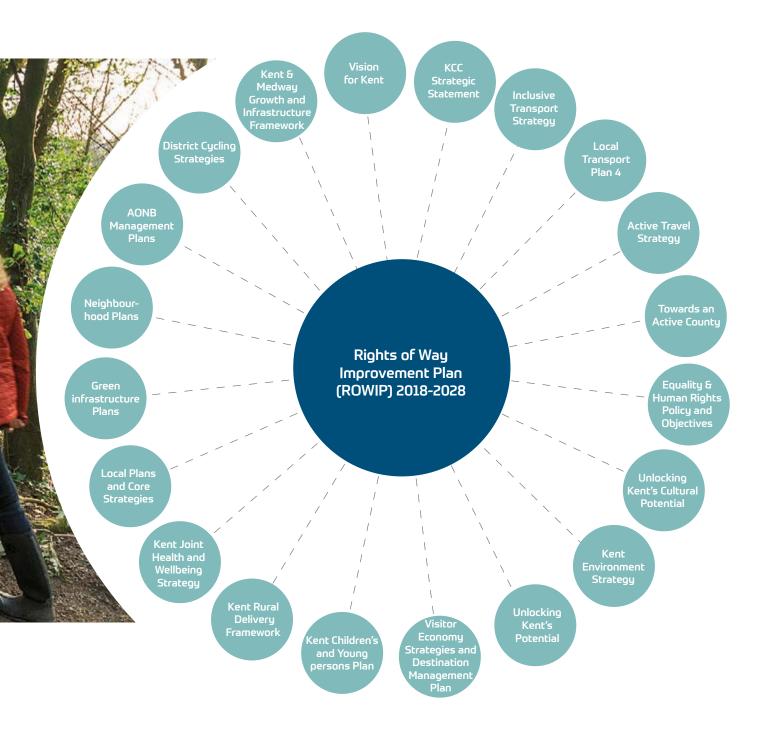
The importance of the PROW network, the countryside, riverside, coast and publicly accessible green space is recognised in many national and local strategies and is afforded strong protection in law. An estimated 4000 individual statutes, regulations and judgements have a direct relevance to its protection, use and development.



The 'Strategy and Policy Review' provides a detailed overview of associated strategy and policy forms part of the evidence base available online and on request.

Delivering Kent's Priorities

Due to the wide-reaching work of the PROW and Access Service, the ROWIP directly contributes to the delivery of many Kent policies and strategies, some of these are Kent County Council's and others are those of partner organisations. The diagram below shows the policies and strategies that share common objectives to the ROWIP.



Benefits of Using the Public Rights of Way Network



There is a large and growing body of evidence about the benefits of physical activity and access to green space and coast, of which the PROW network and access land are key components. The network provides important social, recreational and sustainable travel options which support Kent's economy. This section provides a summary of the evidence gathered from the Policy and Literature Review.

The 'Policy and Literature Review' provides detailed information on the benefits of the PROW network, forms part of the evidence base and is available online and on request.

Health and Wellbeing

- Being physically active can help towards the prevention of at least 20 different chronic health conditions, including coronary heart disease, stroke, cancer, type 2 diabetes and mental health problems¹.
- Physical inactivity costs Kent £306 million and 300 premature deaths each year².
- NHS Digital statistics show 18,442 patients had a condition where obesity was a factor during 2016/17, compared to 14,032 the previous year - a 31% increase; around half of Kent's 1.5 million population are now said to be overweight or obese, creating huge pressure on the NHS³.
- Increasing evidence suggests that one of the most efficient ways to manage mental health issues is through physical activity, especially in the natural environment which is associated with greater feelings of revitalisation, increased energy and decreases in tension, confusion, anger, and depression⁴.
- The benefits of exercise in the natural environment happen almost immediately: only 5 minutes of exposure improves self-esteem and mood, irrespective of gender, age and health status⁵.
- Health and wellbeing outcomes have historically been poorly integrated with spatial planning, creating places that do not support people to improve their health through regular activity such as walking or cycling, or which contribute to poor health through high levels of road pollution, for example⁶.
- Health & wellbeing is also improved through regular horse riding⁷. It is particularly relevant to the under 16s and women over the age of 45 who would otherwise be sedentary. There is no significant difference in activity up until the age of 75.

The ROWIP has a significant role to play in helping to deliver health and wellbeing benefits and will aim to contribute to redressing some of the spatial planning deficiencies and health inequalities throughout Kent.

- 1 (Department of Health/Chief Medical Officers, 2011)
- 2 (UK Active, 2014)
- 3 (Kent Messenger Published 5th (April 2018))
- (Thompson Coon, et al., 2011)
- 5 (Barton & Pretty, What is the best dose of nature and green exercise for improving mental health? A multi-study analysis, 2010)
- (Barton H. , 2009), (Building Health Foundation, 2009)
- 7 (Barton H., 2009), (Building Health Foundation, 2009)



Sustainable Travel Encouraging Active Lifestyles

- Walking and cycling as a means of transport to reach a destination, termed 'active travel', allows people to be physically active as part of their daily lives.
- Active travel brings a range of health and wellbeing benefits (as detailed on page 12), reducing traffic congestion, air pollution and outputs of climate change gases.
- Physical activity is essential for healthy growth and development, it increases cognitive outcomes and school attainment, and improves social interaction and confidence⁸.
- In March 2018 the National Institute for Health and Care Excellence (NICE) published new guidance relating to the importance of physical activity in the local environment and how the PROW and cycle network and public open space can help facilitate active lifestyles.
- A lack of routes, poor availability of information about routes, concerns over safety and the speed and convenience of motorised transport can all act as barriers to people choosing active travel.⁹

The ROWIP will aim to encourage active lifestyles through:

- better promotion of the existing network;
- · addressing barriers that prevent use;
- working in partnership with planning authorities and developers to create well-designed, accessible environments that encourage active travel and walking, cycling and horse riding as leisure and recreational pursuits.

Supporting Rural Economy and Economic Growth

- Kent's transport network is a vital element in facilitating economic growth and supporting the demands of a rising population.
- A well planned green infrastructure which promotes and encourages sustainable and active travel is required and the PROW network is a significant element of this.
- Working with local authorities and developers in the context of Local Plans and the Kent and Medway Growth and Infrastructure Framework (GIF) to identify growth areas and the infrastructure needed to accommodate this growth until 2031, we can work towards more sustainable travel patterns in Kent.
- Tourism is an important industry for Kent, with the total tourism value estimated at £3.6 billion in 2015, supporting just under 52,000 full time equivalent jobs¹⁰.
- Kent's landscape is a key tourist attractor: it offers one of the longest coastlines in the UK, two Areas of Outstanding Natural Beauty (AONBs) and the North Downs Way and England Coast Path national trails.
- The Natural England Monitoring Engagement with the Natural Environment (MENE) data indicates an average spend when visiting the countryside of £6.44 per visit; with an estimated total spend of £20bn in England between March 2014 and February 2015¹¹.

The ROWIP can help contribute towards a robust infrastructure that enables development and encourage economic growth leading to regeneration and attraction of new businesses. The ROWIP has a significant role in supporting sustainable economic growth, directly contributing to transport, green infrastructure and open spaces; three areas identified in Kent and Medway Growth and Infrastructure Framework as critical to support growth in the period to 2031.

The ROWIP as a statutory document can inform, support and add weight to policies within Local Plans and Neighbourhood Plans.

Sustainable rural leisure and tourism is a key way to support the socio-economic well-being of rural areas, providing jobs and supporting community services. The PROW network and the ROWIP has a critical role in this.

^{8 (}All-Party Parliamentary Commission on Physical Activity, 2014)

^{9 (}Lee & Moudon, 2004), (Kent County Council, 2017, Active Travel Strategy (draft))

¹⁰ Visit Kent (2016), Economic Impact of Tourism – Kent – 2015 Results.

¹¹ Natural England – Monitor of Engagement with the Natural Environment age 2089rt, May 2017.

Market Research & Stakeholder Engagement



Market research was used to gather information from our customers and stakeholders to understand their priorities and needs and how the network currently meets demand. The research also helped to determine how the network must evolve to meet future requirements for residents and visitors, providing services accessible to all people within the community. Through analysis of the information gathered, common themes emerged. These themes were used to guide the ROWIP's delivery plan and statement of actions.

The 'Market Research and Stakeholder Report Summary' forms part of the evidence base and is available online and on request.

Key Findings

PROW Use

- The top two most popular reasons for using the PROW and cycle network were: 'to go for a walk / run / cycle / be active / healthy' and 'visiting nature / wildlife'.
- Using PROW to take children to school or getting to work scored relatively low in our research with less than 10% using the network for this purpose. There is clearly potential to encourage increased use of the PROW network for this purpose, particularly given extensive and often high amenity PROW networks within urban areas.
- Our research showed that the vast majority of PROW users experienced positive feelings relating to vitality and happiness when using the network, showing how valuable the network is in improving our quality of life through health and wellbeing.

Barriers to PROW Use

- The top three issues that were stopping PROW use were: overgrown vegetation, cleanliness / unpleasant environment and poor maintenance of paths.
- Lack of information acted as a greater barrier for the younger age groups than older demographic.
- There was a lower frequency of PROW use for those who indicated that they had a disability when compared to those who did not, with only 11% with a disability using the footpaths at least once a week compared to 38% of able bodied users.
- The older age groups (55+) found poor maintenance of stiles/gates and surface, overgrown vegetation and difficult terrain the biggest barriers.
- Fragmentation of the PROW network, especially for higher status routes, and the volume of motorised traffic on connecting highways raises safety concerns and makes the network inaccessible.
- In line with previous Sustrans research, we found that use of cycle path / tracks was higher amongst males (33%) when compared to females (22%). Sustrans have identified the need to provide cycle paths / tracks separated from traffic to get more women

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Encouraging PROW Use

- PROW non-users were less confident in their knowledge of PROW. In other words, there was a correlation between increased use of PROW and greenspace and the provision of information. Those with good access to online PROW information demonstrated higher levels of use for activities like horse riding, visiting viewpoints /attractions and geocaching. Findings showed that increased knowledge improved confidence and encouraged use.
- The top three answers to 'what will encourage use of the PROW network', related to information: knowing where routes will take me, knowing where routes are and improving signage and waymarking on routes.
- There was a correlation between age groups and the type of information they use; younger age groups 16

 44 demonstrated a willingness to use phone apps, those over 55 used maps and guides.
- Factors identified to encourage use were: cutting back vegetation and improving cleanliness (removal of litter, animal fouling and graffiti). For the non-user groups the top two responses were 'knowing where the routes are' and 'knowing where the routes will take me'.
- Improvements to the reporting system were highlighted through the research with 60% of the stakeholder group saying that improvements relating to customer service were needed. The top three methods chosen for reporting a problem on the network were online, by phone and using a phone app, with 51% of the non-stakeholders expressing a preference for making reports by phone.

Evolution of the PROW Network

Through stakeholder engagement the following were identified as key ways in which the PROW network needs to evolve to meet future demands:

- Increase provision of traffic free routes as a safe and sustainable alternative to car travel.
- Provide links to places of work, schools and other amenities.
- Provide good circular and promoted routes for leisure and tourism.
- Remove barriers and replace stiles with gaps or gates.
- Introduce strategies and policies to ensure connectivity of the network through the consideration of PROW within new development and within transport plans.
- Protect, enhance, expand and integrate the PROW network. With the limited resources available, focus on priority routes which are promoted or provide primary access to amenities.



redit: Photo/Wheels for All

Blind, Partially Sighted and Limited Mobility Access

Through stakeholder engagement the following were identified as key ways in which the PROW network needs to evolve to meet future demands:

- Improvements to the physical network were identified, specifically:
 - Remove barriers where feasible.
 - Provide smoother, wider, all-weather surfaced routes with tactile entrances.
 - Use large, clear print signage on routes.
- Information facilitates informed decision making about route choice.

Improving the Accessibility to Woodland including for Equestrians and Cyclists

Through stakeholder engagement the following were identified as key ways in which the PROW network needs to evolve to meet future demands:

- Resilient surfaces are required to sustain cycle and equestrian use and to avoid conflict between users.
- A strategic overview is required to identify opportunities for cyclists and equestrians, including consideration of new bridleway routes and better connections to other PROW and the wider highway network.
- The importance of well signed, well maintained routes with improved surfaces and no stiles.
- The provision of parking at accessible woodland sites is important for those that do not live close to woodlands.

The ROWIP will use the information gathered through the market research and engagement to enhance the identification of future projects most likely to deliver positive outcomes and to inform policy and design. We will continue to build on partnerships with stakeholders over the next 10 years; ensuring delivery is aligned to our customers' needs.

Under-represented Groups

Studies have shown that people from Black, Asian and Minority Ethnic (BAME) communities, disabled people and younger age groups visit the countryside less frequently. The market research also showed an under representation for these specific groups. Details of the market research demographic results are included in 'The Current Network - Use and Provision' document.

'The Current Network – Use and Provision' forms part of the evidence base and is available online and on request.

People with a Disability

The term disability covers a range of conditions and impairments, each condition or impairment has a different effect on the individual's confidence and ability to use the PROW network.

- The MENE research has shown that 18% of people with a disability never visit the natural environment, compared with 8% of the non-disabled population. Reasons for not visiting the countryside are related to their condition, with 'old age', 'poor health' and 'a physical disability' given by 92% of respondents.¹²
- Providing a network for people with different disabilities proves challenging, as different requirements often result in conflict between users e.g. where a tactile pavement required by a visually impaired user is unsuitable to a wheelchair user.
- The results from the market research showed that respondents who said they were 'confident and had a basic knowledge' were significantly lower amongst those who indicated that they have a disability.

The PROW and Access Service has a good record of working closely with disabled user groups making improvements to the network. We will continue to improve routes for different types of disabled users. Following initial contact during the analysis stage of the plan, we will keep communication open with specialist user groups to share information about newly accessible routes.

We will continue to liaise with these groups and organisations to ensure the design of schemes meets their needs. We will refine guidance for specific user groups, which we will share with planners and developers.



¹² Natural England Monitoring Engagement with the Natural Environment – 24 Paidle 9692 'poor health' 42% and 'a physical disability' 34%



Under-represented Age Groups

- Other under-represented groups that are less likely to visit the countryside, are the younger and older age ranges.
- MENE research shows that those aged between 19 and 25 and those over the age of 65 were least likely to have visited the outdoors in the previous 7 days.
 The results from the market research also showed that the 16 24 age group were underrepresented.
- Market research results highlighted that younger age groups were less likely to be interested in using the PROW network or take alternative transport. It showed that a lack of information acted as more of a barrier for the younger age groups.

Breaking down barriers preventing use through better promotion, sharing of information and increasing knowledge & confidence of the PROW network will encourage these under-represented groups to visit the countryside. We will continue to provide information at gateways to the PROW network, such as country parks, to encourage wider exploration.

Black, Asian and Minority Ethnic (BAME) Groups

- MENE research has shown that BAME populations who do visit the outdoors are more likely to visit urban locations and places closer to home.
- A higher proportion of Kent's ethnic population live in urban Dartford and Gravesend where the cost of travel, time and transport issues need to be considered when accessing the countryside. There is great value in designing housing developments where access to greenspace is available, and where access to established communities, the wider countryside and coast is retained or created.
- Overcoming barriers is key to encouraging use for these under-represented groups. The DEFRA report 'Outdoors for All?' 13 suggests various actions which include making sure promotional material is available in a range of formats and languages, avoiding stereotypes, working in partnership with a range of organisations and establishing community outreach organisations extending staff and volunteer awareness and diversifying the volunteer profile.

The PROW and Access service will continue to seek improvements in making information more accessible to increase knowledge & confidence for all under-represented groups.

Current Resource, Provision and Use



Public Rights of Way Resource

There are a range of resources that the PROW and Access Service has at its disposal including staff, allocated budget, volunteers, PROW asset and funding raised through external sources. In the case of the latter we have had success in securing funds for improvements to the network from developer contributions through requesting Section 106 Agreements, the Single Growth Fund, PASSAGE project, Tesco's Bags of Help and the Heritage Lottery Fund.

Staff and Volunteers

The PROW and Access Service has 22 full time equivalent staff members who are assisted by the Countryside Access Wardens, Kent Countryside Access Forum and various volunteers and volunteer groups who carry out a range of work from vegetation clearance, gate and step installation to completing surveys and historic research.

Volunteers are the eyes and ears in the communities of Kent and the Countryside Access Wardens are integral to the PROW and Access Service in helping keep the network free of obstructions and signposted. The Kent Scheme is innovative and popular in that it allows volunteers to work in their own time and report back to us on their activity and findings.

Partners

There are a wide range of organisations and services that are active in the management of Kent's countryside and coast and have much to contribute towards the improvement of the PROW network. Partnership working with these organisations and services is key to the delivery of this plan.

Some of our key partners include Countryside Management Partnerships, Country Parks, District, Borough and Parish Councils, English Heritage, Explore Kent, Forestry Commission, High Weald AONB, Kent Downs AONB, KCC Highways Transportation and Waste, MOD, National Trust, Natural England, user and interest groups (listed in the glossary on page 43), Visit Kent and the Woodland Trust.

Public Rights of Way Network

Like the rest of England and Wales, Kent has a network of paths which are protected in law and known as PROW. These paths form a unique resource freely available to the public to explore the countryside and coast and provide important links between and within Kent's communities.

This section provides a summary of the current PROW network and access opportunities available to Kent's residents and visitors, looking specifically at links to areas of green space, transport hubs and growth.

Kent has a 6900km network of public rights of way. The percentage of higher status paths including Byways, Restricted Byways and Bridleways is lower than the national average, with only 16.65% of the network available to equestrians and cyclists and less still, 5.5%, available to carriage drivers and 3.35% to motor vehicles. The table below shows the total length of PROW network available at the time this document was written

A detailed overview 'The Current Network (Use and Provision)' forms part of the evidence base and is available online and on request.

Current Provision	PROW Length (km)	Footpaths (km)	Bridleways (km)	Restricted Byways (km)	BOATs (km)
2017	6898	5748	764 694	149	231

Public Rights of Way Asset

The PROW network asset comprises many elements, some of which are entirely the responsibility of the County Council, such as surface maintenance, fingerposts, waymark posts, safety barriers and many of the bridges. Other elements are the responsibility of landowners.

The value of the asset based on current replacement costs for those elements for which the County Council is responsible, is calculated at £108 million, with an annual capital and revenue requirement of £2.4 million to maintain the asset in an optimum condition.

The County Council formally adopted asset management principles for the management of the PROW network on the 8 February 2008. This approach has been beneficial in establishing the resources required to meet the County Council's statutory obligations in respect of:

- i maintaining the PROW network;
- ii identifying priorities for expenditure, and;
- iii allowing procurement decisions and the standards adopted for the asset to be rigorously tested so as to achieve best value.

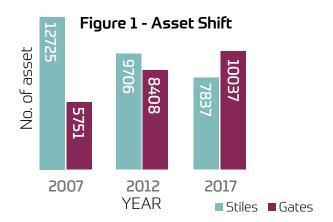
Key to the delivery of the positive outcomes set out in the ROWIP is the ability to take informed decisions about the PROW asset and where investment is best made to both comply with the County's statutory obligations and deliver the greatest return in respect of positive outcomes. It also enables informed decisions to be taken around design and investment commitments required to address pressure arising from climate change. The PROW and Access Service developed a simple cost benefit analysis tool, the 'Intelligent Investment Tool' to facilitate informed decision making.

The 'PROW and Access Service's Asset Management Plan' is updated on a regular basis and forms part of the evidence base available online and on request.

Removing Barriers

The use of stiles on the network as a means of stock control acts as a barrier to PROW users. People with a wide range of mobility issues from wheelchairs users, ambulant disability, those who are elderly or those with young families may find stiles impassable or difficult to use.

Figure 1 highlights how this element of the PROW asset has changed over the last decade, with the number of stiles reducing and access to the network improving as a result.



Access to Green Space

In addition to the PROW network, there are approximately 12,480 hectares of publicly accessible green space in Kent. Evidence around the health and wellbeing benefits provided by access to green space are well documented. Areas of accessible green space include Country Parks, Forestry Commission land, Woodland Trust land, Village Greens, Common Land and Open Access Land.

The Kent Nature Partnership's Health and Nature subgroup produced a natural green space needs assessment, which identified those areas where there is both a low prevalence of the population being physically active and a low level of natural green space provision.¹⁴ The Marmot Review¹⁵ also recognised the importance of good quality open and green space in tackling health inequality and recognised that the availability and quality of access to green space is not evenly distributed, with those in deprived urban areas often having less access to health-improving green space.



^{14 (}Bennett, Davies, Hodgson, Pett, & Witts, 2016)

¹⁵ Fair Society, Healthy Lives (The Marmot Review) (2010)



Access to the Coast

Following the introduction of the Marine and Coastal Access Act 2009, the County Council has been working in partnership with Natural England to establish the Kent stretches of the England Coast Path. This is a new National Trail walking route that will eventually circumnavigate the entire English coastline. In addition to the creation of a linear walking route, the project secures access rights for the public to explore beaches and land along the coastline – known as 'spreading room'.

When the National Trail is complete, the path will be approximately 2,700 miles long, making it one of the longest promoted coastal walking routes in the world. Due to the scale of the project, the trail is being developed in stretches around the country. The first stretches of the Coast Path in Kent, between Ramsgate and Camber, were opened to the public on the 19 July 2016. This provided a 106 km (66 mile) trail, connecting coastal communities and bringing tourism opportunities to the region. Work is currently in progress to develop the remaining stretches of coast path along the North Kent coast, which are planned to be open to the public by 2020.

Current Use and Value

The PROW and Access Service often uses 'counters' as a measure of the use of a route prior to and after improvement. There are further tools such as Outdoor Recreation Valuation (ORVal), Walkability and Propensity to Cycle tools that are also available.

Welfare Value

The ORVal tool is a map-based web application. It provides further evidence of the value and benefits that are derived from publicly accessible space and the PROW network. ORVal shows usage and welfare values that are generated by accessible green space either as an individual site or as a region. The welfare refers to sense of wellbeing or utility that each person feels as a result of their experience. The welfare value for green space is the figure for the monetary equivalent of the welfare enjoyed by a person as a result of having access to green space. The welfare value can be used when applying cost-benefit analysis to assess future planning applications and projects that impact on the PROW network and other accessible green space. It is supported by DEFRA and endorsed by the Treasury.

Physical Activity Data Tool

The physical activity data tool published by Public Health England in April 2018, presents data on physical activities including walking and cycling with the aim of helping to promote physical activity, develop understanding and support the benchmarking, commissioning and improvement of services. It also includes information on related risk factors and conditions such as obesity and diabetes.

Kent Mental Health & Wellbeing Index

The Kent Mental Health & Wellbeing Index has been created from a wide range of aspects of wellbeing. Constructed at ward level, it provides an assessment of the relative assets and vulnerabilities of an area in respect of the mental health and wellbeing of the population within it.

In addition, the Propensity to Cycle Tool, Route Selection Tool and the Walking Route Audit Tool, as referenced in the Government's technical guidance for local cycling and walking infrastructure, help gauge the likely or relative level of use and can assist in directing investment decisions.

These assessments and data tools combined with available mapping can be used to prioritise areas for future action and investment, based on levels of population deprivation, size and need. They can be used by the PROW and Access Service to support strategic decision making with regard to service provision and to identify projects which focus on preventative action and with potential to deliver greatest value in health and wellbeing benefits.

Identifying Future Demand



It is important to look at how Kent's population is going to change in order to identify future demand and plan the Service's delivery over the next 10 years. This section summarises Kent's demographics, current travel patterns and growth and development areas and how the ROWIP intends to respond to the pressures and demands each place on the PROW network. What is clear is that if population in the county grows as predicted and house building keeps pace this decade will witness an unprecedented scale and pace of growth. Growth on this scale has the potential to bring with it increased demand and pressure on the PROW network.

Further information on these areas are available in 'The Current Network (Use and Provision)', which forms part of the evidence base and is available online and on request.

Kent's Population Demographics

"All regions of England are projected to see an increase in their population size over the next decade, with London, the East of England and South East projected to grow faster than the country as a whole. The population is also ageing with all regions seeing a faster growth in those aged 65 and over than in younger age groups." Suzie Dunsmith, Population Projections Unit, Office for National Statistics.

Kent's population is predicted to increase at an accelerated rate to the rest of the country, with the older age groups making up a larger percentage of the population than the younger groups. The Kent and Medway Growth and Infrastructure Framework forecast shows an estimated population of 2,127,600 by 2031; an increase of 396,300 people, equivalent to a 23% growth in population from 2011 to 2031¹⁶.

A predicted 178,600 homes are required in Kent between 2011 and 2031 to meet the housing demand.¹⁷ A well-planned green infrastructure that protects important landscapes and access to amenities is key to creating sustainable communities. The demographics of Kent's population will also play an important role in making future decisions, targeting limited resources to deliver the best possible service to meet our customer's requirements and needs and deliver positive outcomes.

Current Travel Patterns

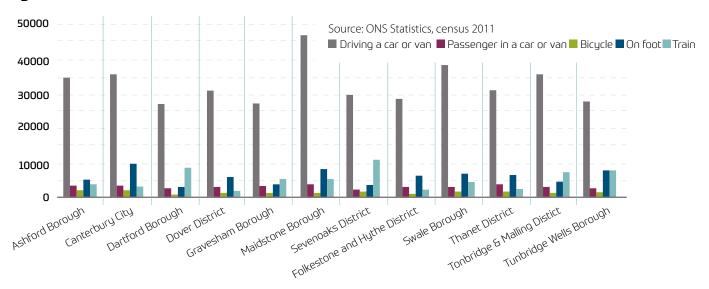
Information available from the Office for National Statistics (ONS) Statistics Census 2011 on the ways that Kent's residents reach work, provides an important insight into travel patterns and where the PROW and Access Service can help encourage more sustainable options. Figure 2 (page 22) focuses on five specific modes of transport used in Kent. Driving to work is by far the most common method used. Although walking to work is the second most popular method for seven of Kent's districts, the remaining districts' second choice was to travel to work by train.

The distance to work can affect the method of travel chosen; people are more inclined to choose walking or cycling for shorter distances. Figure 3 (page 22) shows the distance travelled to work in each of Kent's districts, for a journey that is less than 10km. Encouraging people to leave their cars at home and use active travel methods for shorter journeys will not only provide health and wellbeing benefits to the participant, but will also have a positive impact on the local environment, contributing to reduced road congestion and better air quality. The provision of links that provide access to work, school and facilities is an essential element of a well-planned green infrastructure to facilitate sustainable and active travel.

 $^{^{\}rm 16}$ Kent and Medway Growth and Infrastructure Framework (KCC) 2018 Update

¹⁷ Kent and Medway Growth and Infrastructure Framework (KCC) 2018 Updat

Figure 2 - Method of travel to work



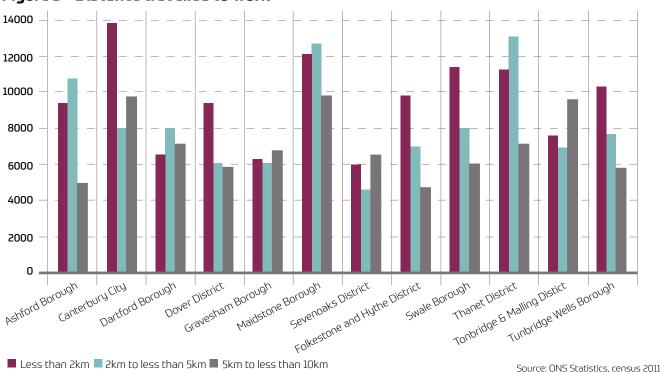
Access to Public Transport

For longer distances, walking and cycling may not be feasible and other methods of travel including bus, car and train will need to be used. The PROW network still plays an important role in providing links to these modes of transport, such as bus and railway stations.

Figures 1 and 2 relate to current travel patterns. There will, no doubt over the duration of this plan, be a continued change to working patterns; increased home working and remote working facilitated by the role out of high-speed internet connections. The continued development and improvement of electric vehicles, autonomous vehicles and even electrically assisted bicycles may revolutionise travel choices.

Through the improvement of the existing PROW network to facilitate active travel for shorter journeys and improving links to transport hubs, we can work towards more sustainable travel patterns in Kent. The PROW and Access Service will use the available transport information to make informed decisions when responding to planning applications and developing provision in growth areas. We recognise there is the potential for a rapid change to working and travel patterns over the duration of this plan and may need to further develop policies as a result.

Figure 3 - Distance travelled to work





Growth Areas

The PROW and Access Service will continue to work with planners and developers to secure PROW enhancements and improvements to the network over the next 10 years in growth areas and associated developments. We will continue to comment on and influence local planning documents, land allocation and master plans through to detailed applications. Comments will reflect National Planning Policy Framework 2018 paragraphs:

- 96 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities' and
- 98 'Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails'.

Use of Spatial Data

The spatial data sets available to the PROW and Access Service have increased over the last 10 years:

This includes data on:

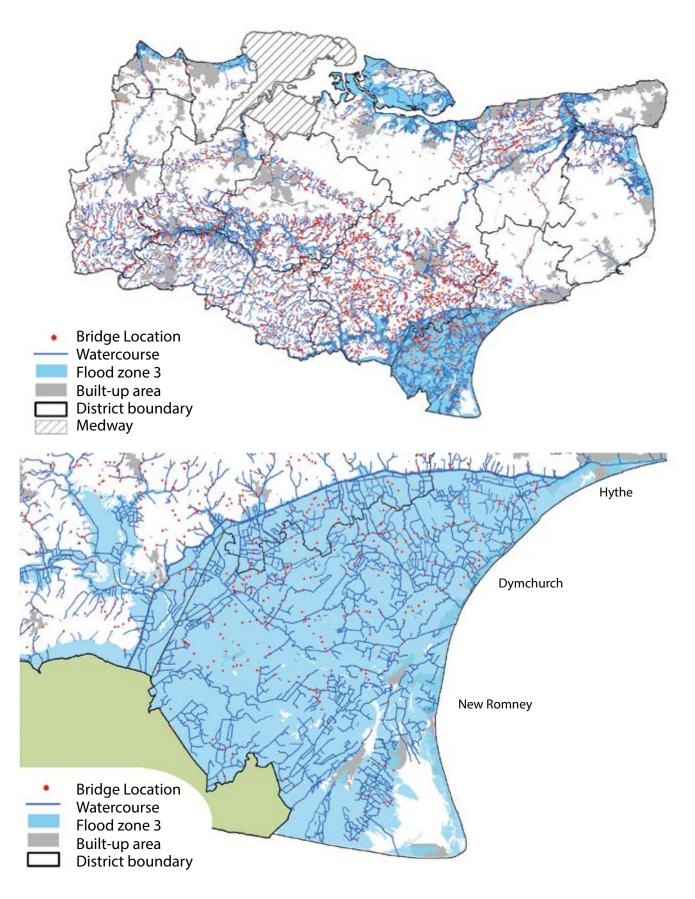
- The PROW network asset
- The PROW network
- Access Land
- Publicly accessible greenspace and coast
- Permissive access
- Highways
- Customer insight MOSAIC.
- Health
- Multiple Index Economic Deprivation
- Travel patterns.
- Links to public transport
- Growth areas
- Flood zones
- Land use
- Points of interest
- Constraints such as Sites of Special Scientific Interest and scheduled ancient monuments

This information can be harnessed to inform decision making about which projects are likely to deliver positive outcomes and how best to design them. Examples of how information that can be used to direct activity are as follows:



Example 1: Safeguarding the PROW Asset

Using flood zone, watercourse mapping and spatial data showing the PROW bridge asset, we can identify those structures at greatest risk and direct activity to safeguard the asset through bridge anchoring, anti-scour works and other protective measures.

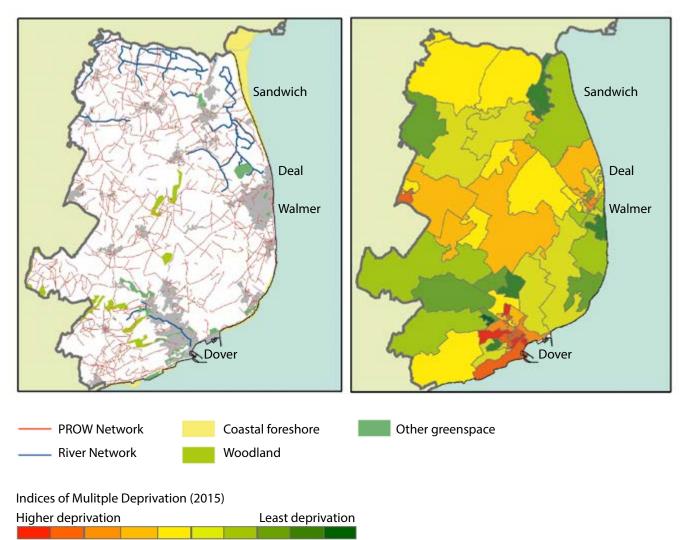


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Example 2: Tackling Health Inequalities through Access to Greenspace

Research has identified a correlation between areas where there is a low prevalence of the population being physically active and low levels of natural green space provision. ¹⁸ Good quality open and green space is important in tackling health inequality and it has been recognised that the availability and quality of access to green space is not evenly distributed.

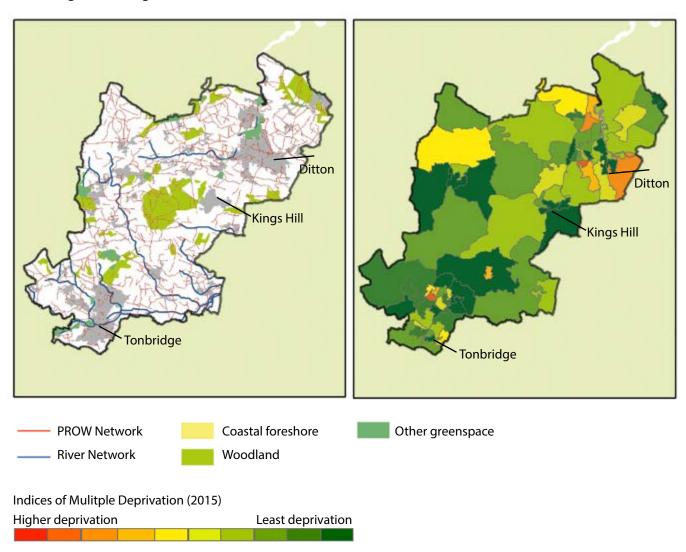
Dover District



^{18 (}Bennett, Davies, Hodgson, Pett, & Witts, 2016)

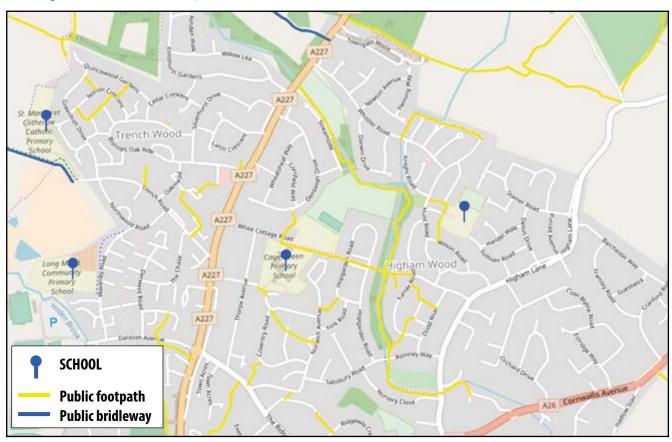
Mapping showing indices of multiple deprivation, access to open and green space and areas of poor health can be compared to inform decision making for future projects, programmes and planning responses, to help encourage active lifestyles and tackle health inequality in Kent.

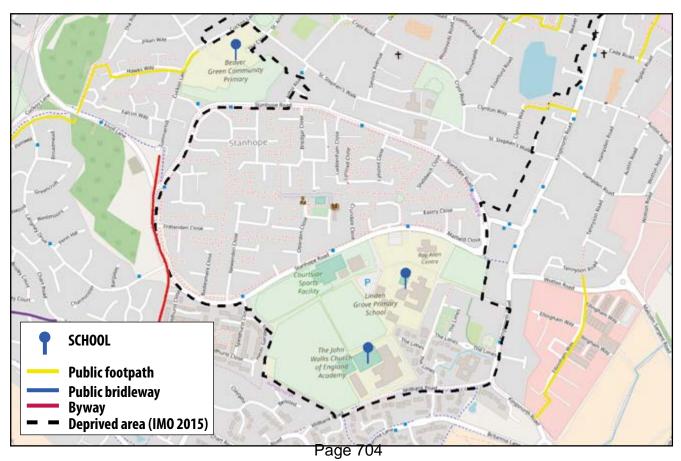
Tonbridge & Malling District



Example 3: Encouraging Active Lifestyles

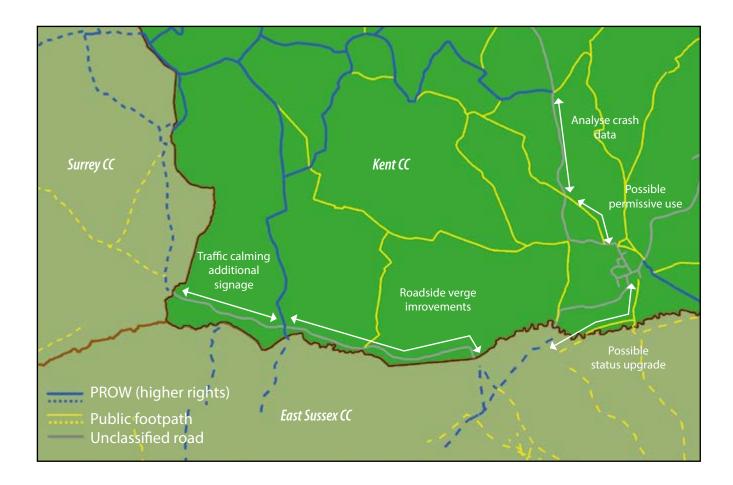
Using spatial data we can identify improvements, linking schools to the wider PROW and cycle network. Information can be further scrutinised to target specific schools and potential links to the network, encouraging active travel and healthy lifestyle choices. The provision and improvement of such links has the potential to unlock great benefits in areas of poor health outcomes.





Example 4: Reducing Fragmentation of the Network and Improving Safety

The example map below demonstrates the power of spatial data in building up a picture of the 'missing links' that could deliver maximum benefit to connectivity. Using multiple datasets e.g. road data, crash statistics, cross-border assets etc. to build up an accurate picture of the local situation, allows the most appropriate options for delivering improvements to be identified. This may be improving the roadside verge; working to improve signage and traffic calming features; trying to establish behind the hedge routes; or, working for permanent or permissive upgrades to existing lower status paths.



Delivery Plan / Statement of Actions

The ROWIP provides valuable insight into the needs and priorities of Kent's PROW network users, what they would like from the Service and how we can improve walking, equestrian and cycling opportunities in Kent. The six key themes that have emerged and the actions required to deliver them, sit well with the themes of the previous ROWIP and ensure the continuity of the service and the assurance that our previous work was well directed. The key themes are not in order of priority or importance, each has a main objective and set of actions that form the basis of the PROW and Access Service's 10 year delivery plan and statement of actions.

Decisions need to be made around how resources will be allocated to best meet our statutory obligations and deliver the improvements that the public desire. This is particularly important when budget and staff resources are under increasing pressure. There is a need to ensure that each programme or project delivers the greatest benefit and aligns most closely with Kent's relevant strategies and policies. Through producing the ROWIP, an evidence base has been developed to support this prioritisation, delivery plan and statement of actions. Evaluation of the plan's effectiveness is also crucial in ensuring that the service is fulfilling identified priorities and needs, both overall and on a project by project basis. The PROW and Access Service will quantify the outcomes and outputs of the plan through an annual review and report throughout the 10 years of the plan.

Key for Benefits

- Supports active travel (reducing congestion, outputs of climate change gases, noise and air pollution)
- Increasing levels of activity leading to better physical and mental health and wellbeing
- **E** Supporting Kent's economy
- Improved customer experience

Key for Resource/Limitation

- **£√** Deliverable with existing resource levels
- **£+** Additional resource required
- **Eg£** Potential for income generation or budget savings

Active lifestyles

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
AL01	Increase Health and Wellbeing Benefits	 Target priority areas and deliver improvements to the network addressing health inequalities through increasing active travel and recreational activity. Prioritise maintenance on those PROW providing access to natural greenspace and public open space or where providing an accessible resource for community-based activities (walking groups, health walks). Improve connectivity and consider equestrian and other parking where reasonable to encourage recreational and leisure activity; including access to country parks, honey pot sites and other facilities of high leisure use, such as National Trails, promoted routes and routes within and leading to AONBs. Support volunteering in greenspace and on PROW network. Work with partners to support implementation of health improvement initiatives, such as Walking for Health, cycling and equestrian initiatives and GP referrals. Support schemes that will contribute to a reduction of air pollution, particularly in those areas where levels are high, and measures of deprivation and health are 	Ø • • • • • • • • • • • • • • • • • • •	£g£ £+ £√	Active Travel Strategy Steering Group Countryside Access Wardens Developers Explore Kent Health Care Providers and Professionals KCC Country Parks KCC Highways Transportation and Waste Kent Downs and High Weald AONB Kent Sport Landowners Local Schools Parish Councils Planning Authorities User and Interest Groups
AL02	Active Travel	 Support and influence local authority strategies and policies to ensure that active travel is firmly integrated into development planning. Work with developers to ensure active travel routes are incorporated and link to PROW / cycle networks, transport hubs and greenspaces. Provide motorised traffic free, safe walking, cycling and equestrian and routes linking to towns, urban and rural areas. Seek to provide longer distance links between urban centres. Remove barriers to active travel and recreation and promote routes and opportunities. For example promote recreational routes to introduce people to active travel and work with KCC's Active Travel Strategy Group to support work with children to develop bike skills, build confidence and en Rage 79.7 	Ø\$0 ▼ £ 1 ©	£g£ £+ £√	Active Travel Strategy Steering Group Developers KCC Highways Transportation and Waste Kent Countryside Access Forum Local Schools Parish Councils Planning Authorities User and Interest Groups

AL03 Tackling Deprivation & Disadvantage	1.11 Remove barriers for economically disadvantaged communities by encouraging the use of the network as a free-at-the-point-of-use resource for active travel, recreation and leisure use.	<pre></pre>	Active Travel Strategy Steering Group Developers Explore Kent
	 1.12 Tackle health disadvantage by promoting access to the natural environment and green space, beyond urban areas, providing connectivity to nature and cultural landscapes. 1.13 Utilise information available on health inequalities, areas of deprivation poor health, high air pollution, and current access to green space to support measures to focus efforts on the areas that will have greatest impact. 1.14 Encourage active travel to schools through promotion and enhancing PROW and cycle networks, targeting areas of childhood obesity and deprivation affecting children. 		Health Care Providers and Professionals KCC Country Parks KCC Highways Transportation and Waste Kent Countryside Access Forum Kent Downs and High Weald AONB Kent Sport Local Schools Parish Councils Planning Authorities User and Interest Groups

Evolution of the network

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
EN01	Modal Shift to Cycling and Walking to Reduce Road Air Pollution	 2.1 PROW network to provide realistic traffic free alternative to the car especially for short journeys to keep towns moving at peak flow times. Provide routes to encourage walking & cycling as a realistic mode of transport for utilitarian purposes as well as for leisure use. 2.2 Improve and upgrade the PROW network where it links with amenities, public transport nodes, work and education to increase the attractiveness of walking, cycling and riding as an alternative to driving. 2.3 Work with planners to secure PROW within green space and green corridors which actively ameliorate air pollution. 2.4 Further develop policies and projects in line with changes in working and travel patterns over the duration of the plan. 2.5 Work to secure higher status routes (bridleway, restricted byway) to provide access for the greatest range of users. 	Ø ► E ©	£g£ £+ £√	Active Travel Strategy Steering Group Developers Explore Kent KCC Highways Transportation and Waste Kent Countryside Access Forum Local Schools Parish Councils Planning Authorities User and Interest Groups

EN02	Improve Green Infrastructure	 2.6 Work with planners and developers to create a planned strategic green infrastructure which incorporates the PROW network to promote and encourage sustainable, active travel and provide opportunities for leisure and recreation. 2.7 Work with stakeholders to create places where people are not impeded in undertaking physical activity, accessing nature and having low air pollution levels. 2.8 Support improved communication with planning officers to ensure access is integrated into developments and best practice is applied. 2.9 Maintenance and improvements will be designed to be in keeping with surrounding environment. For example a tarmac path would not be suitable choice through a woodland habitat. 	Ø. ₩ ₩ ₩ ©	£g£ £+ £√	Active Travel Strategy Steering Group Developers KCC Highways Transportation and Waste Kent Countryside Access Forum Landowners Parish Councils Planning Authorities User and Interest Groups
EN03	Safe Travel	 2.10 Maintain the PROW network to support safe and easy travel. 2.11 Work in partnership to provide new and upgraded routes in areas of evidenced need and to encourage use through well designed safe routes. 2.12 Look to improve safety of railway and road crossings where possible, working with Highways and PROW partners. 2.13 Maintain highway verges and unsealed unclassified highways to improve the connectivity of the PROW network. 2.14 Identify and support policies and measures that seek to reduce traffic speed and volume where this will preserve or improve network connectivity for non-motor vehicle users. 	Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø	£g£ £+ £√	Developers KCC Highways Transportation and Waste Kent Downs and High Weald AONB Kent Sport Kent Wildlife Trust Landowners Network Rail Parish Councils Planning Authorities User and Interest Groups
EN04	High Standard Good Design Routes	 2.15 iaising with disabled user groups and organisations, use expert knowledge and experience to update existing Kent Design standards for specific user groups. 2.16 Establish and share design standards for specialist users and incorporate these design standards where it is appropriate to do so for new and existing PROW. (A higher standard of maintenance programme will be required for such routes and can be applied when funding is available). 2.17 Establish and share general good design standards and guidance for use for KCC and local authorities in developing the network including access to specialist engineering skills and knowledge base in the design, improvement and upgrade of PROW. 	Ø ₹ € € € € € € € € € € € € € € € € € €	£g£ £+ £√	Developers KCC Highways Transportation and Waste Kent Countryside Access Forum Landowners Parish Councils Planning Authorities User and Interest Groups

EN05	Strategic Overview	2.18 Looking at the available PROW network and the barriers preventing use, take a strategic overview to provide more relevant shared use routes and better links and access to facilities where needed.	5√0 ♥ £ ©	fgf f+ f√	Active Travel Strategy Steering Group Developers KCC Highways Transportation and Waste
		 2.19 Strengthen partnership working with stakeholders and planning bodies to make better sense of the network and provide a well maintained safe, pleasant environment based on customers priorities, needs and choices. 2.20 Work closely with District/Borough and Parish Councils to ensure PROW input into Local and Neighbourhood Plans. 			Kent Countryside Access Forum Landowners Parish Councils Planning Authorities User and Interest Groups
EN06	Environmental Impact and Mitigation	 2.21 Identify climate change impact and mitigation measures. 2.22 Use data available on air quality to prioritise projects and schemes to help towards improving the local environment. 2.23 Identify flood risk areas and likely impact on PROW network and put in place mitigation measures. 	Ø\$\ ¥ £ ③	£g£ £+ £√	Active Travel Strategy Steering Group Developers KCC Highways Transportation and Waste Kent Countryside Access Forum Kent Environmental Strategy Kent Resilience and Emergency Planning Landowners Parish Councils Planning Authorities User and Interest Groups

Knowing what's out there

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
1	Maintain the Record	 3.1 Maintain and update the county's Definitive Map and Statement of Public Rights of Way, Register of Common Land and Village Greens and their associated schedules. 3.2 Ensure that the Definitive Map and Statement are easily accessible. 3.3 Encourage stakeholders to submit applications that ensure that rights of way are preserved prior to legislative changes which are due to come into force on 1 January 2026. 	Ø\$0 ♥ € ©	£√	

KT02	Better Promotion	3.4	Promote the benefits of active travel to encourage this type of use and relate it to the most popular response when we asked why PROW are used (to go for a	Ø\$© ♥ Œ	£g£ £+ £√	Active Travel Strategy Steering Group Countryside Access	
			walk / run / cycle / be active / healthy)	☺		Wardens	
		3.5	Promote specific types of network use,			Explore Kent	
			where there are suitable equestrian and cycle routes to encourage this type of			Health Care Providers and Professionals	
		26	use which is currently low.			KCC Country Parks	
		3.6	Working with key partners seek to improve promotion of PROW and cycle network, highlighting new and improved			KCC Highways Transportation and Waste	
			routes, shared use and higher status routes. Improve type of information			Kent Countryside Access Forum	
			available online i.e. destination, length and difficulty of route.			Kent Downs and High Weald AONB	
						Kent Sport	
						Libraries	
						Local Schools	
						Parish Councils	
						Planning Authorities	
						User and Interest Groups	
KT03	Sustainable				Ø₩	£g£	Explore Kent
	Tourism		♥ ±	£+	KCC Country Parks		
			businesses, thereby supporting Kent's small business sector.	©	£√	Kent Countryside Access Forum	
		3.8	Develop access which does not conflict with nature conservation interest and			Kent Downs and High Weald AONB	
			support mitigation measures which may require recreational pressure to be			Libraries	
			diverted from sensitive sites.			Local Businesses	
		3.9	Provide information to help support			Parish Councils	
			community led tourism.			Planning Authorities	
		3.10	Increase length of stay through packaging, linking and developing			User and Interest Groups	
			new products (e.g. new routes or new promoted routes). Promote the resource widely to target short break audiences.			Visit Kent	
KT04	A Strong	3.11	Use PROW and countryside access to	Ø\$0	£g£	Explore Kent	
	Brand for Kent		strengthen <i>Kent – The Garden of England</i> brand of Kent as a whole and in local	Y	£+	KCC Country Parks	
	(Encouraging visits to Kent)	3 1 2	areas. Maintain primary promoted routes to a	4 ©	£√	Kent Countryside Access Forum	
		3.12	high standard to safeguard Kent's high- quality reputation for countryside access.			Kent Downs and High Weald AONB	
		3.13	Developing new products (e.g. new			Libraries	
			routes or new promoted routes) taking a strategic view of Kent's needs and			Local Businesses	
		a strategic view of markets.	9			Parish Councils	
						Planning Authorities	
					User and Interest Groups		
						Visit Kent	

KT05	Promotion	3.14 Establish trail partnership for England	Ø\$€	£g£	Explore Kent
	of National Trails	Trails	Y	£+	KCC Country Parks
	l l l l l l l l l l l l l l l l l l l	3.15 Promote National Trails, North Downs Way and England Coast Path as visitor destinations.	£ ©	£√	Kent Countryside Access Forum
		3.16 Using external funding Improve National Trail branded signage.			Kent Downs and High Weald AONB
		man branded signage.			Libraries
					Local Businesses
					Parish Councils
					Planning Authorities
					User and Interest Groups
					Visit Kent
KT06	Grow New	3.17 Improving priority routes which facilitate	<i>₫</i> ₽	£g£	Explore Kent
	Markets	horse riding, cycling and walking for more targeted tourist leisure and	Y	£+	KCC Country Parks
		recreational use. 3.18 Support development of growing sectors such as adventure sports and active leisure.	± ©	£√	Kent Countryside Access Forum
					Kent Downs and High Weald AONB
		3.19 Create bespoke and "off the peg" walking			Libraries
		itineraries for domestic and overseas markets. Promote the Kent Countryside North Downs Way as a viable day, short break or rural tourism destination.			Local Businesses
					Parish Councils
					Planning Authorities
					User and Interest Groups
					Visit Kent
KT07	More Accessible	3.20 Tailor information to reach the widest range of customers (online, phone apps,	Ø\$6 ♥	£g£ £+	The Duke of Edinburgh's Award
	Information / Increasing	maps and guides), including specific groups, young to old age groups and	£	£√	Explore Kent
	Knowledge &	visually impaired and disabled user	☺		KCC Country Parks
	Confidence	groups.			KCC Youth Services
		3.21 Reach specific groups that lack confidence and knowledge of PROW such as the non-users, under-			Kent Countryside Access Forum
		represented age groups and those that indicate they have a disability.			Kent Downs and High Weald AONB
		3.22 Target approach to reach PROW			Libraries
		non -users, improving accessibility of information to spark interest in			Local Businesses
		walking / cycling and horse riding,			Parish Councils
		increase knowledge and confidence to encourage use.			Planning Authorities
		3.23 Make information more accessible for			User and Interest Groups
		BAME groups and ensure promotional material will be appropriately targeted to BAME groups and provided in alternative formats and languages as necessary.			Visit Kent

KT08	Keep Communica- tion Open	3.24 Retain community involvement as a key element of service delivery.3.25 Liaise with planning authorities and	Ø\$\ ♥ Œ	fgf f+ f√	Explore Kent KCC Country Parks
		developers, look at key development areas and potential gains to the network specific to each group.	©		KCC Youth Services Kent Countryside Access Forum
		3.26 Provide updates about specific improvements to user groups.			Kent Downs and High Weald AONB
					Libraries
					Local Businesses
					Parish Councils
					Planning Authorities
					User and Interest Groups
					Visit Kent

Well-maintained network

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
MN01	Better Network for Leisure and Daily Use	 4.1 Further improve the performance of the vegetation clearance contract across the county. (A higher standard of maintenance will be required for higher priority routes, which can be applied when funding is available). 4.2 Work with local authorities and volunteers to target activity to improve the amenity of urban routes, remove litter, graffiti and dog fouling which acts 	Ø⁄® ♥ Œ ©	Eg£ £+ £√	Contractors Countryside Access Wardens KCC Country Parks Kent Countryside Access Forum Kent Downs and High Weald AONB
		as barrier to use. 4.3 Target surface maintenance programmes to encourage the use of PROW for daily walking, cycling, riding especially in urban areas and for short journeys. Prioritise those routes particularly suited to wider use of the network. 4.4 Improve general fingerpost and waymarking maintenance to encourage use and build confidence, prioritising areas with high leisure use. Promote and provide better signed circular routes to increase confidence in wider use.			Landowners Parish Councils Planning Authorities User and Interest Groups

MN02	A Strong Brand for Kent (Priority routes include promoted routes and links to key facilities)	4.5	Maintain National Trails, trail corridors and promoted routes to a high standard to safeguard Kent's high-quality reputation in countryside access. Maintain high priority routes to facilitate horse riding, cycling and walking for more targeted tourist leisure and recreational use.	Ø\$© ▼ €	£g£ £+ £√	Explore Kent KCC Country Parks Kent Countryside Access Forum Kent Downs and High Weald AONB Libraries Local Businesses Parish Councils Planning Authorities User and Interest Groups Visit Kent
MN03	PROW Asset Management Plan	4.8	Use the PROW Asset Management Plan approach to make informed decisions for programme and project delivery.	Ø**© ♥ Œ	£√	
		4.9	Annually review and update the PROW Asset Management Plan throughout the 10 year plan, reflecting network and structure inspections and public reports.	©		
MN04	The Intelligent Investment Tool		Use the Intelligent Investment Tool, a simple cost benefit analysis approach to make informed decisions for programme and project delivery. Annually review and update the	Ø\$© ♥ € ©	£√	
			Intelligent Investment Tool throughout the 10 year plan.			

Rights with responsibilities

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
RR01	Provide Advice on PROW Network	 5.1 Provide advice and guidance to landowners. 5.2 Liaise with Planning Authorities and Parish Councils to provide advice on Local Plans and the inclusion of PROW improvement projects and provision in Neighbourhood Plans. 	<i>\$</i> \$6 ♥ ± 3 ©	£g£ £+ £√	Country, Land and Business Association Developers KCC Highways Transportation and Waste Kent Countryside Access
		 5.3 Attend meetings and workshops for large developments getting PROW input into the overall site design at early stage. 5.4 Provide advice on planning applications. 5.6 Advise on, and, where appropriate, progress orders to amend the PROW network in the interest of the public and or the landowner. 			Forum Landowners Land Managers National Farmers Union Parish Councils Planning Authorities User and Interest Groups

RR02	Negotiate Improve- ments	 5.7 Work with landowners to deliver improvements to the PROW network to increase accessibility and encourage active travel and active recreation, leisure use and the local economy. 5.8 Secure any opportunities that arise from changes to the regime of agricultural and land management subsidies. 	Ø\$© ♥ ± ©	£g£ £+ £√	Country, Land and Business Association Kent Countryside Access Forum Landowners Land Managers National Farmers Union Parish Councils Planning Authorities User and Interest Groups
RR03	Compliance	5.9 Work with landowners to ensure higher levels of compliance with their obligations in respect of PROW. Take enforcement action where required to ensure PROW is open and available to the public.	Y £ ③	£+ £√	Country, Land and Business Association Landowners Land Managers National Farmers Union
RR04	Increase Accessibility of the PROW Network	 5.10 Continue to uphold our policy of least restrictive access. 5.11 Utilise new data showing how many stiles are present on each route to target removal for the greatest impact. 5.12 Seek to reduce the number of barriers to use such as steps and narrow gates. 	Ø\$© ♥ £ ©	£+ £√	Country, Land and Business Association Landowners Land Managers National Farmers Union User and Interest Groups
RR05	Promote Responsible Use	 5.13 Working with key partners to prevent conflict between different user groups. 5.14 Work towards and support responsible use of the network to address local issues such as anti-social behaviour and dog fouling. 5.15 Support measures designed to prevent or reduce anti-social and criminal behaviour while preserving public access. 5.16 Working with stakeholders to minimise impact of use on sensitive areas i.e. SSSI and scheduled monuments. 	Ø\$\\ \ \ \ \ \ \ \ \ \ 	£√	All Partners

Efficient delivery

Ref Code	Objective	Action	Benefit	Resource / Limitation	Key Partners
ED01	Volunteers	 6.1 Continue to develop the Countryside Wardens Scheme expanding the roles of individual wardens. 6.2 Link with Sustrans Rangers to ensure that the cycling network is adequately covered. 6.3 Continue to develop volunteer programmes that support the delivery of the objectives of the ROWIP. 	Ø\$© ♥ Œ ©	£g£ £+ £√	Countryside Access Wardens Explore Kent Kent Countryside Access Forum Landowners Land Managers Parish Councils User and Interest Groups

ED02	Improved Customer Service	6.4	Through feedback identify improvements relating to customer service.	♥ ©	£√	Countryside Access Wardens Explore Kent
		6.5	Deliver the needs of customers through developing new routes and improvements in areas of demand using data from CAMS and MOSAIC.			Kent Countryside Access Forum Parish Councils
		6.6	Continue to make improvements to reporting system in line with customer requests identified through review process.			User and Interest Groups
		6.7	Provide the customer with a range of methods of reporting an issue to the appropriate body.			
ED03	Increase Awareness of ROWIP	6.8	Raise awareness of the ROWIP to customers, non- users of the network and stakeholders.	Ø® ♥ € ©	£√	All Partners
ED04	Working in Partnership	6.9	Strengthen partnership working with key stakeholders including land managers, planning bodies, local authorities and Parish Councils to make better sense of the network and provide a well maintained safe, pleasant environment.	Ø\$© ♥ € ©	£g£ £+ £√	All Partners
		6.10	Work in partnership with neighbouring County Councils' to ensure cross county boundary improvement projects take place where they provide benefits to the local communities.			
ED05	PROW Network Links to Encourage Sustainable	6.11	Utilise the available transport information to make informed decisions when responding to planning applications and developing green infrastructure for growth areas.	Ø® ♥ £ ©	£g£ £+ £√	All Partners
	Travel	6.12	Establish potential links to the highway network. Make information available to Officers to assist with making informed decisions on planning applications and other projects.			
		6.13	Use fragmentation analysis to identify where higher status routes link to quieter, less well used roads to improve network connectivity.			
		6.14	Establish potential links on road verges, where quieter roads are not available.			
ED06	Programme and Project Assessment	6.15	Consider various data tools and data sets when assessing programmes and projects and when responding to development consultations. Including ORVal Welfare Value, Physical Activity Data Tool.	Ø\$© ▼ Œ ©	£g£ £+ £√	
		6.16	In identifying programmes and projects that deliver the objectives of this plan, design will, where feasible include targets that are measurable.			

ED07	Secure Additional Funding	 6.16 Seek to maintain and improve the delivery of the PROW and Access Service through charging for activity where admissible. 6.17 Seek additional funding to maintain the current network and deliver targeted improvements to routes in line with the ROWIP. 6.18 Seek opportunities work jointly to secure funding for key promoted routes, National and International trails. 	Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø Ø	£g£ £+	Active Travel Strategy Steering Group Developers Explore Kent KCC Country Parks KCC Highways Transportation and Waste Kent Countryside Access Forum Kent Downs and High Weald AONB Local Businesses Parish Councils Planning Authorities User and Interest Groups
ED08	Operational Policy	6.19 Review operational policies and priorities in light of the adopted policies and objectives in this plan.	Ø\$0 ♥ Œ	£9£ £+ £√	
		6.20 Periodically review operational policies in response to legislative change.	☺		
		6.21 Provide PROW Officers and volunteers with the training necessary to ensure effective delivery of PROW operations.			

Glossary

AONB Area of Outstanding Natural Beauty BAME Black, Asian and Minority Ethnic

BOAT Byway Open To All Traffic

CAMS Countryside Access Management System

CAW Countryside Access Warden

CROW Countryside Rights of Way Act 2000

DEFRA Department for Environment, Food & Rural Affairs

DH Department of Health

DMS Definitive Map and Statement

ECP England Coast Path
EH English Heritage
FC Forestry Commission

KCAF Kent Countryside Access Forum

KCC Kent County Council LTP Local Transport Plan

MENE The Natural England Monitoring Engagement with the Natural Environment

MOD Ministry of Defence

MOSAIC Mosaic is Experian's powerful cross-channel consumer classification designed to help

understand the demographics, lifestyles, preferences and behaviour of the UK adult

population in great detail

NDW North Downs Way
NE Natural England

NHS National Health Service

NICE National Institute for Health and Care Excellence

NT National Trust

ONS Office for National Statistics

ORVal Outdoor Recreation Valuation tool

PROW Public Rights of Way

ROWIP Rights of Way Improvement Plan SSSI Site of Special Scientific Interest

TRO Traffic Regulation Order WHI Walk for Health Initiative

Stakeholders, User and Interest Groups

The list below includes user and interest groups (this is by no means a complete list).

AUK Age UK

BHS British Horse Society

BDS British Driving Society – representative body for carriage driving

CLBA Country Land and Business Association

CUK Cycling UK

DR Disabled Ramblers

KAB Kent Association for the Blind KCAF Kent Countryside Access Forum

KWT Kent Wildlife Trust

LARA Motorised Organisations' Land Access and Recreation Association

OSS Open Spaces Society
NFU National Farmers Union

RA Ramblers SE Sport England

SUSTRANS Sustainable Transport Charity

TRF Trail Riders Fellowship
U3A Groups University of the Third Age

WfA Wheels for All, The national Inclusive Cycling Charity

WT Woodland Trust

WW Wheels for Wellbeing

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Appendix C Summary of ROWIP Draft Public Consultation Results

Who responded to the public consultation?

The majority of the people that responded were Kent residents with a total of 259 others included:

- A Parish / District or County Councillor (24)
- Parish / Town / District / County Council in an official capacity (17)
- Local community group or residents association (10)
- A charity, voluntary or community sector organisation (VCS) (11)
- As a PROW volunteer (11)
- As a member of KCC staff (7)
- A visitor to Kent (4)
- On behalf of an educational establishment (1)
- A local business owner (1)

Other each with one entry: (8)

Q3. Do you currently use Public Rights of Way (PROW) in Kent?

Q3. Do you	Yes	No	Don't Know
currently use Public Rights of Way in Kent?	287	4	6

Q4. If you answered Yes to Q3, how often do you use Public Rights of Way in Kent?

If you answered Yes to Q3, how often do you	Once a day	At least once a week	At least once a fortnight	Once a month	Less often
use Public Rights of Way in Kent?	90	134	26	21	16

Q5. Was the ROWIP document easy to understand?

Q5. Was the ROWIP	Yes	No	Don't Know
document easy to understand?	309	23	16

The majority of the comments received when asking this question was that the document was well laid out with lots of clear information, with 309 of people finding this. Negative comments included the use of jargon and that it was rather long and not very specific in the delivery plan actions with no specific or actual targets, no commitment given on action or to deal with shortcoming of the PROW network.

Q6. To what extent do you agree or disagree that we have identified the correct themes?

To what extent do you agree or disagree that we have identified the correct themes?	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
	180	151	23	6	2	0

Comments were made that the themes do not challenge priorities in a period of limited resource; for example the balance between urban or rural projects, and between maintenance of existing assets versus investment in new connections in the network. Also that we place high priority on the maintenance of the existing network but seek ways to improve connectivity especially when new development takes place.

Q7. To what extent do you agree or disagree with each of our six themes?

There was some confusion over the order of the six themes and people thought that we had ordered them due to their priority and importance. People tended to disagree with the order that the themes were prioritised rather than objecting to the themes themselves.

Other comments made

The themes concentrate on the larger more prominent PROW to the detriment of issues concerning smaller but important local footpaths and bridleways.

To what extent do you agree or disagree with each of our six themes?	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Don't know
Active Lifestyles	220	104	14	5	4	1
Evolution of the Network	176	126	30	6	5	3
Knowing whats out there	222	86	27	9	4	0
Well-maintained Network	265	61	10	5	5	0
Rights with Responsibilities	197	104	29	4	4	3
Efficient Delivery	179	122	33	5	4	2

General Comments

Active lifestyles

References to a longer distance network for active travel are too vague. There needs to be a much stronger commitment to building a network of protected active travel routes within and between urban centres. E.g. a high-quality cycle route linking Maidstone, Paddock Wood and Tonbridge along the Medway to the existing cycle route through to Pembury and Tunbridge Wells is easily achievable and would be really beneficial.

Evolution of the network

EN03 Safe travel - Safety Issues

- Include Public Safety
- Connecting existing routes together and improving the safety on existing routes is not something that is mentioned. By targeting these two areas the greatest benefit could be achieved for the money spent. A key part of this must be to give pedestrians and cyclist priority when crossing roads.
- Could not find any reference to increasing safety using PROW in urban areas, especially to the use/upgrading of lighting where appropriate. These should be fed in too.

- We agree the six themes identified but suggest creating a 7th "USER SAFETY". Fear
 of traffic speeds and pollution does not appear in your research, yet this is known to
 be a major disincentive to walking and cycling in both urban and rural areas. This is
 certainly our experience in Royal Tunbridge Wells and no consideration of PROW and
 other places where people walk and cycle can be made without recognising the
 detrimental impact of motor vehicles.
- The USER SAFETY theme should be high priority where PROWs and other paths run beside or across roads of various grades or where different types of users share the same 'road' space in both urban and rural areas. Mandatory safety measures such as 20mph zones, speed restrictions, signage, safe crossing places with refuges or user-controlled lights, should be among the measures employed as standard. USER SAFETY should be integral to the local borough and county planning and development processes.
- The USER SAFETY theme would also cover a requirement to separate pedestrians and cyclists from motorised traffic on segregated or shared paths particularly on busy A and B roads and on all rural roads where local users (and potential users) require it for their safety. Typical situations would be footpaths/shared cycle ways from residential areas to the local primary and secondary school and community centre.

Traffic Issues

PROWIP fails to recognise KCC's substantial maintenance and public safety liabilities of permitting off-road sport use of such BOATs.

Safety for users not addressed. Footpaths are dissected by very busy dangerous roads with no safe way to cross.

Fragmentation of the network is an important, complex and previous neglected area. It must be examined holistically - 'highways and byways' together. People can no longer walk where they once did because lanes have become carriers of large numbers of fast-moving vehicles.

Link paths to avoid walking on dangerous roads.

In NW Kent car journeys are prioritised with the extensive development of the road network aiding this, we need to look at PROW as sustainable transport not just for leisure and fitness.

We are concerned that local roads which are popular cycle routes are unsafe, particularly because of erosion at the edge from poor drainage and heavy vehicles. We would welcome better coordination of drainage and surface maintenance on key routes.

Knowing what's out there

Information on the footpath network is widely available and the Parish Council values the on-line 'fault reporting' tool. It would be helpful if the definitive footpath map were available on-line in its own right, and not only as part of that tool.

Rights with Responsibilities

Enforcement of the law needs to be strengthened.

RR05 Promote Responsible use: Illegal Use and Anti-social Behaviour

Illegal use and damage by 4 x 4 's and trail bikes in Kent destroying access to walkers and fragmenting the footpath network has not been recognised. Concerns that the very good ambitions could not be achieved in a period of austerity.

We welcome the emphasis on improving access for non-motorised users to the network in this draft ROWIP, and the omission of the motorised vehicle objectives which were included on page 63 of the 2013-17 ROWIP.

The volumes of motor bikes and cars using BOATs cause continual damage that KCC cannot afford to maintain resulting in closure. Second use by vehicles prevents walkers and horse riders using some BOATs causing excessive surface damage and damage to surrounding land. These obvious themes are not addressed.

The small proportion of the network that comprises byways and UCRs is not addressed in the plan. Issues are - inadequate maintenance especially where damage caused by farm vehicles/ 4x4s; relentless removal of rights in favour of making ancient byways vehicle free to save money on maintenance; inappropriate focus on local objections based around property ownership against protection of a national leisure resource; inadequate responses from KCC staff to obstruction and maintenance reports. I'd support an approach which promotes motorcycle use of byways and UCRs even if 4x4s are restricted.

Maintenance

More regular maintenance required for use by all abilities.

Maintenance has to have highest priority.....if PRoWs can't be used then the rest is meaningless.

Effective maintenance and extension of the network outweigh the other actions put together.

Current PROW vegetation clearance is too infrequent and is ineffective. Even urban paths, key to school access etc, are cut to infrequently.

When cutting is done trimmings are just left to rot causing path metalling to be covered and posing a puncture threat to cyclists. Cutting is done to the minimum so brambles soon grow across paths again. Shoddy.

At this point in time there are a lot of brambles and overgrown stiles that older people cannot climb over which can restrict their exercise and active lifestyle.

At the present time maintaining the network needs to be moved up the agenda as in some areas, stiles, bridges etc are in a poor state of repair even after they have been reported to PROW.

Royal Tunbridge Wells has a wealth of PROW, public footpaths, other paths, back allies, shared pedestrian/cycle routes and extensive Commons - Tunbridge Wells and Rusthall — within its urban centre and residential areas. Despite being well used and a vital part of the character and function of the town centre, these assets don't all enjoy the same protection in law or have the requirements to maintain them for continued and accessible use. Administratively connecting these various assets and maintaining and signing them to a common standard would be beneficial.

Efficient delivery

Volunteers

The appeal for volunteers in 2014 has not been successful. It is not appropriate to expect small teams of volunteers (often senior citizens) to tackle overgrown PROWs using only hand-tools.

Suggested changes

Kent's Economy

With the comments regarding the economic value of the PROW network to the local economy, there is little mention within the actions of our engagement with those very businesses that will benefit-joint working, them contributing back etc.

Brexit

No mention of Brexit?

The plan is a sound document and helpful, it may however have missed an opportunity to be more forward looking and ambitious. While there is significant uncertainty as we prepare to leave the European Union there is also opportunity, we think that the plan could make

more of the opportunities for instance in post Brexit Environmental Land Management Schemes, early documents from Defra would seem to show us that the very considerable resource that is currently spent will be retained and there is an increasing emphasis on benefiting the public good, there is also several specific mentions of promoting access to the landscape. We think that there is a significant opportunity to seek new and significant investment, working in partnership with farmers and land owners/ land managers to raise the quality of public rights of way management through investments from these schemes. Clearly this would have to be above the minimum statutory requirement but we would propose really exciting new access provision along some public rights of way, perhaps with new connective permissive paths so that the public and benefit from visiting and enjoying the landscape – and benefit their health, wellbeing and the rural economy at the same time as potentially offering a new income stream to farmers and land managers.

Types of PROW

Urban and rural PROWs serve different functions and have different needs which need to be distinguished in KCC's PROWIP.

- The two have different uses, functions, and benefits.
- Urban PROWS are an alternative means to get from A to B, may be used more frequently, and make a greater contribution to physical health.
- Rural PROWS are destinations in their own right, and make a greater contribution to well being and tourism.
- Each needs a different plan and strategy.
- Urban costal PROWs maybe both.

Conflict between Users

- ROWIP does not address conflict between different uses.
- Cyclists using footpaths instead of bridleways create quagmires.
- Cyclists without bells endangering walkers.
- Shared use routes put me off walking.

Insurance Liabilities

KCC's consequent maintenance and insurance liabilities are not recognised. ROWIP fails to mention the impediment of current legislation which leaves KCC carrying the can, in the public view of incompetent management, excessive maintenance costs, and insurance liabilities.

Funding and Finance

There were concerns that this detailed Improvement Plan does not have a similarly detailed budget or budgetary priorities attached to it. It also does not explain where additional resource identified by £+ would come from, or how County level aspiration as expressed in this Improvement Plan and local need and demand will be fulfilled.

Funding for maintaining prows is very limited and unlikely to increase significantly in the foreseeable future. KCC cannot be criticised for this. However, management must adequately take account of this difficulty.

Requires information on financial expenditure and sources of revenue, residents need to know costs in their area, local priorities, current and future projects.

We welcome the aspirations in the document, but are disappointed by the lack of detailed actions and, in particular, the budget in order to realise the stated aspirations

It appears that all listed target areas require the full range of inputs, including financial ones. Is there a way of prioritising these?

Ecology

More reference to the nature/ecology/wildlife to which the network facilitates access and among which it passes should be made. Such considerations should apply to efforts to exclude uses of the network which are merely enjoyable to users (e.g. motorists and motorcyclists) and not to other users and the wildlife along the PROW and in its vicinity, and which damage the PROW itself.

Equestrian Use

Too simple to describe what's needed to improve rights of way especially for equestrians. In spite of the last ROWIP very little has been accomplished for equestrians 7% of population taking healthy exercise!

Equestrians don't want to be 'pushed' into specific routes.

Horse friendly pubs – could these be added to Explore Kent maps? A good business opportunity which would certainly encourage use of the surrounding network (Hook and Hatchet at Hucking is a good example of this). Horses Welcome B&Bs (an approval system for these already exists with BHS) and these, along with horse friendly pubs, etc.

Routes must be multi user. Routes need to be continuous, circular and safe. Must not be to the detriment of legitimate users and should not be the responsibility of the PROW team. Height especially important for disabled riders or older riders who may be less flexible. 4.3 Not tarmac please outside of towns!

Those areas with the best off road networks for equestrians become most densely populated as riders move there or move their horses there.

There has been talk of "slow roads" creating them either by benign neglect or by signing and marking and reducing speed limits. This would certainly help. The original "Quiet Lanes" in parts of the country would also benefit from this treatment and would provide useful links between bridleways for many equestrians and leisure cyclists.

Presentation & Structure of Document

A clear definition of a right of way at the beginning is required.

The current legal distinction between PROW and other paths crossing public parks and open spaces, commons and other sites is confusing and generally not understood by those who use them. It results in a disjointed approach to route planning, maintenance, ownership of responsibility and funding.

Delivery Plan

A lot of overlapping.

We welcome the aspirations in the document but are disappointed by the lack of detailed actions and, in particular, the budget in order to realise the stated aspirations.

There are FAR TOO MANY actions listed. You should (a) have less, and (b) prioritise them very clearly and fund them accordingly.

There is no way all these actions will be delivered with the resources you currently have.

Maps

Maps need to be larger

Some confusion over data maps.

Comparing the new plan to the previous plans

I felt you needed to differentiate more clearly between the previous plan, all the research and then what you hope to achieve in the next ten years.

Would be good to have a concise "what we are planning to do/ do different" section that clearly summarises changes to previous plans - placed early within the document with the option of looking at details in later pages.

Index and Glossary - Needed a clearer index so people could go to sections that concerned them.

Design - Please note, as one ages it is not so easy to see small and faint type e.g. p12 bottom left pale type on white is very hard to read so are the footnotes on pages31 -39 the second column 'Objective some of the type is very pale, especially relating to section 2. I realise you are trying to coordinate the colour of the type with the colour of the heading, but maybe you consider ameliorating this feature in future documents in order to facilitate reading by older people and those with poor eyesight.

Key Partners

The key partners are listed as part of the actions; it would be helpful to include an explanation of the process of engagement with those key partners.

The Trans European Trail (TET), aimed at responsible motorcycle touring using tarmac and legal trails, runs through Kent. This will bring additional tourism into the area, including visitors from overseas. The impact on byways/ UCRs in terms of user numbers ought to be relatively small. The TET organisers have been collating information on the positive benefits this will bring. I hope local authorities would welcome this development and support it.

We are disappointed to see no mention of Kent Ramblers amongst the Key Partners in view of the work we do to promote walking in Kent and we hope you will agree to remedy this. We would like to discuss with Kent County Council how we might work in partnership to promote walking in Kent generally and along the many fine but little-used named routes in particular. While Explore Kent has focused on the on-line promotion of walking in Kent, Kent Ramblers could complement that work by helping to fill the considerable gaps in printed promotion. We might also be able to assist with funding for interpretation boards and waymarking improvements.

As far as your Delivery Plan is concerned it would be appreciated if you could give the Ramblers a few mentions. We've established a good relationship with KCC's PROW teams as far as shared maintenance is concerned. The Open Spaces Society also has a feed in on PROW diversion applications. Potentially relevant (to the Ramblers), but not necessarily exclusive aspects of your Delivery Plan "Key Partners" are KT04, MN01, RR01 (5.6), EN03 etc., ED01, ED02 & ED04 More generally we would like to see our contribution to the walking environment in Kent better recognised, not least the work we do on vegetation clearance and other aspects of path maintenance.

Parish mentioned as partner but we have never been contacted hopefully that will change now.

Hawkhurst is blessed with two GP Surgeries and a Cottage hospital – there is apparently limited support for the promotion of rights of way. In addition, groups such as U3A are very active in the area but the benefits of PROW network are not promoted directly to them.

I undertake free and paid for guided tours which use PROW - the likes of me should be readily considered by KCC as partners delivering out in the parishes.

We think it would be helpful to have closer engagement with local groups e.g. cycling groups such as TWBUG; TBUG, SBUG - as well as Sustrans. KCC should co-ordinate these groups across the county.

As part of the key partners, there is not a reference to public health bodies. It is noted that local authorities are included as a key partners, as well as planning authorities. It would be helpful to clarify which department within the local authorities are the key partner in each scenario.

In the statement of actions there is no mention of the Ramblers, long distance walkers associations, the cyclist tourist club or even a generic reference 'PROW users' as key partners. Members of these organisations are the people who know what's wanted and would probably be will be first to benefit or otherwise from any change.

Equestrians are under represented among the Key Partners. The British Horse Society represents riders and carriage drivers. The Riding for the Disabled local representatives should also be consulted.

Issues reported

As an over 70 year old, it is essential that we can get access to these places easily. This means having adequate car parking at access points, or clear directions from bus stops and train stations. Better availability of maps like "The Great Stour Way" leaflet would help enormously.

Saxon Shore Way, National Cycle Network Route 1, England Coast Path all use byway NG2a/Footpath NG2 through Gravesend. Potholed, fly-tipped, littered, overgrown, blocked drains, defective lighting, highly obstructive parking by adjacent businesses every weekday. There has been some patch repair of potholes and whilst welcome it is shoddy at best. This should be an important link between Gravesend, the Thames and North Kent Marshes. It is more like a no go zone.

The only thing I would say is that the document states that Explore Kent is to be a primary communication tool for users to find PROW etc. I cycle and the only routes shown for Tonbridge when you want to use it, is the Tudor Trail. The website would really benefit from allowing users to see where they can use PROW to travel around Tonbridge, there are a number of existing cycle paths that are being joined up, but Explore Kent doesn't show any. It gives directions using roads.

Local PROW HL26 near Dennes Lane, Lydd has been barbed wired so access is impossible. Please investigate.

Tyler Hill, I can walk to the bus stop, but I cannot walk to nearby Blean with shops/doctor/more frequent buses/etc., without walking on a fairly dangerous road with double bend, which had accident just two weeks ago. Likewise access to Sustrans Canterbury- Whitstable Salt Road route is difficult without using the same road.

Although not strictly speaking a PROW, the Sandgate Maintenance Gangway has become part of the England Coast Path also KCC and Folkestone&Hythe DC have promoted cycling along this route. I agree the main road is only for experienced cyclists but a large majority of the gangway/promenade cyclists do not share the path, they dominate. Sometimes they are dangerous, especially for the elderly and young children.

Alkham byways regularly damaged by misuse of vehicle traffic, causing safety issues with pedestrians and horse riders.

Heavy traffic routes – B2017, Somerhill Schools no footway before reaching bend at Postern Lane. Solution to purchase strip of land alongside the B2017.

Lydd need better network to access villages and towns, due to heavy traffic, suggest a cycle path would make life easier and safer and could be integrated into the current pathway near Lydd golf course. A cycle path down Dungeness Road would be a fantastic asset to the area for both locals and visitors alike.

Tonbridge is a gridlock and communicating existing routes, actively building new routes through and around the town is key

All footpaths should be made into bridleways to allow for greater accessibility for everyone to enjoy the countryside. Horse riders and cyclists are becoming more vulnerable on the roads so we need to provide further off road access.

Many rural communities are car dependant and can not be safely accessed by active travel means, the situation is made worse by poor public transport. For example there is no path between Meopham and Istead rise in Gravesham with the connecting "A" road being narrow with high traffic flows.

Currently the surface of the two main byways/PROWs in the Alkham Valley area (the Bull run & Pimlico way) are both in a bad state of repair and require a lot of work before promoting to more users. Horse riders are frightened to use them in case of injury to their horses and dog walkers (the average age of such local walkers is over 65) are fearful of having a fall due to ruts and dislodged flints, caused by 4x4s etc using the byways in antisocial ways.

Delivering the plan is all very well, but you need to bring all PROWs up to an acceptable standard before you promote them to new users. Inviting new users to certain byways in

the Alkham Valley area (we are sure there will be other areas as well) is inviting some serious claims against KCC for personal and animal injury (to horses) at certain times of the year due to damaged surfaces caused by off roaders.

The strategies need to be implemented into local plans, into planning policies and, importantly, as conditions for planning applications. See EN02; RR01; ED04. Our experience is that this does not happen:

e.g. Hawkenbury Farm development plans, which are not consistent with RR01 and RR04: how does a "kiss and drop" facility sit with active travel? See AL02 and AL03; EN01, 02, 04, 05. e.g. an excellent new non-motorised facility almost links Tonbridge, Pembury and Tunbridge Wells but fails because there is no safe infrastructure into the centre of those places. e.g. non-motorised access to Pembury hospital along Blackhurst Lane: current barriers exclude use by mobility vehicle users and many cyclists. See EN 01-5. e.g. an improved cycle route along the A26, which is part of the local council's strategic cycle network and which was approved by local residents and by local councillors in open committee, was cancelled by politicians at KCC because of objections from a small number of residents.

My biggest request is for a cycle path on the coast side of the A259 from the western edge of Hythe (Reachfields in Dymchurch Road) to the Redoubt in Dymchurch. There is sufficient grass verge nearly all the way, with a minor encroachment of the Rifle Range needed in places. The completion of this would provide a cycle path (much of it on the promenade) from Folkestone Harbour all the way to Littlestone. With the new bike hire facilities just introduced along this stretch, the fitness, commute and tourism opportunities are enormous.

I would like to see off road links between established cycle paths such as the old railway routes. In particular it would be lovely to have an off road cycle route from Edenbridge to Penshurst to join the Tonbridge cycle path.

KT01. Whilst not technically PRoW the cycing network in Kent is often poorly signed. National Cycle Network Route 1 through Sittingbourne is an excellent example. Between Kemsley and Murston the route is variously on shared footways at one side of the road or in the carriageway. It is often difficult to determine which due to the paucity of signage.

In Faversham, for example, there are a number of alleyways and paths that are currently prohibited for use by cyclists but could arguably be shared between pedestrians and cyclists, encouraging children in particular to use safer means of cycling to school. But it is equally clear from social media comments that there is also a good deal of opposition from some pedestrians to shared use, although this occurs quite widely in other countries.

EN01 – The Hawkhurst NDP identified 4 green routes linking various parts of the village plus the of importance linking the various settlements to Bedgebury. This would be our top priority and we feel that the importance of Bedgebury as a hive of activity makes linking the PROW to it strategically important for Kent. KT02 – We have promoted walking locally with our own "Hawkhurst Walkfest" and are working with the High Weald and local groups on promoting walking in the area. A joined up approach would be a positive step forward.

We need to look to the future and invest in green transport. Even though Romney Marsh is flat, we have less cycle paths than other regions. We need to encourage tourism in this field.

Although the prows in Rusthall are well maintained (apart from the alleys from Grange Road which need some vegetation cut back) I feel they need to be better signposted to aid access and use.

2. The footpath network is lacking to the east and west of Westerham and would benefit from new paths.

Extension of the PROW network is highly desirable. There are several areas where new ROW or permissive paths would benefit the public, eg a footpath along the Beult from Headcorn to Yalding, and permissive public use of the footpaths that already exist along the Teise and Lesser Teise.

I would really love to see improvements to the ROWs in Sellindge incorporated into the future developments (eg. an improved footpath to Westenhanger station has been mooted in discussions re the proposed development behind Rhodes House, which would be a great start).

I would like to be advised of any new PROW projects. The reason being that some years ago I participated in the proposed extension of the path along the Royal Military Canal from Aldergate Bridge to Appledore & Ry . But clearly, and I understand , there were amongst other things financial constraints , so it seemed to die a death . I frequently get asked by Hythe residents is this ever likely to happen.

I have twice stopped and discussed with whoever happened to be around in the Brogdale Road (Faversham) development site whether they could not earn themselves some local goodwill by clearing the public pathway that now runs alongside the barred off area......promises to 'speak to the contract/site manager' but no change so far. I wondered generally whether local businesses could not 'adopt' a pathway and keep it clear as a community contribution - whilst fighting through the pathway from Faversham to Oare - which goes right round the Marks and Spencer building amongst others.

More needs to be done to allow dog walkers access. Some stiles are next to impossible especially for those with older animals. For instance the shipbourne church path past the rectory is completely impossible with a dog they are expected to jump four feet over a stile several times!

The public footpath (Footpath 90) on the north bank of the river Stour needs to be reinstated where the bank has been breached in order to provide the original access from Fordwich to Grove Ferry. Google maps shows the Stour Valley Walk on private land at Fordwich and not the true route, KCC needs to contact Google Maps to correct this and improve signage in Fordwich.

We need more bridleways, especially in the Ashford/Brabourne area.

I found the Saxon Shore Way and the Stour Valley Way were impassable to use as a circular walk from Richborough recently. Further many footways are not signed or kept clear by farmers. However deletion of certain prows is sensible when redundant and there are better alternatives.

Sevenoaks District Council, working with Kent Wildlife Trust and other local partners, has received a confirmed National Lottery grant of £483,600 for the Sevenoaks Greensand Commons heritage project. This will be a four year project covering the 300ha of Commons that largely fall under SDC's management and will include Seal Chart, Fawke Common and Bitchet Common in Seal Parish and Crockenhill, Hosey Common and Farley Common in Westerham Town. Including match funding and volunteer time the project will have a value of £685,274 and aims to restore the landscape, social and natural heritage of the Commons, improve footpaths, bridleways and signage. There will be opportunities for people to find out and share more about the history and wildlife of the Commons and to take a lead role in the on-going management of their conservation and promotion of their heritage.

We see this as an opportunity to significantly improve a number of existing PROWs in terms of adjacent vegetation clearance to complement KCC's statutory responsibility for surfacing, possibly create some permissive paths, and to improve the connectivity to the Commons via PROWs. This has been identified as a priority by local people following extensive consultation during the Development stage of the bid to the HLF.

This project offers unique opportunities to use volunteers working with the support of the landowners to both identify improvements but also to support work needed to bring the PROWs up to a standard that can be enjoyed by many people. We welcomed the support of KCC footpaths officer during the Development stage who committed to providing in kind and real resources to support a successful bid and this consultation offers us an opportunity to flag up some of the very real benefits that could result from working in partnership with KCC over the coming 4 years.

How this meets Objectives of KCC's Plan

Ref code AL01, 02 and 03

With the input of volunteers, and alongside one of our project partners, we have identified some desirable improvements in the Seal area. In particular there is a strong desire to improve connectivity between paths and bridleways to give better access the Commons by foot, horse or cycle, and to link them with nearby National Trust properties such as Knole and the local communities. We have examples of gaps in the network:

- On Seal Chart the A25 is a dangerous barrier to horse-riders, cyclists and walkers. A
 safer crossing is needed between Seal Chart and Oldbury Hill, linking well used
 leisure routes and the settlements either side of the road. This might be located at
 the Pillar Box Lane /Church Lane cross roads, or at Coldhanger where bridleway 112
 meets the A25 and there is a permissive path to lane C326.
- A cycleway could be created from Seal to Seal St Laurence school using the
 pavement on the north side of the A25 from Seal to a crossing point at Church Lane,
 and a path created on the Common along Church Lane.

Several bridleways end at dangerous points on roads with no safe return route. We suggest the following improvements:

- Upgrade footpath 115 to a bridleway to form a circular route between Seal Chart and Godden Green, using path 115 and bridleway 129.
- Upgrade path 160 to a bridleway from Back Lane, Godden Green to Fawke Common.
- Link Hosey and Crockhamhill Commons which are separated by a dangerous road, by clearing a grass verge and using National Trust land.

We anticipate that there will be other improvements on/between the project sites that will emerge and develop over the 4 year Sevenoaks Greensand Commons lifetime.

Less work has been done in the Westerham area, however local residents have already identified to us that there is an obvious link to create between Hosey and Crockhamhill Commons, currently separated by a very dangerous road. It has been suggested this might be possible, by clearing a grass verge and using some NT land, but further work needs to be done to investigate this further and we would welcome approaching this in a collaborative manner with Kent County Council.

In summary, we look forward to working with you to ensure the full benefits of the project are delivered and PROWs are improved significantly with the additional support from volunteers and funding for work beyond the statutory duties of Kent County Council.

Our comments are on behalf of a community bisected by the congested and hazardous A25. It is part rural with an exceptional landscape and popular walking routes, and part urban with relentless pressure on unsuitable minor roads from cars and heavy vehicles.

There is inadequate provision for safe walking and cycling within the community and to three expanding schools, two new care homes and possible major new housing nearby. Our priority is to improve the connectivity of walking and cycling routes to schools, rail stations etc., and for exploration of the countryside.

Safe routes to schools

Seal Primary school has a wide catchment that includes Kemsing, a kilometre to the north on Childsbridge Lane. A footpath at Copse Bank also leads directly to secondary schools less than a kilometre away. All the schools are expanding, but despite desperate parking problems no one walks or cycles this route because it crosses a road bridge with no pavement. We are at an impasse in our efforts to install a pavement and traffic management at the bridge, and seek help to improve the path at Copse Bank.

Effective cycle routes

The Sevenoaks Cycle Strategy includes many potential cycle routes, but nothing has been done to provide clear and where possible segregated routes where they are most needed. The priorities should be:

- an east/west alternative to the A25, linking housing, schools and rail stations in north Sevenoaks, intersecting with:
- a north/south route between the town centre, housing, schools and the rail station.

We continue to impress upon the local authorities the importance of an alternative to the car, especially when major new development is taking place and two new multi-storey car parks are being built.

Rural connections

The Heritage Lottery Fund has awarded a significant grant for the 'Sevenoaks Greensand Commons' project, to conserve and improve over 300ha of common land along the Greensand Way, from Hosey Common to Seal Chart.

Consultation for the project found a strong desire to improve connectivity between paths and bridleways to give better access the Commons by foot, horse or cycle, and to link them with nearby National Trust properties such as Knole and the local communities. We have examples of gaps in the network:

- On Seal Chart the A25 is a dangerous barrier to horse-riders, cyclists and walkers. A
 safer crossing is needed between Seal Chart and Oldbury Hill, linking well used
 leisure routes and the settlements either side of the road. This might be located at
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- link Hosey and Crockhamhill Commons which are separated by a dangerous road, by clearing a grass verge and using National Trust land.

The Sevenoaks Greensand Commons project will enable limited improvement of walking and cycle routes, and measure to create 'safe lanes.' The Parish Council will support the project and welcomes engagement with the PROW unit to address its priorities in Seal.

3 Knowing what's out there

Objective KT01 – Information on the footpath network is widely available and the Parish Council values the on-line 'fault reporting' tool. It would be helpful if the definitive footpath map were available on-line in its own right, and not only as part of that tool.

4 Well-maintained network

• MN01 Better Network for Leisure and Daily Use – We strongly support this objective and the measures proposed, especially work with Parish Councils to Identify local priorities.

We are concerned that local roads which are popular cycle routes are unsafe, particularly because of erosion at the edge from poor drainage and heavy vehicles. We would welcome better coordination of drainage and surface maintenance on key routes.

Some paths and bridleways become unusable at times because of deep mud and water; for example, bridleway 107 needs scraping to provide a better link between Seal Chart and Oldbury.

5 Rights with responsibilities

PR01 Provide advice on PROW Network – We support this objective and the measures
proposed, especially the need to work with developers, land owners and Local Planning
Authorities in the planning process. We believe that more than advice is required. A
lead needs to be taken to promote at least one traffic free walking and cycling route in
every town, and these should be given priority for funding.

6 Efficient delivery

• ED05 Working in Partnership – We support this objective and draw your attention to the Sevenoaks Greensand Commons project as an opportunity to work with the Parish Councils to identify and remedy local priorities for network improvements.

Q9. Do you have any other comments on the ROWIP?

Your research found that less than 10% use PROW to take children to school or get to work (page 14). We believe this underlines the need for greater connectivity in the network.

You illustrate the use of spatial data to target schools and potential links to the PROW network, encouraging active travel and healthy lifestyle choices (page 28). We support this aim, and in our experience more coordination and commitment is needed by all those involved to make walking and cycling routes safe, including provision of a pavement where none is present, better road crossings, and lower speed limits.

We note your emphasis on working with local authorities and developers to identify the infrastructure needed to accommodate future growth by encouraging more sustainable travel (pages 13 and 23). Development of 600 dwellings has been proposed nearby at Sevenoaks Quarry, and we believe this will not be practical unless proper provision is made for walking and cycling.

The Parish Council hopes that the PROW Unit will be vigilant of the proposals for this site, and work with us to ensure that the Local Plan and a design brief require well connected walking and cycling routes, supported by developer funding.

Some paths and bridleways become unusable at times because of deep mud and water; for example, bridleway 107 needs scraping to provide a better link between Seal Chart and Oldbury.

I would like to be sure that there is consideration to the link between our village of Appledore and Appledore Station, which is located just over a mile from the actual village, (The Street).

The Friends of Appledore Station, which has been established to 'Improve the Image of Appledore Station by Providing a More Attractive, User Friendly Facility and thereby Encourage an Increase in the Usage of the Marshlink Rail Service'. Passengers and Villagers have consistently expressed the view that a suitable pathway between the Village and Appledore Station, for Pedestrians and Cyclists is highly desirable, moreso in view of the very limited parking facilities at Appledore Station.

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KENT COUNTY COUNCIL EQUALITY IMPACT ASSESSMENT

Please read the EqIA GUIDANCE and the EqIA flow chart available on KNet.

Directorate: GET

Name of policy, procedure, project or service

Rights of Way Improvement Plan Review

What is being assessed?

Rights of Way Improvement Plan (ROWIP)

Responsible Owner/ Senior Officer

Denise Roffey

Date of Initial Screening

18.2.13

Update each revised version below and in the saved document name.

Version	Author	Date	Comment
1	Colin Finch	18.2.13	Previous EQIA
2	Denise Roffey	18.08.17	Initial submission
3	Denise Roffey	22.2.18	Update
4	Denise Roffey	25.5.18	Update
5	Denise Roffey	18.6.18	Update
6	Denise Roffey	31.10.18	Update following public consultation 20th June – 12th September 2018

Screening Grid

Public Consultation (20th June – 12th September 2018) During the public consultation the ROWIP was available as a detailed document and in an Easy Read format. Both of these were available online, and paper copies were available to read at all libraries in Kent. We also provided a questionnaire to facilitate feedback on the ROWIP in different formats which included the following:

- Online version to complete and submit electronically.
- Online version printed and completed as a paper copy.
- All libraries received paper copies of the detailed and Easy Read versions of the ROWIP and paper copy questionnaires were available to the public.
- We also provided the option to send a paper copy of the detailed or Easy Read version of the ROWIP and questionnaire through the post.

The esponse from the public consultation was high with a total of 2476 downloads of the document itself and a total of 362 questionnaires were completed and submitted or sent back.

As part of the questionnaire we provided the public with an option to complete information about themselves. We asked if the ROWIP was easy to read and provided a copy of the EQIA completed on 18.06.18, and asked an open ended question for feedback on this document. 309 respondents said that the ROWIP was easy to read and overall the feedback on the EQIA was positive and 12% of the respondents said that they agreed with the EQIA, that is was thorough/complied and covered all aspects.

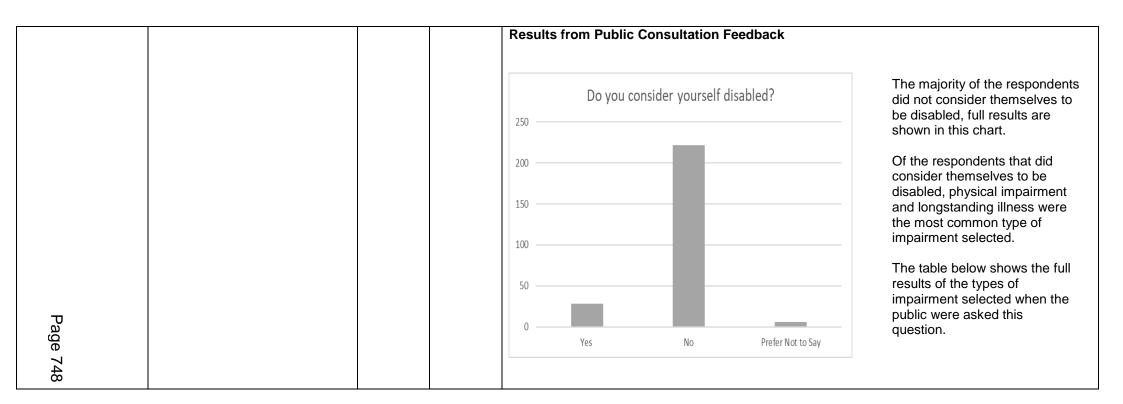
Please see results from the public consultation in the table columns titled 'Results from Public Consultation Feedback' below.

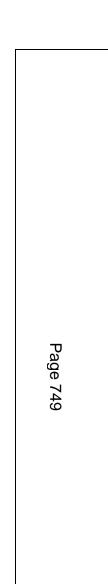
Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why? Internal action must be included in Action Plan	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities	
	If yes how?	Positive	Negative	internal action must be included in Action Plan	If yes you must provide detail	
Age Page 744	No	Medium	None	The Public Rights of Way (PROW) network is used by a variety of age groups which vary from parents with children and babies to elderly walking groups. Under-represented groups that are less likely to visit the countryside, are the younger and older age range groups. MENE research shows that those aged between 19 and 25 and those over the age of 65 were least likely to have visited the outdoors in the previous 7 days. The results from the market research completed in 2017 showed that the 16 – 24 age group was underrepresented, especially in the online group with only 1% of the respondents but also in the Kent resident group with only 9%. The 25 – 34 and the 75 + age groups were also underrepresented in the online group with only 7% and 5% of the respondents respectively. Overall most of the respondents were between the ages of 45 – 64 years of age. To encourage these under-represented groups to visit the countryside and use the PROW network we must address the barriers preventing use. Market research results showed that in the Kent resident non-user group the younger age groups were not interested in using the PROW network or take alternative means of transport. The results also showed that a lack of information acted as more of a barrier for the younger age groups. This was consistent with the results from the question 'What would encourage use?' where a significantly higher proportion of 16 – 34 years old users in the Kent	Yes. In order to break down barriers for the underrepresented age groups we need let people know what is available to them through better promotion and sharing of information. More accessible information and increasing knowledge & confidence has been identified as a need from the analysis of our market research, which includes young and older age groups to encourage use. Policy promotes provision of accessible routes to encourage Active Travel, and facilitate access to green space, to provide physical and mental health and well-being benefits for all age groups. Policy also sets specific objectives to remove age related barriers to improve accessibility and increase use of the PROW network in the following ways: • No authorisation of new stiles on the network, work with landowners to remove stiles and ensure least restrictive access. • Improve maintenance of network, further improve vegetation clearance, fingerpost and way marking maintenance.	

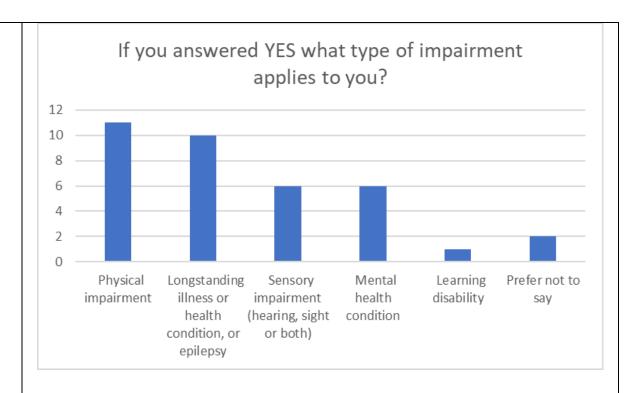
Page 745	resident group answered 'information'. The way that people access information varies between age groups, although it will depend on the individual's preference, market research results showed that a significantly higher proportion of the younger age groups 16 – 44 used the phone appeared the older age groups 55 + used maps and guides. Results from the market research showed that whole looking at age sub groups for the PROW user groups, a higher percentage of those aged 55 + in the Kent resident group found poor maintenance stiles/gates and surface, overgrown vegetation are difficult terrain the biggest barriers.	use, looking at specific groups including young and old age groups. Consider all types of information including online, phone apps, maps and guides in order to reach different age groups. We will also look to gateways to
	Results from Public Consultation Feedback Results from the public consultation showed that questionnaire were between 35 – 74 years of age age group. Results from all respondents are show	, with the most respondents being in the 65 – 74

Page 746				Which age group applies to you? Which age group applies to you? O-15 16-24 25-34 35-49 50-59 60-64 65-74 75-84 85+ Prefer not to say We received a number of responses to the open-ended question about this EQIA which related to age, the main comments included the following: Not everyone uses a computer and older people still want paper maps and leaflets. Consideration needs to be given to the fact that Kent has an ageing population. Improved disabled access also provides better access for the older age groups. Need to work with schools to get younger age groups interested in the PROW network.
Disability	No	High	None	Results for the Market Research completed in 2017 showed that indicated they had a disability were far less confident in their knowledge of PROW. Stiles act as a barrier to people with mobility issues limiting the network available to them and preventing access to certain areas. Results from the market research showed that other barriers to use included Yes. Policy promotes provision of most accessible 'routes for all' where possible to do so, to encourage Active Travel, and facilitate access to green space, to provide physical and mental health and well-being benefits to all users. Policy promotes provision of most accessible 'routes for all' where possible to do so, to encourage Active Travel, and facilitate access to green space, to provide physical and mental health and well-being benefits to all users.

	overgrown and poorly maintained paths.	undertaken and sets out a series of objectives to resolve issues identified.
	The results also showed that there is a correlation	
	between increased use of the PROW Network a	
	access to information.	ROWIP to remove barriers and increase
		the accessibility of the PROW network and
		ensure accompanying material is
		accessible to all in the following ways:
		 Improve accessibility through
		maintenance of network, further
		improve vegetation clearance and
		work with landowners to remove stiles and ensure least restrictive
		access.
		access.
		 Using data from market research,
		look at different ways PROW
		information can be tailored to
Page		reach our customers, looking at
) De		specific disabled and visually
Φ 7		impaired user groups.
747		
		Keep communication open with
		specialist user groups. Provide
		updates of specific improved
		routes to user groups.







We received a number of responses to the open-ended question about this EQIA which related specifically to disability. The most common response was the need to make routes accessible for more types of user. Suggestions included:

- More disabled access gates.
- · Removal of stiles.
- Better access points, including dropped kerbs.
- · Better surfaced routes.
- Wheelchair friendly routes.

There were concerns over the safety of routes for more vulnerable users, which included speed of traffic, conflict of users and dogs on routes.

Other comments related to how the Service provides information and there were suggestions of audio aids, non-written information to suit low level literacy and the need for more accessible

				information in general.		
Gender Page 750	No	Low	None	Results from the Market Research showed that male 'users' and 'users' aged 55 and over were more confident when compared with female respondents.	Yes. Policy includes a summary of research undertaken and sets out objectives to resolve issues identified. Objectives have been set within the ROWIP to remove barriers and increase the accessibility of the PROW network and to ensure that accompanying material is accessible to all. The results showed that there is a correlation between increased use of PROW the network and access to information. Using data from market research, we will look at different ways PROW information can be tailored to reach our customers to encourage use, looking at gender specific groups.	
Gender identity	No	None	None	Results from Public Consultation Feedback Results from the public consultation showed that there female respondents with 46% women, 52% men and 2 The were no comments from the open-ended question gender.	2% preferring not to say.	
Race	No	Low	None	Black, Asian and Minority Ethnic (BAME) Groups In Kent there is higher proportion of Kent's ethnic population living in urban Dartford and Gravesend. Living in these areas alone will make access the countryside due to the cost, time and transport	Yes. The PROW and Access service will aim to make information more accessible and increase knowledge & confidence for BAME groups and ensure promotional material will be appropriately targeted to	

Updated 02/11/2018

issues less likely and MENE research has shown BAME groups and provided in alternative that BAME populations which do visit the outdoors formats and languages as necessary. are more likely to visit urban locations and places closer to home. Policy sets an objective to establish better promotion of the service to BAME groups Results for the Market Research completed in 2017 that are currently "under-engaged" in showed the following when comparing white and access to the countryside. BAME groups who responded to the guestionnaire. BAME more males responded than females. Significantly more younger age groups in the BAME groups form 16 - 44 responded (70% compared to 36%), whereas in the white groups more, older 55-75+ responded (46% compared to 8%). A slightly higher percentage of the BAME group visited urban areas and slightly less visited woodland and nature reserves. Page 751 A higher percentage of white groups would visit further afield from areas of open space they visit, compared to BAME groups. There was a slightly higher percentage of the BME respondents that would go further afield if they knew where the route led. Therefore, lack of information acted more of a barrier to BAME groups. There were less respondents in the BAME groups that were confident in their knowledge of PROW with almost half of the BAME having no knowledge at all compared to the white group (48% and 19% respectively). There was less confidence in knowledge of PROW near their homes, with 32% of respondents of the BAME groups having no knowledge at all, but higher percentage of this groups had enough knowledge for their needs.

There was a higher percentage of respondents that were not confident where to find information and almost half of the BAME group (46%) had no knowledge at all. There were a higher percentage of the BAME group that had little or no knowledge of what they were allowed to do on a PROW with over half (52%) having no knowledge at all. This was also the same for knowledge of the countryside code, map reading and using a PROW without a map, with 46% and 48%, 46% respectively, having no knowledge at all. How both groups wanted to find out information about PROW was very similar, with website and emails being top answers. The library, word of mouth, tourist information centre and twitter were not preferred options to find out information about Page 752 PROW for the BAME group. Other barriers may include cultural differences, as some communities may not have the cultural habit of going to the countryside and may not be aware of opportunities available to them, or may simply lack interest or confidence. Overcoming barriers is key to encouraging use for these underrepresented groups. The Defra report 'Outdoors for All?' suggests various actions that local authorities could take, which include making sure promotional material is available in a range of formats and languages, avoiding stereotypes, working in partnership with a range of organisations and establish community outreach organisations extending staff and volunteer awareness and diversifying volunteer profile.

¹ Outdoors for All? Department for Environment, Food and Rural Affairs (2008)

				Results from Public Consultation Feedback		
				belong?	Results from the public consultation showed that the large majority of respondents were White English as shown in the chart.	
Page 753				100 50 White White White White Irish White Mixed Black or English Scottish Welsh Other* Other Black British	chart. There were no comments made regarding race specifically, although comments were made about providing information about the PROW network and promoted routes in different languages to cater for foreign tourists.	
Religion or belief	No	None	None			
Sexual orientation	No	None	None			
Pregnancy and maternity	No	Medium	None	accessible rout to encourage o families. Policy to improve the network, assoc supports school the availability of	Yes. Policy promotes provision of accessible routes and provision of facilities to encourage outdoor recreation for families. Policy also sets specific objective to improve the accessibility of the access network, associated information and supports school transport strategies and the availability of local accessible green space.	
Marriage and Civil Partnerships	No	None	None	space.		

Carer's responsibilities	No	Medium	None		Yes. Policy sets out a series of objectives to improve access to outdoor recreation and information about opportunities for outdoor recreation. Therefore providing carers and their dependants with greater opportunity for and access to active, outdoor recreation. Where possible information will include details of rest stops and toilet facilities.
Page 754				Are you a Carer? 250 200 150 100 Yes No Prefer Not to Say	Results from the public consultation showed that a low number of respondents were carers as shown in this chart. There were no comments made regarding carers specifically, although comments were made about providing information on the location of toilet facilities and resting points (picnic tables and benches) and where they were available on or near the PROW network.

Part 1: INITIAL SCREENING

Proportionality - Based on the answers in the above screening grid what weighting would you ascribe to this function

Low	Medium	High
Low relevance or	Medium relevance or	High relevance to
Insufficient	Insufficient	equality, /likely to have
information/evidence to	information/evidence to	adverse impact on
make a judgement.	make a Judgement.	protected groups

State rating & reasons

Medium relevance Impact likely to be positive, market research is currently taking place and further information will be available for analysis. Analysis will help define objectives which will further influence our screening grid and help produce positive impacts.

Following completion of Market Research the ROWIP will have a Medium Positive Impact.

Context

Following the Countryside & Rights of Way Act 2000, a duty was placed on Kent County Council to produce a Rights of Way Improvement Plan and to update this plan every 10 years. The purpose of the Plan is to:

- Increase the usage and enjoyment of Kent's public rights of way and open green space;
- Support Kent's regeneration by delivering improvements which will contribute to a better environment
- Provide opportunities to improve health and wellbeing.
- Provide a gateway to explore Kent's heritage, wildlife and iconic landscapes,
- Improve the quality of life for residents and visitors of Kent.

The Public Rights of Way (PROW) and Access Service is reviewing its plan and carrying out market research to ascertain the current use of the rights of way network and how it needs to evolve over the next 10 years to meet the needs of Kent's residents and visitors.

Aims and Objectives

We need to answer three key questions

- 1. What is the extent to which local rights of way meet the present and likely future needs of the public?
- 2. What are the opportunities provided by local rights of way for exercise and other forms of open-air recreation and the enjoyment of the authority's area?
- 3. What is the accessibility of local rights of way to blind or partially sighted persons and others with mobility problems?

In responding to the questions we must consider the following:

- access to the countryside or a particular viewpoint, feature or attraction
- access to woodland as well as other land types and to improve provision for cyclists, horse riders and disabled users
- routes to support tourism, regeneration or community projects
- alternative routes for cyclists, horse riders and walkers to avoid using busy roads
- circular routes for leisure use, e.g. walking, running, cycling
- paths and routes by water or the sea which need repairing
- crossings over roads, railways, rivers and canals
- existing rights of way, e.g. those that end in cul-de-sacs or that have different rights along their length
- routes for local journeys, e.g. walking to work, the shops, railway stations
- routes to help people travel through or around heavily developed areas

Kent County Council's Public Rights of Way and Access Service is reviewing its Rights of Way Improvement Plan which will be consulted on in 2018.

The policy sets out a strategy to improve Public Rights of Way and wider access to open space for the next 10 years. The document supports a number of internal and external strategies relating to Health, Sustainable Transport, Development sites, Rural Economies and Recreational Tourism. All relevant policy links will be identified in the main document.

Policy will also address the current financial reductions to the Services budget and sets a prioritisation for maintenance.

Beneficiaries

Residents and visitors to Kent.

Consultation and data

The Plan itself will be thoroughly researched using a combination of the following.

- Literature Review
- Market Research / Stakeholder Survey/Focus Groups
- MOSAIC profiling of the Services customers.
- Fragmentation Analysis

Statute determines that the Plan also researches the use and demands of specific community groups including, Walkers, Cyclists, Equestrians, disability and BME. We will be using the analysis of the research undertaken to set out specific objectives to make positive changes for the customer.

The Draft Plan will be made publically available in multiple formats; online, and hard copies retained at the PROW and Access Service offices for viewing.

The consultation will be directly sent to previously identified interested parties. The consultation will be communicated online, via social media and local newspapers.

Potential Impact as identified (please see screening grid above)

Age - Medium

Disability - High

Gender and Race - Low

Adverse Impact: None

Positive Impact:

Overall, delivery of the Plan would result in a high positive impact for all characteristics. Through the initial market research completed in 2017 and the proposed "Draft" for consultation, as many customers as possible will have opportunities to input into this customer facing Plan.

JUDGEMENT

Option 1 – Screening Sufficient NO No. As the Draft version of the Plan will undertake a full public consultation a Full Impact Assessment will be undertaken. Justification: In depth research is currently being undertaken and will be evidenced within the Draft Plan. Option 2 – Internal Action Required YES/NO **Option 3 – Full Impact Assessment** YES Yes. As the Draft version of the Plan will undertake a full public consultation a Full Impact Assessment will be undertaken. **Equality and Diversity Team Comments** Sign Off Senior Officer graham g Signed: Name: GRAHAM RUSLING Job Title: Head of Public Rights of Way and Access Date: 19 June 2018 **DMT Member**

Signed:

Job Title:

Name:

Date:

Part 2: FULL IMPACT ASSESSMENT

Name

Rights of Way Improvement Plan

Responsible Owner/ Senior Officer:

Denise Roffey / Graham Rusling

Date of Full Equality Impact Assessment:

Scope of the Assessment

Set out what the assessment is going to focus on, as directed by the findings from your initial screening

Information and Data

State what information/data/research you have used to help you carry out your assessment

Involvement and Engagement

Provide details of all the involvement and engagement activity you have undertaken in carrying out this assessment and summarise the main findings

Judgement

Set out below the implications you have found from your assessment for the relevant diversity groups. If any negative impacts can be justified please clearly explain why.

Action Plan

Provide details of how you are going to deal with the issues raised in judgement above and complete the Action plan at the end of this document

Monitoring and Review

Provide details of how you intend to monitor and review progress against the above actions

Equality and Diversity Team Comments

The Equality and Diversity Team to make any comments following their review.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer	
Signed:	Name:
Job Title:	Date:
DMT Member	
Signed:	Name:
Job Title:	Date:





Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications

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From: Mike Whiting, Cabinet Member for Planning, Highways, Transport and

Waste

Barbara Cooper, Corporate Director of Growth, Environment and

Transport

To: Environment and Transport Cabinet Committee – 28th November 2018

Subject: Bus Summit – Big Conversation Update

Classification: Unrestricted

Past Pathway of Paper: N/A

Future Pathway of Paper: N/A

Summary:

This report details the Bus Summit event where five pilots were announced and outlines the next steps for delivering each of the pilots.

Recommendation

The Cabinet Committee is asked to note the report.

1. Introduction

- 1.1 In June 2018 the Authority launched the 'Big Conversation' consultation to explore options for delivering better, more sustainable transport to rural communities not currently served by commercial operators.
- 1.2 The Big Conversation consultation ran for eight weeks until the 8 August 2018. The Authority received 2,335 responses to the consultation questionnaire. Lake Market Research was commissioned to analyse and report upon the responses to the consultation which has been incorporated into the development of pilot proposals.
- 1.3 The inaugural Bus Summit took place in the Council Chamber on the evening of the 30 October 2018. Over 100 individuals were invited from a range of stakeholder groups.

2. The Bus Summit

2.1 Between sixty and seventy individuals representing a range of stakeholder groups as well as 18 members attended the event. The summit was also web casted to ensure those unable to attend could view the event at a time that suited them. This is viewable for up to 12 months and can be accessed at https://kent.public-i.tv/core/portal/webcast interactive/382871

2.2 The panel comprised:

- Mike Whiting (Cabinet Member for Planning, Highways, Transport and Waste)
- Paul Carter (Leader of the Council)
- Phil Lightowler (Head of Public Transport)
- Robert Clark (Programme Manager)
- Stephen Pay (Planning and Operations Manager)
- Jo Simpson (Lake Market Research)
- 2.3 The summit was opened by the Cabinet Member for Planning, Highways, Transport and Waste (Chairman) and included a panel introduction and explanation of the topic areas that were to be presented.
- 2.4 Feedback on the summary of the consultation findings was presented by Lake Market Research. The formal report was subsequently published on www.kent.gov.uk/bigconversation after the event.
- 2.5 Robert Clark, KCC Programme Manager, then gave a summary of how the pilots were developed and evaluated following the public consultation.
- 2.6 The Chairman announced the pilots that will be implemented subject to further development and formal approval by whom? The five pilots were as follows:
 - Dover Feeder Bus
 - Maidstone Feeder Bus
 - Sevenoaks Taxi Bus
 - Tenterden Taxi Bus
 - West Malling Feeder Bus
- 2.7 There was also a detailed summary of the next steps for the programme which included how and when the pilots will be implemented. There was then a Question and Answer session for attendees to ask questions to panel members about the topics discussed at the summit before the Cabinet Member for Planning, Highways, Transport and Waste closed the summit at 20:00.

3. Pilots

- 3.1 The following pilots have been provisionally approved:
 - Dover Feeder Bus
 - Maidstone Feeder Bus

- Sevenoaks Taxi Bus
- Tenterden Taxi Bus
- West Malling Feeder Bus
- 3.2 These pilots demonstrated the following:
 - Received a good response in the consultation which included support from the local Parish Councils
 - Demonstrated greater service improvement through increased opportunity for residents to access public transport
 - The local areas had a large number of residents and were not close to their nearest town
 - Demonstrated a positive impact through additional journey frequencies
 - They could be delivered by June 2019 and potentially brought forward to an April commencement date if a Brexit deal has been achieved.
- 3.3 All pilots are subject to formal approval and will be presented through the appropriate governance structure. Full business cases including commissioning processes will be developed throughout 2018.

4. Next Steps

Pilot Development

- 4.1 Between November and January, the Programme team will develop and finalise the pilot proposals which will require extensive engagement and planning of the services. This will include the following:
 - Facilitate working groups which include local county members, town/parish councils and local community groups
 - Explore commissioning opportunities with the local market
 - Finalise pilot routes, connecting services and costings
 - Submit business cases for approval

Pilot Approval and Mobilisation

- 4.2 Prior to pilots commencing, the Programme team will seek pilot approval in January 2019. Should the individual pilots be approved, they will be required to be commissioned, promoted and monitored. This will include the following:
 - Commission the individual services
 - Build the required infrastructure to support the pilots
 - Promote the schemes in the local area 'Use it or Lose it'
 - Monitor passenger numbers and conduct regular service reviews
 - Evaluate pilot sustainability after 12 months

Review the subsidised bus service expenditure and evaluate potential improvements

Timescales

- 4.3 The timescales are as follows:
 - Pilot Development November 2018 January 2019
 - Pilot Approval January 2019
 - Pilot Mobilisation February May 2019
 - Pilot Commencement 1 June 2019
 - Pilot Review 1 June 2019 31 May 2020

5. Recommendation

5.1 The Cabinet Committee is asked to note the report.

6. Appendices

Appendix A – Pilot Summaries

7. Contact details

Report Authors:

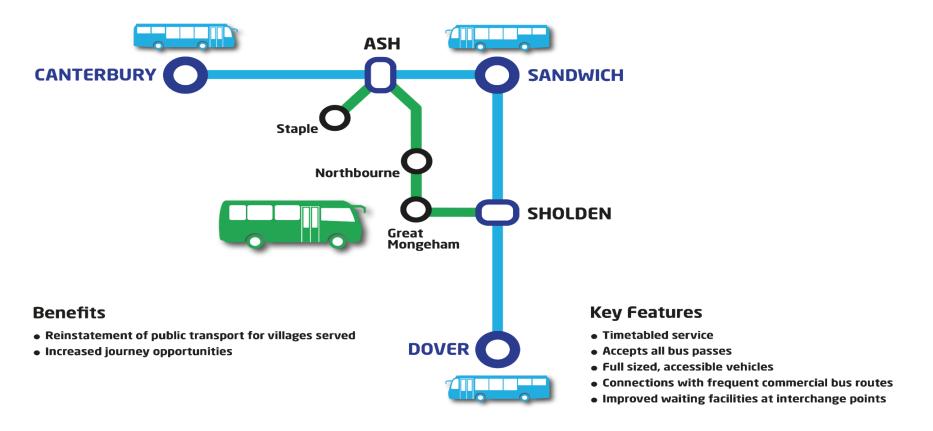
 Robert Clark – Commissioning Programme Manager <u>Robert.Clark@kent.gov.uk</u> – ext. 415951

Relevant Director:

 Simon Jones – Director of Highways, Transportation and Waste Simon.Jones @kent.gov.uk – ext. 411683

DOVER Feeder Bus Service

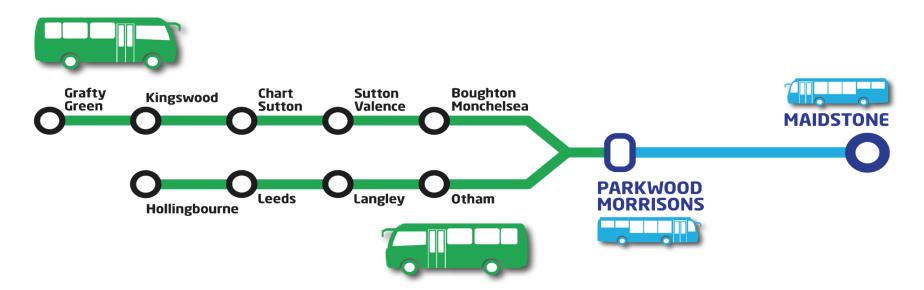
New service for Northbourne, Staple and Mongeham re-establishing links with the commercial bus network





MAIDSTONE Feeder Bus Service

New feeder services linking rural villages in the east of Maidstone with regular bus services to Maidstone and Tenterden



Benefits

- Significantly improved frequencies for villages served
- Increased journey opportunities
- Modification of existing services improves sustainability
- New links to Tenterden

- Timetabled service
- Accepts all bus passes
- Full sized, accessible vehicles
- Connections with frequent commercial bus routes
- Improved waiting facilities at interchange points



SEVENOAKS Taxi-bus Service

New Taxi Bus service for Fairseat, Stansted, West Kingsdown and East Hill



Benefits

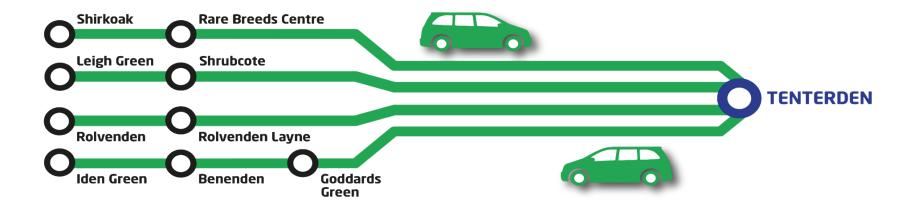
- New and improved links to Sevenoaks for outlying area
- Daily service for all areas linking to the local town

- Timetabled service
- Accepts all bus passes
- Accessible vehicles



TENTERDEN Taxi-bus Service

New Taxi Bus network for the Tenterden area



Benefits

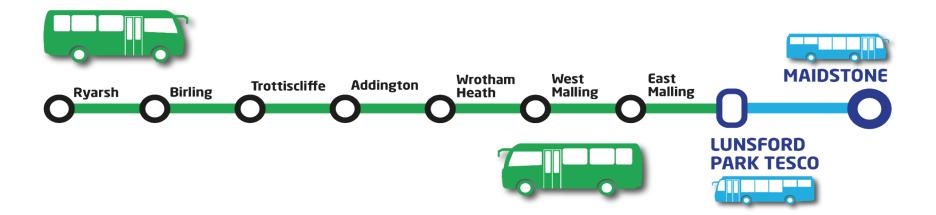
- New and improved links to Tenterden for outlying area
- Daily service for all areas linking to the local town

- Timetabled service
- Accepts all bus passes
- Accessible vehicles



WEST MALLING Feeder Bus Service

Feeder service linking outlying area with West Malling and Lunsford Park, Tesco's for onward journey to Maidstone



Benefits

- Improved frequencies for villages served
- Increased journey opportunities
- New link to Lunsford Park Tesco
- Builds upon existing service improving sustainability
- Enables use of developer funding

- Timetabled service
- Accepts all bus passes
- Full sized, accessible vehicles
- Connections with frequent commercial bus route
- Improved waiting facilities at interchange points



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From: Benjamin Watts, General Counsel

To: Environment and Transport Cabinet Committee on 28th November

2018

Subject: Work Programme 2019 -2020

Classification: Unrestricted

Past and Future Pathway of Paper: Standard agenda item

Summary: This report gives details of the proposed work programme for the Environment and Transport Cabinet Committee.

Recommendation: The Environment and Transport Cabinet Committee is asked to consider and agree its Work Programme for 2018-2019.

1. Introduction

- 1.1 The proposed Work Programme, appended to the report, has been compiled from items in the Future Executive Decision List and from actions identified during the meetings and at agenda setting meetings, in accordance with the Constitution.
- 1.2 Whilst the Chairman, in consultation with the Cabinet Members, is responsible for the programme's fine tuning, this item gives all Members of this Cabinet Committee the opportunity to suggest amendments and additional agenda items where appropriate.

2. Work Programme 2018/19

- 2.1 The proposed Work Programme has been compiled from items in the Future Executive Decision List and from actions arising and from topics, within the remit of the functions of this Cabinet Committee, identified at the agenda setting meetings [Agenda setting meetings are held 6 weeks before a Cabinet Committee meeting, in accordance with the Constitution].
- 2.2 The Cabinet Committee is requested to consider and note the items within the proposed Work Programme, set out in appendix A to this report, and to suggest any additional topics to be considered at future meetings, where appropriate.
- 2.3 The schedule of commissioning activity which falls within the remit of this Cabinet Committee will be included in the Work Programme and considered at future agenda setting meetings to support more effective forward agenda planning and allow Members to have oversight of significant services delivery decisions in advance.
- 2.4 When selecting future items, the Cabinet Committee should give consideration to the contents of performance monitoring reports. Any 'for information' items

- will be sent to Members of the Cabinet Committee separately to the agenda and will not be discussed at the Cabinet Committee meetings.
- 2.5 In addition to the formal work programme, the Cabinet Member for Economic Development, the Chairman of the Cabinet Committee and other interested Members are intending to visit all district councils over the next two years starting with Dover, Dartford, Swale and Thanet.

3. Conclusion

- 3.1 It is vital for the Cabinet Committee process that the Committee takes ownership of its work programme to deliver informed and considered decisions. A regular report will be submitted to each meeting of the Cabinet Committee to give updates of requested topics and to seek suggestions for future items to be considered. This does not preclude Members making requests to the Chairman or the Democratic Services Officer between meetings, for consideration.
- **5. Recommendation:** The Environment and Transport Cabinet Committee is asked to consider and agree its Work Programme for 2018.
- 6. Background Documents: None
- 7. Contact details

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Lead Officer: Benjamin Watts General Counsel 03000 410466

benjamin.watts@kent.gov.uk

Environment and Transport Cabinet Committee - WORK PROGRAMME 2018 Updated – 29.10.2018

Item	Cabinet Committee to receive item
Portfolio Dashboard	At each meeting
Budget Consultation	Annually (November/December)
Final Draft Budget	Annually (January)
Annual Equality and Diversity Report	Annually (September)
Risk Register – Strategic Risk Register	Annually (March)
Winter Service Policy	Annually (September)
Directorate Business Plan	Annually (March)
Work Programme	At each meeting

	Thursday 17 January 2018					
No.	Item	Key Decision	Date added to WP	Additional Comments		
1 🔻	Intro/ Web announcement (Standing Item)					
2 8	Apologies and Subs (Standing Item)					
3 0	Declaration of Interest (Standing Item)					
4 75	Minutes (Standing Item)					
5	Verbal Update (Standing Item)					
	17/00084 – A247 Sutton Road, Maidstone at its junction with Willington street			Deferred from Nov to Jan		
	18/00037 - M2 Junction 5	Yes		Deferred from July to Sept Deferred from Sept to Nov Deferred from Nov to Jan		
	17/00135 - Pitch Allocation Policy for Gypsy and Traveller Service Charge	Yes	16/01/2018	Deferred from Jan to March Deferred from March to May Deferred from May to July Deferred from July to September Deferred from Sept to November Deferred from November to January		
	Kent County Council's Approach to Understanding Organised Crime Group management - Position Statement		16/02/2018	Deferred from March to May Deferred from May to July (05/04/18) Deferred from July to September Deferred from September to November May be deferred from Nov to Jan (TBC)		

			after15/10/18)
Charging for Waste	17/10/2018		Deferred from November to Jan 2019
Thanet Parkway			Deferred from September to November Deferred from November to January
Incentive Fund Asset Management Report		05/10/2018	Possibly defer to March 2019 (TBC)
Work Programme (Standing Item)			
EXEMPT			
Contract Management (Standing Item)			

	Tuesday 19 March 2018				
No.	Item	Key Decision	Date added to WP	Additional Comments	
1 _	Intro/ Web announcement (Standing Item)				
2 age	Apologies and Subs (Standing Item)				
3 o	Declaration of Interest (Standing Item)				
4 🕽	Minutes (Standing Item)				
5 O	Verbal Update (Standing Item)				
	Work Programme (Standing Item)				
	EXEMPT				
	Contract Management (Standing Item)				

Items for Consideration that have not yet been allocated to a meeting Minerals and Waste Local Plan (requested at the E&T CC on 15 May 2018)

A factual report on the progress of the Manston Airport Development Consent Order (requested at the E&T CC on 20 September 2018)

A progress report on the railroad ferry service into Ramsgate (requested at the E&T CC on 20 September 2018)

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From: Mike Hill, Cabinet Member for Community and Regulatory

Services

Barbara Cooper, Corpoate Director of Growth, Environment and

Transport

To: Environment and Transport Cabinet Committee – 28th

November 2018

Subject: Contract Management/ Procurement – Public Rights of Way

Vegetation Clearance

Classification: Unrestricted

Summary: This paper provides an overview of the Public Rights of Way (PRoW) vegetation clearance procurement and contract management.

In May 2018, ten contracts were awarded for vegetation clearance on the PRoW network. The contracts run for a period of five years with an option to extend for a further two year period subject to satisfactory performance. The award of the contracts followed a full and extensive procurement process. There have been teething difficulties with delivery with a contractor voluntarily withdrawing from the contract and another being dismissed. The Public Rights of Way and Access Service has worked with its contractors to recover from these initial difficulties.

Recommendation(s): The Cabinet Committee is asked to note and comment on the contents of this report.

1. Background

- 1.1 Kent's Public Rights of Way (PRoW) network extends to 6900Km. It is maintainable public highway. The County Council, under its statutory obligation to maintain the highway, is responsible for the clearance of vegetation (other than crops) growing from the surface of PRoW, where necessary, and to take action to prevent overhanging vegetation from obstructing them.
- 1.2 The clearance is undertaken to ensure that PRoW remain available and safe to use. Regular clearance prevents obstruction and inconvenience and helps minimise the long term cost of maintaining the network: dense overgrowth costing significantly more to clear per metre.
- 1.3 Approximately 8.3 percent of the PRoW network is subject to planned clearance annually. Prior to 2012 approximately 2000km of vegetation clearance was undertaken annually, covering approximately 14.5% of the network.
- 1.4 A large part of this work is delivered by contractors with specialist equipment and skills in vegetation clearance. In addition to the work carried out by contractors, six volunteer groups equipped and supported by the Service,

undertake clearance. Further, the Countryside Access Wardens undertake spot clearance of overgrown entrances, stiles, gates and bridges using hand tools. This is work that is prohibitively expensive to engage contractors to complete. The volunteer work supplements the planned clearance regime.

2. Procurement of Vegetation Clearance – April 2018

- 2.1 In May 2018, the County Council's PRoW and Access Service awarded 10 contracts for the clearance of vegetation from PRoW. The contracts are to run for a period of five years, with the option to extend them for a further two years, subject to performance. The contracts require that 1,146Km of PRoW are cleared annually during the summer months. There is the option that additional vegetation is cleared as directed, dependent on the ability of the County Council to fund the work.
- 2.2 Award of the contracts followed a thorough and extensive procurement process. In putting in place new contracts, the Service wished to make improvements to the efficiency and effectiveness of the supplied service. Key objectives of the procurement were to:
 - reduce the number of clearance contracts to 10 from the previous number of 15, which would help the service to better manage the contracts;
 - reduce the work involved in the procurement of providers for contracts annually;
 - provide continuity of service through longer contract periods as opposed to the previous one year contracts;
 - enable contractors to invest in people and equipment; and
 - ensure compliance with procurement law given that the total contract value, with an annual spend of £180K, excluding extras, over seven years, would amount to over £1M should the contracts run their full permitted course.
- 2.3 Extensive engagement took place with providers prior to formal procurement, and we had 16 successful responses to the Pre- Qualification Questionnaire (PQQ). Assessment of the PQQ is intended to narrow the field of competing suppliers to those that can actually deliver the work to time, cost and quantity.
- 2.4 The 16 contractors successful at that stage were invited to tender for the work. Having assessed the suitability of the contractors through the PQQ, tenders were assessed entirely on price. The lowest price is scored highest. The Service, working with the Council's procurement team, attempted to mitigate the risks associated with one supplier winning all of the work by limiting any successful contractor to the award of 3 of the 10 contracts (lots) available.
- 2.5 Four companies were successful based on the criteria above and the contracts awarded. Had the contractors been able to deliver the service as required the authority would have saved around £20K per annum when compared with the rates paid in previous years. This would amount to savings in total of between £100K and £140K over the duration of the contracts. Of the four contractors

appointed, two had previously worked in the County and had delivered the service to time, cost and quality.

3. Performance and Financial Implications

- 3.1 With contracts awarded, the service was provided by the appointed contractors from May 2018. In order to monitor the performance of the contracts, the Service has in place robust contract management requiring regular meetings and performance reporting. Extensive checks of contractor work are undertaken. This is particularly the case in the early stages of the contract to ensure that work is being completed and that it is to the required specification. In addition to officers monitoring this performance, volunteer Countryside Access Wardens are also tasked with undertaking checks so that a greater proportion of the network can be monitored than would otherwise be possible.
- 3.2 Within a short period of commencing works it was evident that there were issues with the performance of two of the contractors. One of the contractors was simply unable to meet the requirements of the contract, as evidenced by a poor quality of clearance on the part of the network for which the contractor was responsible, despite having excellent references from another authority. Unfortunately, it was necessary to dismiss this contractor within one month of the contract start date, and to reaward the contract. This introduced a delay to clearance in three of the contract areas, as the newly appointed contractor had to mobilise quickly.
- 3.3 A second contractor struggled to meet the requirements of the contract and, while working closely with us to address the issues, voluntarily withdrew from the contract after one month, conceding that they had in fact priced the tender too low and stood to lose money throughout the life of the contract. This required a further three lots to be re-awarded, and therefore delayed service provision in the affected areas.
- 3.4 As a result, Ashford, Folkestone & Hythe, Canterbury, Thanet, Dover, Sevenoaks, Tonbridge & Malling and Tunbridge Wells areas were all affected with severe delays to our programme in these areas. In some areas, the first vegetation cut did not commence until July when we would expect the first cut to have been completed for the county by mid-June, if not earlier.
- 3.5 In areas where difficulties were experienced Parish Councils were notified and information circulated in the Member bulletin.
- 3.6 However, the net position in having to re-award contracts is that we have not delivered a saving on previous years, indeed the cost has risen in some areas, with a resultant impact on the quantity of additional clearance that we can undertake.
- 3.7 Higher numbers of reports concerning vegetation were received from the public than in the previous year; 1190 as opposed to 943 reports for the same period in 2017, a 21% increase.

3.8 The Service continues to work with the appointed contractors to get all of the programmed clearance completed and to ensure smoother running of the clearance programme next year.

4. Analysis and Lessons Learned

- 4.1 The procurement exercise has raised a number of points for consideration.
- 4.2 First, the field could not be limited to those contractors that are tried and tested. Therefore, there are always likely to be some contractors competing who can point to excellent references and good service provision elsewhere in the country but do not have specific knowledge of the labour market and costs of operating in Kent.
- 4.3 In addition, basing the award purely on price (following the PQQ) introduces risk: The pressures on public finance have resulted in a race to the bottom on price. The Service has tendered this work over many years and, in working with tried and tested contractors, understands that there is a floor price below which the service cannot be delivered without compromising on quality. Those contractors submitting prices below this level have generally over- estimated their likely productivity in terms of metres per operative per day. Often this is on the basis of assuming that bigger more powerful equipment can be used than is actually able to access many of the sites. Here, it is worth remembering that vegetation clearance on PRoW is a very different proposition to cutting highway verges, school playing fields or visibility splays.
- 4.4 The procurement process was onerous for the level of spend and nature of the activity. Feedback from smaller contractors is that the work involved in responding to a PQQ and submitting a tenders is onerous and disproportionate to the ultimate reward. This does not make working for KCC an attractive proposition. This feedback mirrors that received from contractors engaged in the PRoW minor works framework contracts procurement.
- 4.5 The procurement was lengthy, reflecting its complexity and the Governance arrangements around it. This resulted in a reduction in the time available to contractors to mobilise and delays to the commencement of works.

5. Conclusions

5.1 The procurement of PRoW vegetation clearance services had the potential to deliver efficiencies in service delivery and savings to the County Council of up to £140K. In reality, the supplier market in this area was already well developed with the costs of service provision reflecting this maturity. Two of the four contractors successful in the first round of procurement that offered lower prices could not deliver the service at the price quoted and were dismissed or withdrew. Operational efficiencies, however, will be realised over the duration of the contract.

- 5.2 The procurement process was lengthy, ultimately impinging on contractor mobilisation and contract start dates. This in turn affected the service experienced by the public.
- 5.3 Through effective contract management, working closely with its contractors and volunteers and liaising with Parish Councils, the PRoW and Access Service has managed to get the vegetation clearance back on track and is optimistic that a much improved level of service will be experienced in future years.

6. Recommendation

Recommendation:

The Environment and Transport Cabinet Committee is asked to note and comment on the contents of this report.

7. Contact details

Report author:

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Graham.rusling@kent.gov.uk

Relevant Director:

Katie Stewart, Director of Environment, Planning and Enforcement 03000 418827 katie.stewart@kent.gov.uk

